IN THE COURT OF COMMON PLEAS
OF LACKAWANNA COUNTY, PENNSYLVANIA

LEO WOYTACH, JAMES DAVIS, SHAWN TOOLAN, SCOTT STOLARIK, CHAD MARTIN, HELENA JOHNSTON, JOE CLEMENTE, and HILARY BURNS individually and on behalf of all others similarly situated,

Plaintiffs,

v.

DRUG AND ALCOHOL TREATMENT SERVICES, INC.,

Defendant.

Case No.: 2025-CV-03681

Judge Terrence R. Nealon

LAUREN M. MAILEN
LACKAWANNA COUNTY
2025 NOV 12 A 11: 32
CLERK OF JUDICIAL
RECORDS CIVIL DIVISION

Filed on behalf of:
Plaintiffs and the Proposed Class

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Interim Co-Lead Class Counsel

For:
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PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Plaintiffs Leo Woytach, James Davis, Shawn Toolan, Scott Stolarik, Chad Martin, Helena Johnston, Joe Clemente, and Hilary Burns by and through their undersigned attorneys respectfully move this Court for an order: (1) granting final approval of the proposed Class Action Settlement Agreement and Release ("Settlement" or "SA") between Plaintiffs and Defendant Drug and Alcohol Treatment Service (incorrectly identified as "Drug and Alcohol Treatment Services, Inc.," and hereinafter "DATS" or "Defendant") (collectively the "Parties"); and (2) entering final judgment as to the claims raised in this action. In support of this Motion, Plaintiffs state as follows:

1. Plaintiffs incorporate by reference, as if fully set forth herein, the allegations and arguments in Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement, and supporting exhibits, filed on May 8, 2026.

2. Plaintiffs incorporate by reference, as if fully set forth herein, the allegations and arguments in Plaintiffs' Application for Attorneys' Fees, Costs, and Service Awards, and supporting exhibits, filed on August 10, 2026.

3. Plaintiffs submit, and explain further in the accompanying brief in support of this motion, that the facts and circumstances regarding the proposed Settlement have not materially changed in the time since the Court entered its preliminary approval order on May 12, 2026.

4. After the entry of that order, the Parties and the approved Settlement Administrator, RG/2 Claims, proceeded to disseminate Settlement Notice to Class Members in accordance with the Parties' approved notice plan.

5. Plaintiffs submit a detailed description of the results of the notice plan in the accompanying brief, and in the Declaration of Erika Britton, Project Manager at RG/2 Claims ("Britton Decl."), attached hereto.

6. The notice plan has been successfully implemented as of November 4, 2026. Notice was delivered to approximately 17,121 of the 20,351 identified Settlement Class Members. The reach was further enhanced by a Settlement Website.

7. The deadline for Settlement Class Members to opt out of the Settlement, or to file an objection to the Settlement, was August 25, 2026.

8. To date, zero Settlement Class Members have objected to the Settlement.

9. To date, there have been zero opt-out requests submitted.

10. If these numbers change as a result of any belated submissions by Settlement Class Members, Class Counsel will provide an update to the Court at the fairness hearing.

11. Class Counsel will appear at the fairness hearing and be prepared to address any questions or concerns from the Court.

12. In further support of this motion, Plaintiffs refer the Court to their accompanying brief in support.

WHEREFORE, Plaintiffs respectfully request that the Court, upon completion of the fairness hearing, enter the Parties' proposed Final Order and proposed Judgment, in the forms attached hereto.

(signature block to follow on next page)

Dated: November 10, 2026

Respectfully submitted,

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Interim Co-Lead Class Counsel

CERTIFICATE OF CONCURRENCE

LAUREN M. MAILEN
COUNTY
RECORDS CIVIL DIVISION

Pursuant to Rule 208.2(d), the undersigned counsel for Plaintiffs certifies that they conferred with counsel for Defendant. Defendant's counsel does not contest the filing of the foregoing motion.

Dated: November 10, 2026

/s/ Ken Grunfeld
Kenneth J. Grunfeld (PA ID# 84121)

CERTIFICATE OF SERVICE

ANN M. MAILEN
LACKAWANNA COUNTY
2026 NOV 12 A 11:32
CLERK OF JUDICIAL
RECORDS CIVIL DIVISION

AND NOW, this 10th day of November 2026, I certify, as counsel for Plaintiffs, that I have served on this date a true and correct copy of the Unopposed Motion for Final Approval of Class Action Settlement, Brief in Support, Proposed Order, and all other supporting documents, upon Defendant Drug and Alcohol Treatment Services, Inc., *via e- mail* to their counsel as follows:

David J. Shannon (djshannon@mdwcg.com)
Vlada Tasich (vxtasich@mdwcg.com)
Marshall Dennehey, P.C.
2000 Market Street, Suite 2300
Philadelphia, PA 19103

Dated: November 10, 2026

/s/ Ken Grunfeld
Kenneth J. Grunfeld (PA ID# 84121)