

Exhibit B

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

PATRICK DUNN, *et al.*, individually, and on
behalf of all others similarly situated,

Plaintiffs,

v.

COMPLETE PAYROLL SOLUTIONS, LLC,

Defendant.

Case No. 1:25-cv-30045

Judge: Hon. Leo T. Sorokin

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

Pursuant to Fed. R. Civ. P. 23, Plaintiffs Patrick Dunn, Patricia Brown, Eric Marcial, Sokankelly Lim, Patrick Nowak, Carolyn Strycharz, and James Connors (“Plaintiffs”), individually and on behalf of all others similarly situated, 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 and certification of a proposed settlement class (the “Settlement Class”) as defined therein. In support of this request, Plaintiffs state the following:

1. The terms of the settlement are set forth in the Settlement Agreement that was executed on or around February 13, 2026, attached as Exhibit 1 to the Declaration of Danielle L. Perry, filed contemporaneously herewith.
2. The relief sought in this motion is supported by Counsel Danielle L. Perry’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: February 17, 2026

Respectfully submitted,

/s/ Danielle L. Perry

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Interim Co-Lead Counsel for Plaintiffs

**Pro hac vice*

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 17 February 2026 by:

/s/ Danielle L. Perry

Danielle L. Perry (admitted *pro hac vice*)

CERTIFICATE OF SERVICE

I hereby certify that on February 17, 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/ Danielle L. Perry

Danielle L. Perry (admitted *pro hac vice*)