

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
FORT WAYNE DIVISION**

Martha Walther, Trent Kumfer, Jayme Lea,  
Megan Kelsey, Dave Lowe, Carol Whisler, and  
Michele Porter, as representatives of a class of  
similarly situated persons, and on behalf of the  
80/20, Inc. Employee Stock Ownership Plan,

Plaintiffs,

v.

John Wood and Brian Eagle,

Defendants.

1:23-cv-00294-GSL-ALT

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

Plaintiffs Martha Walther, Trent Kumfer, Jayme Lea, Megan Kelsey, Dave Lowe, Carol Whisler, and Michele Porter (“Plaintiffs”), individually and on behalf of the proposed Settlement Class, hereby respectfully move for an order (1) preliminarily approving a class action settlement between Plaintiffs and Defendants John Wood, Brian Eagle, Patrick Buesching, Patrice Mauk, Rodney Strack, MPE Partners II, L.P., MPE Partners III, L.P., and Pareto Efficient Solutions, LLC; (2) approving the proposed Settlement Notice and authorizing its distribution to the Settlement Class; (3) certifying the proposed Settlement Class; (4) setting a date for a final approval hearing; and (5) granting other relief as set forth in the proposed Preliminary Approval Order.

In support, Plaintiffs submit the accompanying Memorandum of Law; the Declaration of Melissa Carrington, which attaches Exhibit 1 (Settlement Agreement with Exhibits A-E), Exhibit 2 (Biography of Mediator, Hon. John A. Jarvey), and Exhibit 3 (Firm Biography for Engstrom

Lee LLC); the Declarations of Plaintiffs Martha Walther, Trent Kumfer, Jayme Lea, Megan Kelsey, Dave Lowe, Carol Whisler, and Michele Porter; and the Declaration of the Settlement Administrator.

The undersigned has conferred with counsel for Defendants, who do not oppose this motion.

Dated: March 9, 2026

Respectfully submitted,

/s/ Melissa A. Carrington

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on March 9, 2026, the foregoing was electronically filed using the CM/ECF system, causing a Notice of Electronic Filing to be transmitted to all counsel of record.

/s/Melissa A. Carrington  
Melissa A. Carrington