

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

JASON C. FRITTON, MAREA GIBSON,  
BRIAN W. MOTZENBEEKER, DAWN  
DUFF, and CHRISTOPHER  
SHEARMAN, individually and on behalf  
of all others similarly situated,

Plaintiffs,

v.

TAYLOR CORPORATION, the BOARD  
OF DIRECTORS OF TAYLOR  
CORPORATION, the FIDUCIARY  
INVESTMENT COMMITTEE, and  
JOHN DOES 1-30,

Defendants.

Civil Action No. 22-cv-00415

Judge Jeffrey M. Bryan

Mag. Judge Tony N. Leung

**PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASS,  
AND APPROVAL OF PLAN OF ALLOCATION**

Plaintiffs Jason C. Fritton, Marea Gibson, Brian W. Motzenbecker, Dawn Duff, and Christopher Shearman (collectively, "Plaintiffs"), participants in the Taylor Corporation 401(k) Plan (the "Plan"), respectfully submit this Unopposed<sup>1</sup> Motion for Final Approval of the proposed Settlement documented in the Stipulation of Settlement ("Settlement" or "Stipulation")<sup>2</sup>, certification of the Settlement Class, appointment of Plaintiffs' Counsel as

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<sup>1</sup> Defendants do not oppose this Motion solely for purposes of facilitating the Settlement.

<sup>2</sup> The Stipulation is attached as Exhibit A to the Declaration of Eric Lechtzin in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of the Settlement (ECF No. 86-1). Undefined capitalized terms herein have the same meaning as in the Stipulation.

Class Counsel, and approval of the Plan of Allocation (“Motion for Final Approval”) and respectfully move this Court for an Order granting the relief sought.

The grounds for this motion are set forth in all the files, records, and proceedings herein including Plaintiffs’ Counsel’s declarations, Memorandum of Law in support of this Motion, and supporting documents. A Proposed Order is submitted herewith.

Dated: July 9, 2024

Respectfully submitted,

/s/ Daniel C. Hedlund

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