Alexandra K. Piazza (Attorney ID # 010922013)
BERGER MONTAGUE PC
8241 La Mesa Blvd, Suite A
La Mesa, CA 91942
(215) 875-3000

Ryan Warden (Attorney ID # 044322006)
WARDEN LAW LLC
923 Haddonfield Road, Suite 300
Cherry Hill, NJ 08002
(856) 324-8266

Attorneys for Plaintiff
Michael McMurray and the Proposed Class

MICHAEL MCMURRAY, individually and on behalf of all others similarly situated, Plaintiff, vs. THISTLE HEALTH, INC., Defendant.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION – MERCER COUNTY DOCKET NO.: MER-L-001106-26

[PROPOSED] ORDER FOR PRELIMINARY APPROVAL OF THE CLASS ACTION SETTLEMENT AGREEMENT AND RELEASE

THIS MATTER having come before the Court on Plaintiff's unopposed motion for preliminary approval of the Class Action Settlement Agreement and Release pursuant to New Jersey Rule of Court 4:32-2(e); and the Court having considered the moving papers, including Plaintiff's Memorandum of Law and the Certification of Alexandra K. Piazza and the exhibits thereto submitted in support thereof; and the Court finding that the proposed Settlement is free of obvious deficiencies and falls within the range of reason such that notice to the Settlement Class is warranted; and for good cause shown;

IT IS, on this 23rd day of October, 2026, hereby **ORDERED** that Plaintiff's unopposed Motion is **GRANTED**, and it is further **ORDERED** that:

1. Unless otherwise specified, capitalized terms in this Order for Preliminary Approval of the Class Action Settlement Agreement and Release have the same definition as the terms in the Settlement.

2. The Court finds, for settlement purposes only, that the Settlement Class is so numerous that joinder of all members is impracticable; that there are questions of law or fact common to the Settlement Class; that Plaintiff's claims are typical of the claims of the Settlement Class; that Plaintiff and Class Counsel will fairly and adequately protect the interests of the Settlement Class; and that common questions predominate over questions affecting only individual members and a class action is superior to other available methods for the fair and efficient adjudication of this controversy. R. 4:32-1(a), (b)(3). The Court therefore conditionally certifies, for settlement purposes only, the following Settlement Class: all current and former workers who have been employed by Defendant as independent contractors at its Burlington, New Jersey, production facility between October 17, 2022 and March 31, 2025, excluding any individuals who, as of the date of this Order, are engaged in individual litigation covering the same claims released in the Settlement.

3. This certification is for settlement purposes only and shall not constitute or be construed as an admission by Defendant that this action is appropriate for class treatment for litigation purposes. Should the Settlement not become Final, this conditional certification shall be null and void ab initio and without prejudice to Defendant's right to contest class certification and the merits.

4. The Court hereby preliminarily approves the Settlement Agreement as fair, reasonable, and adequate to the Settlement Class.

5. The Court appoints Plaintiff Michael McMurray as Class Representative and appoints Berger Montague PC and Warden Law LLC as Class Counsel pursuant to R. 4:32-2(g).

6. The Court approves the retention of Analytics Consulting, LLC as Settlement Administrator.

7. The Court approves, as to form and content, the proposed Settlement Notice, and finds that distribution of the Notice by email and text message (with U.S. mail as a backstop for bounced communications), together with maintenance of a settlement website, constitutes the best notice practicable under the circumstances and satisfies the requirements of due process and R. 4:32-2(b)(2). The Court further finds that the Settlement Notice states, in concise, clear, and easily understood language, the nature of the action, the definition of the Settlement Class, the class claims, issues, and defenses, that a Settlement Class Member may enter an appearance through counsel, that the Court will exclude from the Settlement Class any member who requests exclusion and when and how such a request may be made, and the binding effect of a class judgment, as required by R. 4:32-2(b)(2)(A)–(F). Notice shall be given as set forth below. R. 4:32-2(e)(1)(B).

8. Within ten (10) business days of this Order, the Settlement Administrator shall distribute the Settlement Notice to all Settlement Class Members in accordance with the Settlement Agreement. Before distribution, Class Counsel shall provide Defendant and the Settlement Administrator with the estimated minimum Settlement Award for each Settlement Class Member, assuming one hundred percent (100%) participation, within five (5) business days after receipt of the Class List, and the Settlement Administrator and the Parties shall review and approve the proposed amounts within two (2) business days of receipt. On a weekly basis thereafter, the

Settlement Administrator shall provide Class Counsel and Defendant's Counsel with an accounting of the number of Notices sent, the number returned as undeliverable and resent, and the number of requests for exclusion and objections received.

9. Settlement Class Members who wish to exclude themselves from or object to the Settlement must do so in the manner and by the Notice Deadline (forty-five (45) days after the Settlement Notice is initially distributed) set forth in the Settlement Notice and the Settlement Agreement.

10. The Final Approval Hearing shall be held on February 4, 2027 at 9:00 a.m. [*approximately 100 days following the Order Preliminarily Approving the Settlement*], before this Court to determine whether the Settlement should receive final approval as fair, reasonable, and adequate, whether the Settlement Class should be finally certified, and whether to approve Class Counsel's application for attorneys' fees and costs and a Service Award to Plaintiff.

11. Plaintiff's Motion for Final Approval of the Settlement, and Class Counsel's application for attorneys' fees, costs, and a Service Award for Plaintiff, shall be filed no later than fourteen (14) days prior to the Final Approval Hearing.

12. The Court reserves the right to adjourn the Final Approval Hearing without further notice to the Settlement Class other than notice posted on the settlement website and provided to Settlement Class Members who have timely objected.

13. Defendant shall continue to fund the Gross Settlement Amount of $430,000.00 in accordance with the Settlement Agreement. The Settlement Administrator shall be the only entity authorized to make withdrawals or payments from the Qualified Settlement Fund.

14. The Court makes no determination at this time as to Class Counsel's attorneys' fees and costs, the costs of settlement administration, or the Service Award to Plaintiff. Those applications are reserved for determination at the Final Approval Hearing.

15. The Court retains jurisdiction over the implementation, administration, and enforcement of this Order and the Settlement Agreement. If the Settlement does not become Final, this Order shall be null and void, the Parties shall revert to their respective positions as of the date before the Settlement Agreement was executed, and neither this Order nor the Settlement Agreement shall be admissible for any purpose.

IT IS SO ORDERED:

/s/R. Brian McLaughlin

Hon. R. Brian McLaughlin

R. Brian McLaughlin, J.S.C.

Having reviewed the above motion, I find it to be meritorious on its face and is unopposed. Pursuant to R.1:6-2, it therefore will be granted essentially for the reasons set forth in the moving papers.