

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOSEPH LINDQUIST, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

NCB MANAGEMENT SERVICES, INC.,

Defendant.

Case No. 2:23-cv-01236-KNS

CLASS ACTION

JURY TRIAL DEMANDED

LILLIAN MARDIKIAN, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

NCB MANAGEMENT SERVICES, INC.,

Defendant.

Case No. 2:23-cv-01246-KNS

CLASS ACTION

JURY TRIAL DEMANDED

ERNESTO MEDINA, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

NCB MANAGEMENT SERVICES, INC.,

Defendant.

Case No. 2:23-cv-01270-KNS

CLASS ACTION

JURY TRIAL DEMANDED

CHRISTINE NEUBAUER, Individually, and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

NCB MANAGEMENT SERVICES, INC.,

Defendant.

Case No. 2:23-cv-01300-KNS

CLASS ACTION

JURY TRIAL DEMANDED

JUDE PALMER, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

NCB MANAGEMENT SERVICES, INC. and
BANK OF AMERICA CORPORATION,

Defendants.

Case No. 2:23-cv-01315-KNS

CLASS ACTION

JURY TRIAL DEMANDED

HOWARD SUH, individually and on behalf all
others similarly situated,

Plaintiff,

v.

NCB MANAGEMENT SERVICES, INC.,

Defendant.

Case No. 2:23-cv-1338-KNS

CLASS ACTION

JURY TRIAL DEMANDED

KYLIE MEYER, individually and on behalf of all others similarly situated,

Plaintiff,

v.

NCB MANAGEMENT SERVICES, INC. and
BANK OF AMERICA CORPORATION,

Defendants.

Case No. 2:23-cv-1340-KNS

CLASS ACTION

JURY TRIAL DEMANDED

PLAINTIFFS' MOTION (1) TO CONSOLIDATE THE RELATED ACTIONS, (2) TO APPOINT INTERIM CO-LEAD CLASS COUNSEL, PLAINTIFFS' LIAISON COUNSEL AND A PLAINTIFFS' STEERING COMMITTEE, AND (3) TO SET A DEADLINE FOR THE FILING OF A SINGLE CONSOLIDATED AMENDED COMPLAINT

For the reasons set forth in the accompanying Memorandum of Law, Plaintiffs in the above-captioned actions respectfully request that the Court (1) consolidate the above-captioned Related Actions pursuant to Fed. R. Civ. P. 42(a) under the title "*In re NCB Management Services, Inc. Data Breach Litigation*;" (2) appoint: Benjamin F. Johns of Shub & Johns LLC, Joseph M Lyon of The Lyon Law Firm, LLC, and Christian Levis of Lowey Dannenberg, P.C. as Interim Co-Lead Class Counsel; appoint Charles E. Schaffer of Levin Sedran & Berman LLP as Plaintiffs' Liaison Counsel; and appoint Terence R. Coates of Markovits, Stock & Demarco, LLC, Mark B. DeSanto of Sauder Schelkopf LLC, Danielle L. Perry of Mason LLP, and Carl Malmstrom of Wolf Haldenstein Adler Freeman & Herz LLC to a Plaintiffs' Steering Committee, pursuant to Fed. R. Civ. P. 23(g)(3); and (3) schedule the deadline for Plaintiffs to file their Consolidated Class Action Complaint.

A proposed order granting this requested relief is submitted herewith.

Dated: April 13, 2023

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 13th day of April 2023, a true and correct copy of the above and foregoing was filed with the Clerk of Court via the Court's CM/ECF system for electronic service on all counsel of record.

The undersigned hereby also certifies that on the 13th day of April 2023, a true and correct copy of the above and foregoing will be sent via electronic mail to the following:


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NCB Management Services, Inc.

Dated: April 13, 2023

By: 

Benjamin F. Johns