

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

**MARK JONES, MICHELLE GOULD,
DICKY WARREN, and CARL JUNG,** on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

**STURM, RUGER & COMPANY, INC.,
and FREESTYLE SOFTWARE, INC.,**

Defendants.

Case No. 3:22-cv-01233-KAD

May 9, 2025

**PLAINTIFFS' UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs Mark Jones, Michelle Gould, Dicky Warren, and Carl Jung (“Plaintiffs” or “Class Representatives”), on behalf of the Proposed Settlement Class, respectfully move this Court to:

1. Preliminarily approve the Settlement described in the Settlement Agreement and Release (“Settlement Agreement”) between Plaintiffs and Defendants Sturm, Ruger & Company, Inc. (“Ruger”) and Freestyle Software, Inc. (“Freestyle”) (collectively, “Defendants,” and, together with Plaintiffs, the “Parties”), attached as Exhibit B to the Memorandum in Support of this Motion (“Memorandum”), and the accompanying exhibits, including the Email Notice, Postcard Notice, Long Form Notice, the Claim Form, the [Proposed] Order Granting Preliminary Approval of Class Action Settlement (“[Proposed] Preliminary Approval Order”), and the [Proposed] Final Order and Judgment Granting Final Approval of Class Action Settlement (the “[Proposed] Final Order and Judgment”), attached to the Settlement Agreement as Exhibits 1-6, as fair, reasonable, and adequate;

2. Provisionally certify the Settlement Class pursuant to Federal Rule of Civil Procedure 23 for settlement purposes only;
3. Approve the Notice program set forth in the Settlement Agreement, including the use of Notices substantially similar to those attached as Exhibits 1-3 to the Settlement Agreement;
4. Designate Plaintiffs Mark Jones, Michelle Gould, Dicky Warren, and Carl Jung as Class Representatives;
5. Designate Justin C. Walker of Markovits, Stock & DeMarco, LLC, Gary M. Klinger of Milberg Coleman Bryson Phillips Grossman, PLLC, and Mason A. Barney of Siri & Glimstad LLP as Settlement Class Counsel;
6. Approve the retention of Verita Global, LLC, as Settlement Administrator;
7. Approve the procedures set forth in the Settlement Agreement for Settlement Class Members to exclude themselves from the Settlement Class or to object to the Settlement;
8. Approve the use of a Claim Form substantially similar to that attached as Exhibit 4 to the Settlement Agreement;
9. Stay the Action or otherwise adjourn litigation deadlines pending Final Approval of the Settlement;
10. Stay and/or enjoin, pending Final Approval of the Settlement, any actions brought by Settlement Class Members concerning Released Claims; and
11. Schedule a Final Approval Hearing for a time and date convenient for the Court, at which the Court will conduct an inquiry into the fairness, reasonableness, and adequacy of the Settlement, final approval of the Settlement, and Settlement Class Counsel's Motion for Award of Attorney's Fees, Costs, Expenses, and Service Awards for the Class Representatives.

This Motion is based upon: (1) this Motion; (2) the Memorandum in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement filed herewith; (3) the Joint Declaration of Class Counsel in Support of this Motion, attached as Exhibit A to the Memorandum; (4) the Settlement Agreement, attached as Exhibit B to the Memorandum; (5) the Declaration of Janeth Antonio Regarding Notice Plan, on behalf of Verita Global, LLC, attached as Exhibit C to the Memorandum; (6) the Notices of Class Action Settlement (Email, Postcard, and Long Form Notices), attached as Exhibits 1-3 to the Settlement Agreement; (7) the Claim Form, attached as Exhibit 4 to the Settlement Agreement; (8) the [Proposed] Preliminary Approval Order, attached as Exhibit 5 to the Settlement Agreement; (9) the [Proposed] Final Order and Judgment, attached as Exhibit 6 to the Settlement Agreement; (10) the records, pleadings, and papers filed in this action; and (11) upon such other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

Dated: May 9, 2025

Respectfully submitted,

/s/ Justin C. Walker

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Attorneys for Plaintiffs and the Proposed Class

CERTIFICATE OF CONFERRAL

I, Justin C. Walker, proposed Settlement Class Counsel for Plaintiffs, hereby certify that I have conferred with counsel for Defendants about the relief sought in this motion, and Defendants have agreed not to oppose the relief sought.

/s/ Justin C. Walker
Justin C. Walker (admitted *pro hac vice*)

CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2025, I served the foregoing upon all parties to this action through their counsel of record by filing it with the Court's electronic-filing system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system in accordance with Fed. R. Civ. P. 5(b)(2)(E).

/s/ Justin C. Walker
Justin C. Walker (admitted *pro hac vice*)