

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

M.C. and T.G., on behalf of themselves and all
similarly situated individuals,

Plaintiffs,

v.

JEFFERSON COUNTY, NEW YORK, et al.,

Defendants.

Case No. 6:22-cv-190 (DNH/ML)

**PROPOSED ORDER GRANTING PLAINTIFFS' CONSENT MOTION
FOR PRELIMINARY APPROVAL OF PROPOSED CONSENT DECREE
AND APPROVAL OF CLASS NOTICE**

This matter is before the Court on Plaintiffs' Consent Motion for Preliminary Approval of Proposed Consent Decree and Approval of Class Notice (the "Motion").

Having considered Plaintiffs' submissions, the evidence on the record, and the applicable authority, the Motion is GRANTED as follows.

1. Preliminary Approval of the Proposed Consent Decree: The Court preliminarily approves the Proposed Consent Decree as within the range of reasonableness such that final approval is possible, and as meriting dissemination of notice to the certified class for its consideration.
2. Class Certification: The certified class and subclasses remain certified for settlement purposes because they satisfy the requirements of Rule 23 of the Federal Rules of Civil Procedure for the reasons previously discussed in the Court's Memorandum-Decision and Order, dated May 16, 2022.
3. Fairness Hearing: The Court will hold a fairness hearing to decide whether to grant final approval of the consent decree as fair, reasonable, and adequate within the meaning of Rule 23 of the Federal Rules of Civil Procedure. The fairness hearing shall be held on _____, ____, _____ at ____:____ a.m./p.m. at _____. The Court may adjourn the fairness hearing from time to time and without further notice to the class.
4. Class Notice: The Court hereby approves the content and form of the Notice of Proposed Consent Decree and orders counsel for the parties to comply with the notice plan set forth in the Motion.

5. Objections: Any member of the Plaintiff class may mail written objections to any aspect of the Proposed Consent Decree. In determining whether to grant final approval of the Proposed Consent Decree, the Court will only consider objections postmarked on or before _____, ____, _____. Any later post-marked objections shall be disregarded by the Court. The parties' counsel shall file responses to any timely objections on or before _____, ____, _____.

IT IS SO ORDERED.

David N. Hurd
U.S. District Judge

Dated: