

Exhibit D

James E. Cecchi
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: AMERICAN MEDICAL
COLLECTION AGENCY, INC.
CUSTOMER DATA SECURITY
BREACH LITIGATION

This Document Relates To:

Labcorp Track

No. 19-md-2904 (JKS)(MAH)

MDL 2904

NOTICE OF MOTION

To: All persons on ECF mailing list

COUNSEL:

PLEASE TAKE NOTICE that on such date and time as the Court shall determine, the undersigned counsel for Plaintiffs Aleksander Nazemnikov, Cameron Spencer, Carol Kaplan, Debra Wrenn, Edith Thrower, George Rothwell, Holly Laufenberg, Justin Nelson-Carter, Khristopher Thomas, Martha Cuvillier, Melanie Vazquez, Rosaria Gadero, Sandra Lassiter, Sheera Harris, Sherrie Palmer, Timothy Judelsohn, Tracy Buhr, Valerie Scott, Tatyana

Shulman, David Finch, Gina Allende, and Wendy Wallach, individually and on behalf of the Settlement Class, shall move before Hon. Jamel K. Semper, United States District Judge at the Frank R. Lautenberg U.S.P.O. & Courthouse, Newark, New Jersey, for an Order pursuant to Fed. R. Civ. P. 23(e) granting (a) certification of the Settlement Class for settlement purposes only pursuant to Paragraph 6.1 of the Settlement Agreement; (b) preliminary approval of the Settlement Agreement, including the Releases as set forth therein; (c) appointment of Plaintiffs' Counsel as counsel for the Settlement Class; (d) appointment of Plaintiffs as Settlement Class Representatives; (e) approval of the Short Form Notice; (f) approval of the Long Form Notice; (g) approval of the Claim Form to be used by Settlement Class Members to make a Claim; (h) preliminary approval of the Notice Plan and the Settlement Benefits Plan; (i) appointment of Kroll Settlement Administration LLC ("Kroll") as the Settlement Administrator; and (j) appointment of Citibank as Escrow Agent.

The undersigned intends to rely upon the annexed Brief, Declaration of James E. Cecchi and exhibits annexed thereto.

The undersigned hereby requests oral argument.

Dated: March 13, 2026

Respectfully submitted,

By: /s/ James E. Cecchi

James E. Cecchi

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