

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

CamCara, Inc. d/b/a AST Manufacturing,)	
individually, and on behalf of all others similarly)	Civil Action No. 21-cv-02264
situated,)	
)	
Plaintiff,)	
)	
v.)	
)	
Air Products and Chemicals, Inc.,)	
)	
Defendant.		

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

Under Federal Rule of Civil Procedure 23(e), Plaintiff CamCara, Inc. d/b/a AST Manufacturing (“AST”), hereby moves for preliminary approval of a proposed class action settlement (the “Settlement”). The Settlement is documented in an extensive Settlement Agreement, dated August 28, 2025, and its accompanying exhibits (the “Settlement Agreement,” which is attached as Exhibit 1 to the Declaration of Mathew P. Jasinski filed herewith). As set forth in the accompanying memorandum of law, Plaintiff seeks entry of an Order:

1. Preliminarily approving the proposed Settlement on behalf of the Settlement Class according to the terms of the Settlement Agreement;
2. Provisionally certifying, for settlement purposes only, the following Settlement Class pursuant to Fed. R. Civ. P. 23(a) and 23(b)(3):

All current and former Air Products’ customers with Ship-To Locations in the United States who, between June 1, 2018 and August 31, 2020, inclusive, incurred two or more increases to the Product-Surcharge Rate assessed by Air Products at any given Ship-To Location.

3. Preliminarily appointing AST as Class Representative;

4. Preliminarily appointing William H. Narwold, Mathew P. Jasinski, Jessica C. Colombo, and Michael J. Quirk of Motley Rice LLC as Class Counsel to act on behalf of the Settlement Class;

5. Preliminarily approving Plaintiff's proposed Plan of Allocation (attached as Exhibit C to the Settlement Agreement);

6. Approving Plaintiff's selection of RG/2 Claims Administration LLC as Settlement Administrator;

7. Approving the Parties' proposed settlement procedures, including:

- a. Approving the notice plan and proposed Class Notice in substantially the form attached as Exhibit B to the Settlement Agreement;
- b. Establishing deadlines for Class Member exclusions and objections; and
- c. Scheduling a Final Approval Hearing no sooner than 120 days after entry of the Preliminary Approval Order;

8. Entering the proposed Order Granting Preliminary Approval of Class Action Settlement filed herewith; and

9. Granting such other and further relief as may be just and appropriate.

WHEREFORE, Plaintiff respectfully requests that this Court grant this Motion in its entirety and enter the proposed preliminary approval order.

DATED: September 12, 2025

Respectfully Submitted,

MOTLEY RICE LLC

By: /s/ Mathew P. Jasinski

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2025, a copy of the foregoing Plaintiff's Unopposed Motion for Preliminary Approval of Class-Action Settlement was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system (CM/ECF). Parties may access this filing through the Court's CM/ECF system.

/s/ Mathew P. Jasinski
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