

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

IN RE: THE AMERICAN NATIONAL RED
CROSS LITIGATION

Plaintiffs,

This Document Relates To: All Actions

Civil Action

Master File No. 1:21-cv-00541-ACR

Class Action

**PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASS,
AND APPROVAL OF PLAN OF ALLOCATION**

Plaintiffs David E. Bagenstose, Nitza Juarbe, Stacy M. Moxley, Jason L. Richard, Diana F. Tracy, and Lisa Scaramuzzo, participants in the American Red Cross Savings Plan (“Plan”), hereby respectfully move this Court, pursuant to FED. R. CIV. P. 23, for an Order:

1. Granting final approval to the class action settlement in this action on the terms of the Class Action Settlement Agreement (“Settlement Agreement”), fully executed on May 9, 2025, and previously filed with the Court on May 9, 2025 (ECF No. 87-1);

2. Maintaining class certification of this action pursuant to the Court’s Opinion and Order Granting Plaintiffs’ Motion for Class Certification on June 11, 2025 (ECF No. 88) and Order preliminarily approving the Settlement (ECF No. 88);

3. Finding that the manner in which the Settlement Class was notified of the Settlement was the best practicable under the circumstances and adequately informed the Settlement Class members of the terms of the Settlement, how to lodge an objection and obtain additional information; and

4. For such other and further relief as the Court may deem just and proper.

The grounds for this Motion are set forth in the following papers filed contemporaneously herewith:

1. Memorandum of Law in support of Plaintiffs’ Unopposed Motion for Final Approval of Class of Class Action Settlement, Certification of Settlement Class, and Approval of Plan of Allocation; and

2. Declarations of Plaintiffs’ Counsels and Plaintiffs.

Attached hereto is the proposed Final Approval Order and Judgment in the form agreed to by the Parties.

Dated: August 6, 2025

Respectfully submitted,

CAPOZZI ADLER, P.C.

/s/ Mark K. Gyandoh

Mark K. Gyandoh

CAPOZZI ADLER, P.C.

312 Old Lancaster Road

Merion Station, PA 19066

Tel: (610) 890-0200

Email: markg@capozziadler.com

BERGER MONTAGUE PC

Daniel J. Walker, Esq.

(DC Bar No. 9194939)

2001 Pennsylvania Ave., NW

Suite 300

Washington, DC 20006

Telephone: (202) 559-9745

Email: dwalker@bm.net

Natalie Lesser, Esq.

Abigail Gertner, Esq.

1818 Market Street, Suite 3600

Philadelphia, PA 19103

Telephone: (215) 875-3000

Email: nlesser@bm.net

agertner@bm.net

Counsel for Plaintiffs

Interim Co-Lead Class Counsel

EDELSON LECHTZIN LLP

Eric Lechtzin, Esq.

411 S. State Street, Suite N-300

Newtown, PA 18940

Telephone: (215) 867-2399

Email: elechtzin@edelson-law.com

Interim Class Counsel Executive Committee Chair

CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2025, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

By: /s/ Mark K. Gyandoh
Mark K. Gyandoh, Esq.