

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
WHITE PLAINS DIVISION**

JUSTIN GEORGE, ARIENNE PATZELT,  
MELISSA ZUBER, and TSU HAN POH-  
GRACIA, as representatives of a class of similarly  
situated persons, and on behalf of the Garnet  
Health Medical Center 403(b) Retirement Savings  
Plan and Garnet Health Medical Center - Catskills  
403(b) Retirement Savings Plan,

Case No. 7:24-cv-6422-PMH

Plaintiffs,

v.

GARNET HEALTH MEDICAL CENTER,

Defendant.

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT**

Plaintiffs Justin George, Arienne Patzelt, Melissa Zuber, and Tsu Han Poh-Gracia (“Plaintiffs”) individually and on behalf of the proposed Settlement Class, hereby respectfully move for an order (1) preliminarily approving a class action settlement agreement between Plaintiffs and Garnet Health Medical Center (“Defendant” and together with Plaintiffs, “Parties”); (2) approving Settlement Notice and authorizing its distribution to the Settlement Class; (3) certifying, on a preliminary basis, the proposed Settlement Class; (4) setting a date for a Fairness Hearing; and (5) granting other relief as set forth in the proposed Preliminary Approval Order.

This motion is made based on this Motion, the accompanying Memorandum in Support, Declaration of Jennifer K. Lee and the accompanying exhibits (which includes the Settlement Agreement), Declaration of James White, Declaration of Justin George, Declaration of Arienne

Patzelt, Declaration of Melissa Zuber, Declaration of Tsu Han Poh-Gracia, and all other papers, pleadings, documents, arguments of counsel, and materials presented before or during the hearing on this motion, or any other evidence or argument the Court may consider.

Dated: October 31, 2025

**ENGSTROM LEE LLC**

/s/Jennifer K. Lee

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