

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

PATRICIA ASBURY, ET AL.

Plaintiffs,

V.

EQT CORPORATION, ET AL.

Defendants.

Case No. 2:18-cv-01005-CB

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

COMES NOW, putative class Plaintiffs, by counsel, and by designated class representative, Domenic Laudato, Jr., ("Plaintiff") and moves this Court for an order certifying the class of representatives identified herein, and in support of this motion, states and incorporates all arguments, facts, and conclusions stated in Plaintiffs' Brief in Support of its Motion for Class Certification ("Brief"), submitted contemporaneous to this Motion.

WHEREFORE, Plaintiff, on behalf of himself and absent class members, by undersigned counsel, and in consideration of the Brief as submitted, requests the following relief against Defendants:

- a. That Domenic Laudato Jr., be appointed class representative;
- b. That the class as defined in the Brief be certified under Rule 23;
- c. That any and all issues described in the Brief be certified under Rule 23(c)(4);
- d. That, if necessary, this proceeding, and proposed class, be bifurcated, modified, or amended to the extent necessary by this Court to achieve class certification;
- e. That identified counsel be appointed class counsel; and
- f. Any and all relief this Court finds just and proper.

Respectfully Submitted,

SEVER STOREY, LLP

Jordan H. Walker

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/s/ Elizabeth M. Tarasi

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CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel or parties of record electronically by CM/ECF.

/s/ Jordan H. Walker

Jordan H. Walker

/s/ Elizabeth M. Tarasi

Elizabeth M. Tarasi