

**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

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

PLEASE TAKE NOTICE that Plaintiffs Bruce Riggs and Brett Garrotte (together as “Plaintiffs” and “Class Representatives”), individually and on behalf of the Settlement Class, respectfully move pursuant to 12 O.S. § 2023(E) for an Order finally certifying the Settlement Class and granting final approval of the Settlement Agreement, and entering the proposed Final Approval Order and Judgment in this Action.

This Motion is based on the Memorandum of Law in support of Plaintiff’s Unopposed Motion for Final Approval of Class Action Settlement, filed concurrently herewith, the Declarations of Class Counsel, all prior pleadings and proceedings had herein, the arguments of counsel, and any other matters properly before the Court. For the reasons described in Plaintiffs’ accompanying Memorandum of Law, Plaintiffs respectfully request that the Court grant Plaintiffs’ Motion and enter the proposed Final Approval Order.

Dated: May 18, 2026

Respectfully submitted,



Jeremy Beaver, OBA 18645  
**GOTCHER & BEAVER LAW FIRM**  
P.O. Box 160  
323 E. Carl Albert Parkway  
McAlester, Oklahoma 74501  
Telephone: (918) 423-0412  
Facsimile: (918) 423-7363  
Email: jeremy@gotcher-beaver.com

Nicholas A. Migliaccio (admitted *pro hac vice*)  
Jason S. Rathod (admitted *pro hac vice*)  
Saran Q. Edwards (*pro hac vice* anticipated)  
**MIGLIACCIO & RATHOD, LLP**  
412 H Street, NE, Suite 302  
Washington, DC 20002  
Telephone: 202-470-520  
Facsimile: 202-800-2730  
nmigliaccio@classlawdc.com  
jrathod@classlawdc.com  
sedwards@classlawdc.com

Abbas Kazerounian (*pro hac vice* anticipated)  
Mona Amini (*pro hac vice* anticipated)  
**KAZEROUNI LAW GROUP, APC**  
245 Fischer Avenue, Suite D1  
Costa Mesa, California 92626  
Telephone: (800) 400-6808  
Facsimile: (800) 520-5523  
ak@kazlg.com  
mona@kazlg.com

*Counsel for Plaintiff and the Settlement Class*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 18th day of May 2026, a true and correct copy of the foregoing has been furnished by email to the following counsel for Defendant:

James Monagle  
**MULLEN COUGHLIN LLC**  
500 Capitol Mall, Suite 2350  
Sacramento, CA 95814  
jmonagle@mullenlaw.com

Kayleigh Watson  
**MULLEN COUGHLIN LLC**  
1452 Hughes Rd Suite 200  
Grapevine, TX 76051  
kwatson@mullenlaw.com



---

Jeremy Beaver