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FRANKLIN COUNTY PA
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TIMOTHY S. SPONSELLER
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DEPUTY


**IN THE COURT OF COMMON PLEAS OF FRANKLIN COUNTY, PENNSYLVANIA -
CIVIL DIVISION**

JOHN DOE I, *et al*, : Class Action
: :
Plaintiffs, : :
v. : **Case Sealed by Court Order**
: :
FRANKLIN COUNTY, *et al*, : :
: : Civil Action No. 2014-4623
Defendants. : :

**PLAINTIFFS' UNCONTESTED MOTION FOR AN
AMENDED PRELIMINARY APPROVAL ORDER**

The named Plaintiffs in this action (the "Plaintiffs" or "Representative Plaintiffs") move, uncontested, for an amended preliminary approval order, and in support thereof assert the following:

1. On July 28, 2023, this Court, in granting Plaintiffs' Uncontested Motion for Preliminary Approval of Settlement and Notice Program, issued an Order Preliminarily Approving Settlement and Approving Notice Program (hereinafter, "Preliminary Approval Order").
2. Among other things, the Preliminary Approval Order directed that the Settlement Administrator begin sending out the Class Notices to the Class members within twenty (20) days. *See*, Preliminary Approval Order, ¶ 7.
3. To streamline matters and ensure accuracy of Class member information, the Parties reached out to the Pennsylvania State Police and respectfully requested that it provide an

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electronic spreadsheet containing full name, address, date of birth, and phone number of “any individual who applied for or renewed their license to carry with the Franklin County Sheriff’s Office between December 19, 2012 and January 29, 2016.”

4. While the Pennsylvania State Police graciously provided the requested data, it was not received by all the Parties until July 29, 2023.

5. The data provided by the Pennsylvania State Police contains a number of duplicates, due to multiple addresses existing for the applicant.

6. Accordingly, the Settlement Administrator is in the process of running skip tracing through Accurant, a LexisNexis search product, to obtain the current address of each individual, which will take a couple days, due to there being over 6,000 Class members.

7. As there are over 6,000 Class members, the Settlement Administrator requires 10 days – or until September 13, 2023 – to prepare and mail out all of the Class Notices.

8. So that the Final Approval Hearing can remain scheduled for November 1, 2023, the Settlement Administrator has agreed to notify the Court and Parties of any returned mailing by October 19, 2023 (*i.e.* within 10 days of the Opt-Out/Objection deadline), instead of the 15 days that was originally agreed upon.

9. Thus, assuming this Court grants Plaintiffs’ request, the following would be the applicable schedule through the Final Approval Hearing:

- a. **September 13, 2023** – Notices sent by Class Administrator;
- b. **October 13, 2023** – Opt-Out/Objection Deadline;
- c. **October 16, 2023** – Class Administrator to file sworn statement that Notices were issued;
- d. **October 18, 2023** – Class Administrator Notice to Counsel of Exclusions;

- e. **October 19, 2023** – Class Administrator’s report to Court of returned Notices;
- f. **October 23, 2023** – Class Counsel to file Motion for Final Approval; and,
- g. **November 1, 2023** – Final Approval Hearing

PRAYER FOR RELIEF

WHEREFORE, the Plaintiffs respectfully request that this Honorable Court issue the attached Amended Preliminary Approval Order affording the Settlement Administrator until September 13, 2023 to send out the Class Notices.

Respectfully Submitted,

Date: August 30, 2023



Joshua Princee, Esq.
Prince Law Offices, P.C.

**IN THE COURT OF COMMON PLEAS OF FRANKLIN COUNTY,
PENNSYLVANIA – CIVIL DIVISION**

JOHN DOE 1, <i>et al</i> ,	:	Class Action Complaint
	:	
Plaintiffs,	:	
v.	:	Case Sealed by Court Order
	:	
FRANKLIN COUNTY, <i>et al</i> ,	:	
	:	Civil Action No. 2014-4623
Defendants.	:	

PROOF OF SERVICE

I, Joshua Prince, Esq., hereby certify that I served a true and correct copy of the Uncontested Motion for an Amended Preliminary Approval Order upon the following persons in the manner indicated below, on August 30, 2023:

Via Email

Honorable John Kuhn
Adams County Courthouse
117 Baltimore Street, 4th Floor
Gettysburg, PA 17325

Via US Mail and Email

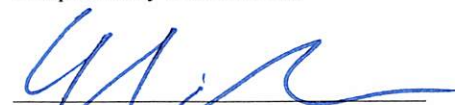
Frank Lavery, Esq.
Lavery Law
225 Market Street, Suite 304
P.O. Box 1245,
Harrisburg, PA 17108-1245

Via US Mail and Email


Scott Wyland, Esq.
Salzmann Hughes, P.C.
1801 Market Street, Suite 300
Camp Hill, PA 17011

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Respectfully Submitted,



Joshua Prince, Esq.

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Dated: August 30, 2023