

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

DARYA DEARING, JANICE GULLICK,
NELSON SIEVERS, and LAUREN
BROWN, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

IQVIA INC.; THE BOARD OF
DIRECTORS OF IQVIA HOLDINGS,
INC.; and THE BENEFITS INVESTMENT
COMMITTEE,

Defendants.

Case No: 1:20-cv-00574-WO-JEP

**MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND
APPLICATION FOR ATTORNEYS' FEES, EXPENSES, AND CASE
CONTRIBUTION AWARDS**

Plaintiffs, Darya Dearing, Janice Gullick, Nelson Sievers and Lauren Brown (collectively, “Plaintiffs”), on behalf of the proposed Settlement Class¹ and the IQVIA 401(k) Plan (the “Plan”), hereby move pursuant to the Court’s order granting preliminary approval of the Settlement for entry of an order that: (1) approves the Settlement memorialized in the Settlement Agreement dated May 15, 2024 (ECF No. 166-2); (2) maintains certification of the Settlement Class; (3) finds the manner in which the Settlement Class was notified of the Settlement was fair, reasonable, adequate and the best notice practicable under the circumstances; (4) approves the Plan of Allocation; and (5) awards Class Counsel attorneys’ fees of one-third of the Gross Settlement Amount (\$1,166,666.67) and litigation expenses of \$241,967.91; and (6) authorizes a case contribution award of \$12,500 to each named Plaintiff.

The Parties have worked cooperatively to effectuate the Notice Plan and Plaintiffs now move the Court to enter an order granting Final Approval of the proposed Settlement as fair, reasonable, adequate, and in the best interests of the Settlement Class, and granting the related applications. Plaintiffs bring this Motion pursuant to Federal Rule of Civil Procedure 23, and it is supported by the concurrently filed Memorandum of Law; the Declaration of Alec J. Berin; the Declaration of Cornelia Vieira and supporting exhibits; the pleadings, records, and papers on file in this action; and all other matters properly before the Court.

¹Capitalized terms not otherwise defined herein shall have the same meaning as in the Settlement Agreement (ECF No. 166-3). On May 24, 2024, the Court granted preliminary approval in its Amended Order (amended only to add a specific calendar date for the final fairness hearing) (ECF No. 169).

Plaintiffs stand ready to provide any additional information that the Court may require in connection with its consideration of the Motion.²

Dated: October 17, 2024

Respectfully Submitted,

/s/ James C. Shah
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Alec J. Berin
(*Special appearance*)
John C. Roberts
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²A [proposed] Final Approval Order is attached as Exhibit D to the Settlement Agreement (ECF No. 166-3, Ex. D). Plaintiffs would be pleased to provide a Word version of the [proposed] Final Approval Order if helpful to the Court.

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*Counsel for Plaintiffs, the Plan
and the Settlement Class*

CERTIFICATE OF SERVICE

I, James C. Shah, hereby certify that, on October 17, 2024, I caused the foregoing Motion for Final Approval of Class Action Settlement and Application for Attorneys' Fees, Expenses, and Case Contribution Awards to be filed via the Court's CM/ECF system and served on counsel for all parties by operation of that system.

/s/ James C. Shah
James C. Shah