

CHANCERY COURT FOR THE STATE OF TENNESSEE
TWENTIETH JUDICIAL DISTRICT, DAVIDSON COUNTY

WILLIAM BOYKIN AND SALLY,
ROBBINS, on behalf of themselves and
all others similarly situated,

DOCKET NO.: 20-0615-BC

Plaintiffs,

v.

TENNESSEE ORTHOPAEDIC
ALLIANCE, P.A.,

Defendant.

**PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AGREEMENT AND ENTRY OF FINAL JUDGMENT**

Plaintiffs William Boykin and Sally Robbins, individually and on behalf of all others similarly situated (hereinafter "Plaintiffs") request that the Court grant final approval of the Settlement Agreement. A proposed Order and Judgment Granting Final Approval of Class Settlement (the "Final Judgment")¹ is attached as **Exhibit D**.

In support of this Motion, Plaintiffs submit:

EXHIBIT A: Supplemental Declaration of Joel R. Rhine in Support of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement Agreement and Entry of Final Judgment.

EXHIBIT B: Affidavit and Declaration of Martin A. Ramey in Support of Final Approval of Class Action Settlement and Certification of Settlement Class.

EXHIBIT C: Declaration of Brian Smitheman of Heffler Claims Group in Support of Final Approval of Settlement.

¹ The proposed Final Approval Order also contains language approving Class Counsel's fees and costs and Service Awards to the Class Representatives.

EXHIBIT D: Order and Judgment Granting Final Approval of Class Action Settlement

In addition, Plaintiffs incorporate the previously filed Class Counsel Declarations, namely: Affidavit and Declaration of Joel R. Rhine in Support of Preliminary Approval of Class Action Settlement and Certification of Settlement Class; Affidavit and Declaration of Martin A. Ramey in Support of Preliminary Approval of Class Action Settlement and Certification of Settlement Class; Declaration of Micah S. Adkins in Support of Preliminary Approval of Class Action Settlement and Certification of Settlement Class; and Declaration of Scott M. Fenwick of Heffler Claims Group In Support of Preliminary Approval.

Plaintiffs' Memorandum in Support of Final Approval of Class Action Settlement Agreement and Entry of Final Judgment is being filed separately.

In sum, because the Settlement Agreement provides a fair, reasonable, and adequate resolution of the claims asserted on behalf of the proposed Class, Plaintiffs request that the Court approve the Settlement Agreement and enter a final judgment.

DATED this 2nd day of December, 2020.

Respectfully submitted,

/s/ Micah S. Adkins

Micah S. Adkins

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CERTIFICATE OF SERVICE

I certify that on December 2, 2020, I caused the foregoing paper to be filed electronically using the Davidson County Chancery Court E-Filing System, which will electronically serve notification of same on the following counsel of record:

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/s/ Micah S. Adkins
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