

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

Chris Carrigan, Michael Venti, and Sylvain Yelle, individually and as representatives of a class of similarly situated persons, and on behalf of the Xerox Corporation Savings Plan

Plaintiffs,

v.

Xerox Corporation, the Xerox Corporation Plan Administrator Committee, and John Does 1-30

Defendants.

Civil Action No. 3:21-cv-01085-SVN

Plaintiffs' Motion for Attorneys' Fees and Costs, Administrative Expenses, And Class Representative Service Awards

December 8, 2023

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on February 5, 2024, at 2:00 p.m., before the Honorable Sarala V. Nagala, United States District Judge, in Courtroom One of the United States District Court for the District of Connecticut, in Hartford, Connecticut, Plaintiffs Chris Carrigan, Michael Venti, and Sylvain Yelle ("Plaintiffs") will and hereby do move this Court for an Order awarding: (1) attorneys' fees to Class Counsel in the amount of \$1,366,666 (one-third of the \$4.1 million Settlement Fund); (2) reimbursement of \$48,980.72 in litigation expenses and \$106,865.23 in settlement administration expenses; and (3) Class Representative service awards in the amount of \$5,000 to each of the named Plaintiffs (\$15,000 total).

This motion is made under Federal Rule of Civil Procedure 23(h) and Article 8 of the Parties' Class Action Settlement Agreement, ECF No. 99-03, and is based on the accompanying Memorandum of Law and authorities cited therein, the Declarations of Brock J. Specht and Joshua

R. Goodbaum, the previously filed declarations of the Class Representatives, ECF Nos. 99-06, 99-07, 99-09, the Settlement Agreement, and all files, records, and proceedings in this matter.

Counsel for Plaintiffs have conferred with counsel for Defendants regarding this motion and have been advised that Defendants do not oppose the motion.

Dated: December 8, 2023

Respectfully submitted,

NICHOLS KASTER, PLLP

By: /s/ Brock J. Specht

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