

**IN THE DISTRICT COURT OF TULSA COUNTY
STATE OF OKLAHOMA**

BRUCE RIGGS and BRETT GARROTE,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

TRISTAR INSURANCE GROUP, INC.

Defendant.

Case No: CJ-2025-00745

FILED
DISTRICT COURT
TULSA COUNTY, OKLAHOMA
January 19, 2026 4:19 PM
DON NEWBERRY, COURT CLERK
Case Number CJ-2025-745

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

Pursuant to 12 O.S. § 2023(E), Plaintiffs Bruce Riggs and Brett Garrote (“Plaintiffs”) respectfully move this Court for the entry of the proposed Preliminary Approval Order submitted herewith, which seeks the preliminary approval of a proposed class action settlement (the “Settlement”) and certification of a proposed settlement class (the “Settlement Class”) as defined therein. In support of this request, Plaintiffs state and present the following:

1. The terms of the Settlement are set forth in the Settlement Agreement and Release entered into on December 30, 2025, attached as “Exhibit A” to the Declaration of Nicholas Migliaccio in Support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement, filed contemporaneously herewith.
2. The relief sought in this Motion is supported by the aforementioned Declaration, the Declaration of Abbas Kazerounian in Support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement, and Plaintiffs’ Memorandum of Law in Support of Plaintiffs’ Unopposed Motion for Preliminary


Approval of Class Action Settlement and for Issuance of Notice to Settlement Class (“the Memorandum”).

3. Defendant TRISTAR Insurance Group, Inc. does not oppose the relief requested in this Motion.

WHEREFORE, Plaintiffs respectfully request that the Court enter the proposed Order Granting Preliminary Approval of the Class Action Settlement.

Dated: January 16, 2026

Respectfully submitted,



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*Proposed Class Counsel for Plaintiffs and the
Proposed Settlement Class*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of January 2026, a true and correct copy of the foregoing has been furnished by email to the following counsel for Defendant:

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