

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

Martha Walther, Trent Kumfer, and Jayme Lea, 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, Brian Eagle, MPE Partners II, L.P. and
MPE Partners III, L.P.,

Defendant.

Case No. 1:23-cv-00294-GSL-ALT

**DECLARATION OF BRYN BRIDLEY ON NOTICE
AND SETTLEMENT ADMINISTRATION**

I, BRYN BRIDLEY, declare as follows:

1. I am the Vice President of Business Development at Atticus Administration, LLC (“Atticus”), a firm providing class action settlement and claims administration services. I have extensive experience with class action notice and settlement administration services. I am fully familiar with the facts contained herein based upon my personal knowledge and involvement in this matter. I am over twenty-one (21) years of age and am authorized to make this declaration on behalf of Atticus and myself.

2. Atticus is serving as the Settlement Administrator for this matter and is responsible for carrying out the terms of the *Class Action Settlement Agreement* as ordered by the Court in its *Order Granting Preliminary Approval of Class Action Settlement* (“Preliminary Approval Order”) entered on March 13, 2026.

3. I submit this declaration to inform the Parties and the Court of the settlement administration activities completed to date. This declaration describes the: (i) CAFA Notice, (ii) dissemination of the *Notice of Class Action Settlement* (“Settlement Notice” or “Notice”), (iii) Settlement Website and toll-free number, (iv) objections and Rollover Forms received, and (v) Administrative Expenses.

I. CAFA NOTICE

4. On March 19, 2026, Atticus, at the request of Defendants, sent the notices required by the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, to the appropriate federal and state officials. To date, Atticus has received no objections to the CAFA notice from these government agencies. A true and correct copy of the CAFA letter is attached hereto as **Exhibit A**.

II. DISSEMINATION OF THE SETTLEMENT NOTICE

5. Between March 16, 2026 and March 31, 2026, Atticus received three (3) data files from the Parties containing contact information for 328 Plan Participants who were issued a Termination Distribution, and their Beneficiaries or Alternate Payees of record (“Settlement Class,” “Settlement Class Members,” or “Class Members”). Atticus reviewed the data and found no issues with its content.

6. The data was processed through the National Change of Address (“NCOA”) database maintained by the United States Postal Service (“USPS”). This process returns address updates for individuals who have filed a change of address form with the USPS in the past four (4) years to help ensure accurate mail delivery.

7. On April 10, 2026, the Court-approved Settlement Notice was sent by U.S. First Class Mail to all 328 Class Members. In addition, on April 13, 2026, Atticus disseminated the Settlement Notice by email to 404 email addresses associated with those Class Members. The

Settlement Notice provided Class Members with a summary of the Settlement and informed them of their rights and options under the terms of the Settlement. The Settlement Notice also included contact information for the Parties and Atticus, as well as the date and time of the Fairness Hearing. The Settlement Notice was accompanied by a Rollover Form for Class Members who wished to receive their share of the Settlement by direct rollover to a qualified individual retirement account. A true and correct copy of the Settlement Notice and Rollover Form distributed to the Settlement Class are attached hereto as **Exhibit B**.

8. Of the 328 Settlement Notices mailed, 25 were returned to Atticus as undeliverable. One (1) returned Notice included forwarding information and was promptly remailed. The remaining 24 returned Notices were subject to skip tracing. Updated addresses were obtained for 23 records through trace efforts, and Notices were remailed. Ultimately, one (1) mailed Settlement Notice (approximately 0.3%) remains undeliverable. Additionally, Atticus has recorded 33 bounced email notices, representing approximately 8.2% of all email notices disseminated, including bounce reasons categorized as non-existent, suspended, mailbox full, or other.

III. SETTLEMENT WEBSITE AND TOLL-FREE TELEPHONE NUMBER

9. Atticus obtained the URL www.8020ERISASettlement.com and established the content at that location as the Settlement Website. The site was launched on April 10, 2026 in conjunction with the Settlement Notice distribution. The website address, which was printed in the mailed Notice and was a direct link in the emailed notice, includes a summary of important settlement dates and deadlines, access to legal documents filed with the Court, answers to frequently asked questions about the Settlement, and Atticus' contact information. The website has been fully operational since its inception and will remain available until Settlement administration concludes.

10. On April 10, 2026, Atticus also activated the toll-free telephone number 1-800-416-6807 as the Settlement information line. The toll-free number was included in the Notice and is also available on the website. The toll-free line includes an introductory message that provides callers with the website address where additional information may be obtained and is answered by live customer service specialists during Atticus' normal business hours. After hours or if a support specialist is unavailable to answer a live call, callers are allowed to leave voicemail messages and receive callbacks from Atticus' support team. To date, the toll-free line has received a total of five (5) inbound calls, 12 voicemails, nine (9) outbound calls, and 26 email inquiries. The toll-free telephone number has been continuously operational since activation and remains accessible at this time.

IV. OBJECTIONS AND ROLLOVER FORMS RECEIVED

11. Class Members have until June 23, 2026, to object to the Settlement, or any part of it, by submitting a written objection that includes supporting documentation and complies with the requirements outlined in the Settlement Notice. Objections must be postmarked for delivery to Class Counsel and Defense Counsel no later than the deadline. To date, Atticus has not received or been made aware of any objections.

12. Class Members who wish to receive their Settlement payment as a rollover to a qualified individual retirement account or an eligible employer-sponsored qualified retirement plan have until July 14, 2026, ("Rollover Deadline") to postmark a completed Rollover Form. Atticus has received 109 submissions to date, of which 103 are valid, one (1) is under review, and five (5) are invalid—four (4) because they are duplicate submissions and one (1) received from a non-Class Member. Class Members who submit invalid Rollover Forms but are otherwise eligible

to be paid will receive their share of the Settlement by check. Atticus will continue to receive and process Rollover Forms postmarked on or before Rollover Deadline.

V. ADMINISTRATIVE EXPENSES

12. Atticus agreed to administer the terms of the Settlement for \$9,800.00.

I declare under penalty of perjury under the laws of the State of Indiana and the United States of America that the foregoing is true and correct, and that this declaration was executed on the 12th day of June 2026 in St. Paul Minnesota.



Bryn Bradley