UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DAVID DAGGETT, individually, and as a representative of a Class of Participants and Beneficiaries of the Waters Employee Investment Plan,
 	
        Plaintiff,
 	
        v.
 	
WATERS CORPORATION, ET AL.,
 	
        Defendants.
	Case No. 1:23-cv-11527

PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

Plaintiff David Daggett ("Plaintiff") respectfully moves the Court to: (1) preliminarily approve the Parties' Class Action Settlement Agreement in the above-referenced matter; (2) approve the proposed Settlement Notice and authorize distribution of the Notice to the Settlement Class; (3) preliminarily certify the Settlement Class for settlement purposes only; (4) schedule a final approval hearing; and (5) enter the accompanying Preliminary Approval Order.

This motion is made pursuant to Federal Rule of Civil Procedure 23(e) and is based on the accompanying Memorandum of Law and authorities cited therein, the Declaration of Paul M. Secunda and exhibits attached thereto (including the Settlement Agreement attached as **Exhibit A**), the Declaration of David Daggett, and all files, records, and proceedings in this matter. Defendants do not oppose the motion as parties to the Settlement.

Dated this 30th day of September, 2024   Respectfully submitted,

WALCHESKE & LUZI, LLC

<u>*s/ Paul M. Secunda*</u>
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Attorneys for Plaintiff and Proposed Class

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2024, I caused a copy of the foregoing to be electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

s/Paul M. Secunda
Paul M. Secunda