

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Paul Laidig, Peter Lewis, and Derek Kemp, as
representatives of a class of similarly situated
persons, and on behalf of the Vi-Jon
Employee Stock Ownership Plan,

Plaintiffs,

v.

GreatBanc Trust Company, Berkshire Fund
VI, Limited Partnership, John G. Brunner,
John G. Brunner Revocable Trust dated 06-
09-1992, and John and Jane Does 1-20,

Defendants.

Case No. 1:22-cv-01296

Hon. LaShonda A. Hunt

Hon. Heather K. McShain

NOTICE OF PARTIAL SETTLEMENT

Plaintiffs and Defendants John G. Brunner and John G. Brunner Revocable Trust dated 06-09-1992 (“Brunner Defendants,” together with Plaintiffs, the “Settling Parties”) hereby notify the Court that they have reached a partial settlement in principle in the above-captioned action on a classwide basis. The Settling Parties expect to be able to finalize a settlement agreement and file a motion for preliminary approval of partial class action settlement on or before December 28, 2024.

Dated: October 30, 2024

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s/Paul J. Lukas

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*Attorneys for Defendants John G. Brunner and
John G. Brunner Revocable Trust dated 06-09-
1992*

CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2024, 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 30, 2024

s/Paul J. Lukas
Paul J. Lukas