

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ISRAEL SANCHEZ, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CENTENE CORP., MICHAEL F.
NEIDORFF, and JEFFREY A.
SCHWANEKE,

Defendants.

Case No. 4:17-cv-00806-AGF

**LEAD PLAINTIFF'S UNOPPOSED MOTION FOR
APPROVAL OF DISTRIBUTION PLAN**

TO: All Counsel of Record

PLEASE TAKE NOTICE that in accordance with Federal Rule of Civil Procedure 23(e) and this Court's Order Approving Plan of Allocation of Net Settlement Fund (ECF No. 133) and Judgment Approving Class Action Settlement and Order of Dismissal (ECF No. 134), Lead Plaintiff, Louisiana Sheriffs' Pension & Relief Fund, on behalf of itself and the Settlement Class and by and through its attorneys, hereby moves this Court for entry of the accompanying [Proposed] Order Approving Distribution Plan (the "Class Distribution Order"), which would, *inter alia*: (i) approve the administrative determinations of JND Legal Administration ("JND") accepting and rejecting Claims submitted in connection with the Settlement reached in the above-captioned Action as stated in the Declaration of Luiggy Segura in Support of Lead Plaintiffs'

Unopposed Motion for Approval of Distribution Plan (“Segura Declaration”); (ii) direct the distribution of the Net Settlement Fund to Claimants whose Claims are accepted by JND as valid and approved by the Court (“Authorized Claimants”), while maintaining a Reserve for any tax liability or claims administration-related contingencies that may arise; (iii) direct that distribution checks state that the check must be cashed within 90 days after the issue date; (iv) direct that Authorized Claimants will forfeit all recovery from the Settlement if they fail to cash their distribution checks in a timely manner; (v) approve the recommended plan for any funds remaining after the distribution; (vi) approve JND’s fees and expenses incurred and estimated to be incurred in the administration of the Settlement; (vii) release claims related to the administration process; and (viii) authorize the destruction of Claim Forms and supporting documents at an appropriate time.¹ Pursuant to the terms of the Stipulation, this motion is unopposed by Defendants.

This motion is based upon (i) the Segura Declaration submitted on behalf of JND, the Court-approved Claims Administrator; (ii) the Memorandum of Law in Support of Lead Plaintiff’s Unopposed Motion for Approval of Distribution Plan; and (iii) all other supporting documentation provided herewith.

As there are no disputed Claims by any Settlement Class Member requiring Court review, the motion is ripe for determination. This matter is fully briefed before the Court and a hearing on this motion is not required. Lead Counsel respectfully requests that this motion be decided on the papers.

¹ All terms with initial capitalization not otherwise defined herein shall have the meanings ascribed to them in the Segura Declaration or the Stipulation and Agreement of Settlement dated as of March 5, 2020 (ECF No. 116-1) (the “Stipulation”).

Dated: April 19, 2021

Respectfully submitted,

/s/ Jonathan D. Uslander

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