

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

RODNEY BARNETT and HEATHER WOLFF,  
individually, and as a representative of a Class of  
Participants and Beneficiaries of The Iron Mountain  
Companies 401(k) Plan,

Plaintiffs,

v.

IRON MOUNTAIN INCORPORATED and  
RETIREMENT PLAN COMMITTEE OF IRON  
MOUNTAIN INCORPORATED,

Defendants.

Case No. 1:24-cv-11239-GAO

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**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL  
OF CLASS ACTION SETTLEMENT**

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**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

Plaintiffs Rodney Barnett and Heather Wolff ("Plaintiffs") respectfully move the Court to:

(1) preliminarily approve the Parties' Class Action Settlement Agreement in the above-referenced matter; (2) approve the proposed Settlement Notice and authorize distribution of the Notice to the Settlement Class; (3) preliminarily certify the Settlement Class for settlement purposes only; (4) schedule a final approval hearing; and (5) enter the accompanying Preliminary Approval Order.

This motion is made pursuant to Federal Rule of Civil Procedure 23(e) and is based on the accompanying Memorandum of Law and authorities cited therein, the Declaration of Paul M. Secunda and exhibits attached thereto (including the Settlement Agreement attached as **Exhibit 1**), the Declarations of Rodney Barnett and Heather Wolff, and all files, records, and proceedings in this matter. Defendants do not oppose Plaintiffs' Motion for Preliminary Approval of

Settlement, including Plaintiffs' request to certify the Settlement Class as a mandatory, non-opt-out class under Fed. R. Civ. P. 23(b)(1) for settlement purposes only.

Dated this 11th day of December, 2024

Respectfully submitted,

**WALCHESKE & LUZI, LLC**

**s/ Paul M. Secunda**

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*Attorneys for Plaintiffs and Proposed Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 11, 2024, I caused a copy of the foregoing to be electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

**s/Paul M. Secunda**  
Paul M. Secunda