

IN THE CIRCUIT COURT OF LONOKE COUNTY, ARKANSAS

ARCARE, INC.,

PLAINTIFF

v.

Case No. 43CV-17-47

QIAGEN NORTH AMERICAN HOLDINGS, INC.  
and QIAGEN INC.

DEFENDANTS

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

Plaintiff ARCare, Inc. ("Plaintiff") by and through undersigned counsel and pursuant to the Stipulation and Agreement of Settlement dated August 20, 2018 (the "Settlement Agreement") and the exhibits attached thereto, hereby move this Court for preliminary approval of the proposed settlement (the "Settlement") of the above-referenced action (the "Action"). More specifically, Plaintiff respectfully requests this Court enter an order, in substantial form to the proposed order attached as Exhibit A to the Settlement Agreement, (i) preliminarily approving the proposed Settlement as fair, reasonable, and adequate; (ii) approving the form and manner of notice and directing that notice of the proposed Settlement be given to members of the proposed Settlement Class; and (iii) scheduling a hearing before the Court to determine whether the proposed Settlement should be finally approved.

A memorandum of law is being contemporaneously filed herewith.

Dated: August 27, 2018

Respectfully submitted,

BY: /s/ Randall Pulliam  
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*Counsel for Plaintiff and the  
Proposed Settlement Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 27, 2018, I filed a true and correct copy of the foregoing through the Court's electronic filing system, which shall send electronic notification to the parties and registered attorneys of record that the document has been filed and is available for viewing and downloading.

/s/ Randall Pulliam  
RANDALL PULLIAM