

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

David Kinder, Tracy Scott, Elbert Peay, and
Cherry Crawford, individually and as
representatives of a class of similarly situated
persons, and on behalf of the Georgia-Pacific
LLC Hourly 401(k) Plan, the Georgia-Pacific
LLC 401(k) Retirement Savings Plan, and the
Koch Industries Inc. Employees' Savings
Plan,

Plaintiffs,

v.

Koch Industries, Inc., Koch Business
Solutions, LP, the Koch Benefits
Administrative Committee, and
John Does 1-30,

Defendants.

Case No. 1:20-cv-02973-MHC

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

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on December 9, 2021 at 9:30 a.m., before the Honorable Mark. H. Cohen, United States District Judge, in Courtroom 1905, Richard B. Russell Federal Building and United States Courthouse, 75 Ted Turner Drive SW, Atlanta, Georgia, Plaintiffs David Kinder, Tracy Scott, Elbert Peay, and Cherry Crawford ("Plaintiffs") will and hereby do move this Court for an Order

awarding: (1) attorneys' fees to Class Counsel in the amount of \$1,000,000.00 (25% of the \$4 million Gross Settlement Amount); (2) reimbursement of \$17,658.77 in litigation costs and \$209,532 in settlement administration expenses; and (3) class representative service awards in the amount of \$5,000 to each of the named Plaintiffs (\$20,000 total).

This motion is made pursuant to Federal Rule of Civil Procedure 23(h) and Article 8 of the Parties' Class Action Settlement Agreement (Dkt. 67-03), and is based on the accompanying Memorandum of Law and authorities cited therein, the Declarations of Kai Richter and Josh Sanford, the previously filed declarations of the Class Representatives (Dkts. 67-07, 67-09, 67-11, 67-13), 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. As of the filing of this motion, there also have been no objections to the proposed Attorneys' Fees and Costs, Administrative Expenses, or Class Representative Compensation.

Respectfully submitted this 19th day of October, 2021.

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s/Kai Richter

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Counsel for Plaintiffs and the Class

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1(C) of the United States District Court for the Northern District of Georgia, using 14-point Times New Roman font, as approved by the Court.

Dated: October 19, 2021

s/Kai Richter
Kai Richter

CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2021, I caused a copy of the foregoing to be electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

Dated: October 19, 2021

s/Kai Richter
Kai Richter