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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ALEJANDRO MORALES, *on behalf
of himself and those similarly situated,*

Plaintiff,

vs.

HEALTHCARE REVENUE
RECOVERY GROUP, LLC and JOHN
DOES 1 to 10,

Defendants.

Civil Action No.
2:15-cv-08401-JBC

**NOTICE OF MOTION
FOR PRELIMINARY APPROVAL
OF CLASS ACTION
SETTLEMENT**

TO: BARRON & NEWBURGER, P.C.
Mitchell L. Williamson
458 Elizabeth Ave - Suite 5371
Somerset, New Jersey 08873

Attorneys for Defendant Healthcare Revenue Recovery Group, LLC

PLEASE TAKE NOTICE that upon this Notice of Motion, Plaintiff
Alejandro Morales, by his undersigned counsel, shall move this Honorable Court,
at a date and time to be determined by the Court, for an Order granting preliminary

approval of the class settlement and related relief as specified in the proposed form of Order.

In support of his Motion, Plaintiff shall rely upon the enclosed brief, declaration of Yongmoon Kim, Esq. (including the exhibits to those declarations), and matters of record in this action.

A copy of Plaintiff's proposed Order is submitted with this Motion.

KIM LAW FIRM LLC
Attorneys for Plaintiff

s/Yongmoon Kim
Yongmoon Kim

Dated: March 7, 2025