

**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, John and Janell Brunner Family
Trust Dated May 27, 2020, Gerald Bowe,
Jane Brock-Wilson, Gregory Delaney, Gerald
Greiman, Sharlyn C. Heslam, Edward
Kolodziecki, Lawrence J. LeGrand, Spencer
Murray, Rich Koulouris, Keith Grypp, Scott
Mekus, VJCS Holdings, Inc., Vi-Jon, Inc.,
and VJ Holding Corp.,

Defendants.

Case No. 1:22-cv-01296

Hon. LaShonda A. Hunt

Hon. Heather K. McShain

**SETTLING PARTIES' NOTICE OF
PRESENTMENT OF UNOPPOSED
MOTION FOR APPOINTMENT OF
INDEPENDENT FIDUCIARY**

TO DEFENDANTS AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on **May 20, 2025 at 10:00 a.m. (Central)**, counsel for Plaintiffs Paul David Laidig, Peter Lewis, and Derek Kemp ("Plaintiffs"), and counsel for Defendants John Brunner and the John G. Brunner Revocable Trust dated 06-09-1992 (the "Brunner Defendants," and with Plaintiffs, the "Settling Parties") shall appear before the Honorable LaShonda A. Hunt or any judge sitting in her stead in Courtroom 1425 of the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604 and then and there present the Settling Parties' Unopposed Motion for Appointment of

Independent Fiduciary in the above-captioned matter, a copy of which is served via the Court's CM/ECF system.

Dated: May 9, 2025

NICHOLS KASTER, PLLP

s/ Brock J. Specht

Paul J. Lukas

Brock J. Specht (*pro hac vice*)

Laura A. Farley (*pro hac vice*)

Benjamin Bauer (*pro hac vice*)

Patricia C. Dana (*pro hac vice*)

4700 IDS Center

80 S. 8th Street

Minneapolis, MN 55402

Telephone: (612) 256-3200

Facsimile: (612) 338-4878

lukas@nka.com

bspecht@nka.com

lfarley@nka.com

bbauer@nka.com

pdana@nka.com

BAILEY & GLASSER, LLP

Patrick O. Muench

Gregory Y. Porter (*pro hac vice*)

Ryan Jenny

1055 Thomas Jefferson Street NW

Suite 540

Washington, D.C. 20007

Telephone: (202) 463-2101

pmuench@baileyglasser.com

gporter@baileyglasser.com

rjenny@baileyglasser.com

Attorneys for Plaintiffs

By: s/ Richard J. Pearl

Richard J. Pearl

FAEGRE DRINKER BIDDLE & REATH LLP

320 S. Canal Street, Suite 3300

Chicago, IL 60606

Phone: 312-569-1000

Email: rick.pearl@faegredrinker.com

Stephanie L. Gutwein

Margaret L. Kieffer

FAEGRE DRINKER BIDDLE & REATH LLP

300 N. Meridian Street, Suite 2500

Indianapolis, IN 46204

Phone: 317-237-0300

Email: stephanie.gutwein@faegredrinker.com

maggie.kieffer@faegredrinker.com

*Attorneys for Defendants John G. Brunner, John
G. Brunner Revocable Trust dated 06-09-1992,
and John and Janell Brunner Family Trust
Dated May 27, 2020*

CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2025, 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: May 9, 2025

s/Brock J. Specht
Brock J. Specht