

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**ROSE CLARKSON, JUNE MACK,
VALERIE HICKS, CARRIE DEVERS,
THERESA CULVER, AMY CAPODICCI,
GEORGEANN ROBERTS, and
PAMELA SILVER**, individually and on
behalf of those similarly situated,

Plaintiffs,

v.

**ONSITE MAMMOGRAPHY, LLC, d/b/a
ONSITE WOMEN'S HEALTH,**

Defendant.

Case No. 3:25-cv-11123-MGM

CLASS ACTION

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

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, Plaintiffs Rose Clarkson, June Mack, Valerie Hicks, Carrie Devers, Theresa Culver, Amy Capodici, Georgeann Roberts, and Pamela Silver (“Plaintiffs” or “Named Plaintiffs”) individually and on behalf of the Settlement Class, by and through their undersigned attorneys and with the consent, for settlement purposes only, of Defendant Onsite Mammography, LLC, d/b/a Onsite Women’s Health (“Onsite” or “Defendant”) (collectively, the “Parties”), respectfully move this Court for the entry of the proposed Preliminary Approval Order submitted herewith, which seeks preliminary approval of a proposed class action settlement, authorization of class notice and scheduling of a final approval hearing (“Motion”).

1. The terms of the settlement are set forth in the Settlement Agreement that was executed on or around March 5, 2026, attached as Exhibit 1 to the Declaration of Elena Belov, filed contemporaneously herewith.

2. The relief sought in this motion is supported by Counsel Elena Belov's Declaration, filed contemporaneously in support of this Motion; Plaintiffs' memorandum of law in support of the motion for preliminary approval; and the proposed orders and other supporting documents submitted herewith.

3. The proposed settlement falls within the approvable range of fair, reasonable, and adequate; satisfies the requirements of Fed. R. Civ. P. 23, and should be preliminarily approved by this Court.

WHEREFORE, Plaintiffs respectfully request that the Court enter the Proposed Order filed herewith, granting preliminary approval of the class action settlement, conditionally certifying a Settlement Class, approving the form and manner of Notice, and scheduling a Final Approval Hearing.

Dated: March 6, 2026

Respectfully submitted,

/s/ John Roddy
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Interim Co-Lead Class Counsel

CERTIFICATE OF CONFERENCE

I, the undersigned attorney, hereby certify to the Court that I have conferred with opposing counsel in an effort to resolve the issues contained in this motion without the necessity of Court intervention, and opposing counsel has indicated that they do not oppose this motion.

Certified on the 6 March 2026 by:

/s/ John Roddy
John Roddy (BBO # 424240)

CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2026, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record via the ECF system.

/s/ John Roddy
John Roddy (BBO # 424240)