

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

PEDRO LUGO, individually and on	)	
behalf of all similarly situated	)	
individuals,	)	
	)	No. 1:24-cv-00700-PTG-WEF
<i>Plaintiff,</i>	)	
	)	
v.	)	Hon. Patricia T. Giles
	)	
INOVA HEALTH CARE SERVICES,	)	
	)	
<i>Defendant,</i>	)	
	)	
_____	)	

**PLAINTIFF’S UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiff Pedro Lugo respectfully submits this motion for an order entering preliminary approval of a proposed class settlement, appointing Plaintiff as Class Representative, approving the proposed form and method of notice, appointing Proposed Class Counsel, and for scheduling a Final Approval Hearing. This motion is not opposed by Defendant nor its counsel.

In support of this motion, Plaintiff files herewith a memorandum of law and proposed order.

Dated: October 16, 2025

Respectfully Submitted,

PEDRO LUGO, individually and on behalf of a  
class of similarly situated individuals,

By: /s/ Kyle McNew  
One of Plaintiff’s Attorneys

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*Attorneys for Plaintiff and the putative class*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 16, 2025, I electronically filed the foregoing *Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement* with the Clerk of the Court using the CM/ECF system. A copy of said document will be electronically transmitted to all counsel of record.

/s/ Kyle McNew