

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

HEIDI LANGAN, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

JOHNSON & JOHNSON CONSUMER
COMPANIES, INC.,

Defendant.

Civil Action No. 3:13-CV-01471-JAM

May 27, 2019

**PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASS, AND
APPROVAL OF CLASS NOTICE**

Plaintiff Heidi Langan, individually and on behalf of the Settlement Class,¹ respectfully moves that the Court:

- (1) Approve the Class Action Settlement and the terms thereof as set forth in the Settlement Agreement;
- (2) Certify the Settlement Class pursuant to Fed. R. Civ. P. 23;
- (3) Approve the notice provided to the Class;
- (4) Confirm the appointment of Plaintiff as Representative of the Settlement Class; and
- (5) Confirm Izard, Kindall & Raabe, LLP as Class Counsel.

¹ All capitalized terms have the meaning set out in the Settlement Agreement. ECF No. 187-1.

In Support of this Motion, Plaintiff has filed a Memorandum of Law and separate supporting declarations of Class Counsel Mark P. Kindall as well as Jennifer M. Keough of JND Legal Administration, the Settlement Administrator appointed by the Court in this case. A Proposed Final Approval Order is submitted herewith as Exhibit A.² Contemporaneous with the filing of this Motion, and consistent with the Settlement, Class Counsel have filed a Motion for Award of Attorneys' Fees and Expenses and a Lead Plaintiff Service Award.

Dated: May 27, 2019

Plaintiff,

By: /s/ Mark P. Kindall
Mark P. Kindall
Robert A. Izard
Izard, Kindall & Raabe, LLP
29 South Main Street Suite 305
West Hartford, CT 06107
Telephone: (860) 493-6292
Facsimile: (860) 493-6290
mkindall@ikrlaw.com
rizard@ikrlaw.com

Nicole Anne Veno
Law Office of Nicole A. Veno, LLC
PO Box 150555
Brooklyn, NY 11215
Telephone: (860) 474-4024
Facsimile: (860) 717-3207
nveno@venolaw.com

² Plaintiff would be happy to provide Word versions of any of the documents at the request of the Court.

CERTIFICATE OF SERVICE

I, Mark P. Kindall, hereby certify that on this 27th day of May 2019, the foregoing was filed electronically. Notice of this filing will be sent by email to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this document through the court's CM/ECF system.