

**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 ATTORNEYS' FEES,
COSTS, ADMINISTRATIVE EXPENSES, AND
CLASS REPRESENTATIVE SERVICE AWARDS**

Pursuant to Federal Rule of Civil Procedure 23(h) and the Court's Order Granting Preliminary Approval of Class Action Settlement, Dkt. 184, Plaintiffs and Class Counsel¹ respectfully move for an Order approving (1) an award of attorneys' fees to Class Counsel in the amount of \$2,333,333.33 (one-third of the \$7,000,000.00 Gross Settlement Amount); (2) class representative service awards to each of the Class Representatives in the amount of \$5,000.00 each; (3) reimbursement to Class Counsel of \$35,812.79 in advanced litigation costs; (4) payment of settlement administration expenses in the amount of \$9,800.00, to the appointed administrator, Atticus Administration, and (5) payment to the independent fiduciary, Fiduciary Counselors, in the amount of \$15,000.00.

This motion is made based on the accompanying Memorandum; Declaration of Melissa

¹ Undersigned counsel was appointed Class Counsel for the Settlement Class. Dkt. 184 ¶ 3.

A. Carrington in Support of Plaintiffs' Motion for Attorneys' Fees, Costs & Administrative Expenses, and Class Representative Compensation; Declaration of Melissa A. Carrington in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, Dkt. 183-1; and all other papers, pleadings, documents, arguments, and materials presented before or during the hearing on this motion, and any other evidence or argument the Court may consider.

Plaintiffs have conferred with counsel for Defendants, who do not oppose this motion. Finally, Plaintiffs will submit a proposed order concerning this fee petition in connection with their motion for final approval of the settlement, to be taken up together at the Court's final fairness hearing on July 14, 2026.

Dated: May 22, 2026

Respectfully submitted,

/s/ Melissa A. Carrington

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 22, 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