

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

GRACE MURRAY, AMANDA ENGEN,
JEANNE TIPPET, STEPHEN BAUER, ROBIN
TUBESING, NIKOLE SIMECEK, MICHELLE
MCOSKER, JACQUELINE GROFF, and
HEATHER HALL, on behalf of themselves and
others similarly situated,

Case No. 19-cv-12608-WGY

Plaintiffs,

v.

GROCERY DELIVERY E-SERVICES USA
INC. DBA HELLO FRESH,

Defendant.

**PLAINTIFFS' MOTION FOR LEAVE TO FILE A REPLY IN SUPPORT OF THEIR
MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Pursuant to Local Rule 7.1(b)(3), plaintiffs respectfully move for leave to file an eight-page reply memorandum in support of their motion for final approval of a fourteen-million-dollar (\$14,000,000) common fund class action settlement, which is the largest settlement in Massachusetts federal court history for a lawsuit alleging violations of the Telephone Consumer Protection Act¹ (“TCPA”). There are three objections to the settlement (as compared to over 100,000 claimants, who are otherwise set to receive \$89.00 each for their claims). One objector, Ms. Sarah McDonald, has filed a 20-page opposition to the plaintiffs’ motion for final approval. ECF No. 85. This is in addition to Ms. McDonald’s 20-page objection. ECF No. 75. The plaintiffs seek the eight-page reply to primarily address issues and case law raised in opposition

¹ 47 U.S.C. § 227.

to the motion for final approval that were not made in the objection Ms. McDonald previously filed. A copy of the proposed reply is attached as Exhibit 1 hereto.

LOCAL RULE 7.1(a)(2) STATEMENT

Counsel for the plaintiffs conferred with counsel for the defendant regarding the relief sought by this motion and the defendant consented. Counsel for the plaintiffs conferred with counsel for Ms. McDonald, who did not indicate her consent for the relief sought herein.

Dated: May 7, 2021

Plaintiffs and the Settlement Class
by their attorneys,

/s/ Anthony I. Paronich

Anthony I. Paronich
PARONICH LAW, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
Telephone: (617) 485-0018
anthony@paronichlaw.com

Stacey P. Slaughter (*pro hac vice*)
Brenda L. Joly (MA657255; MN386791)
ROBINS KAPLAN LLP
800 LaSalle Ave., Suite 2800
Minneapolis, MN 55402
sslaughter@robinskaplan.com
bjoly@robinskaplan.com

TURKE & STRAUSS LLP
Samuel J. Strauss (*pro hac vice*)
613 Williamson Street, Suite 100
Madison, WI 53703
(608) 237-1775
Sam@turkestrauss.com

Attorneys for Plaintiffs and Proposed Class

CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will automatically send notification to all attorneys of record.

/s/ Anthony I. Paronich

Anthony I. Paronich