

**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, et al.,

Defendants.

Case No. 1:22-cv-01296

Hon. LaShonda A. Hunt

Hon. Heather K. McShain

**DECLARATION OF BRYN BRIDLEY
ON CAFA NOTICE**

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 and claims administration services. I have extensive experience with class action notice and claims administration. I am fully familiar with the facts contained herein based upon my personal knowledge and involvement with the above-captioned action.

2. Atticus is the Settlement Administrator for the above-captioned action and is responsible for carrying out the terms of the *Class Action Settlement Agreement* (“Settlement Agreement”) as ordered by the Court in its *Order Preliminarily Approving Partial Class Action Settlement, Approving Procedure and Form of Notice, and Scheduling Final Approval Hearing* (“Preliminary Approval Order”) dated May 13, 2025.

3. I submit this declaration to inform the parties and the Court of the settlement administration activities completed to date. This declaration describes the distribution of the CAFA Notice.

I. CAFA NOTICE

4. On February 5, 2025, Atticus sent notice of this proposed Settlement to relevant state and federal officials pursuant to the Class Action Fairness Act, 28 U.S.C. § 1715 (“CAFA Notice”). The CAFA Notice was sent vis U.S. Priority Mail to the Attorneys General of two (2) states and the Attorney General of the United States. The CAFA Packet included a cover letter accompanied by a CD-ROM or PDF attachments that contained the (a) Complaint Class Action, (b) Amended Complaint Class Action, (c) Plaintiffs’ Notice of Presentment of Opposed Motion for Partial Preliminary Settlement Approval, (d) Notice of a hearing on the contested Motion for Preliminary Approval of the Partial Class Action Settlement, (e) Settlement Agreement, (f) Proposed Preliminary Approval Order, and (g) a breakdown of estimated Class Members by state of residence. A true and correct copy of the cover letter enclosed in the CAFA Packet with the delivery report is attached hereto as **Exhibit A**.

I declare under penalty of perjury under the laws of the State of Illinois and of the United States of America that the foregoing is true and correct and executed on this the 11th day of July 2025 in Mendota Heights, Minnesota.

A handwritten signature in dark ink, appearing to read "Bryn Bradley", is written over a printed name label that also says "Bryn Bradley". The signature is stylized with loops and flourishes.

EXHIBIT A



ATTICUS

1295 Northland Drive
STE 160
St. Paul MN 55120

1-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

February 5, 2025

VIA U.S. PRIORITY MAIL

Pamela Bondi
Attorney General of the United States
US Department of Justice
950 Pennsylvania Avenue NW
Washington DC 20530-0001

Re: Class Action Fairness Act Notice

Laidig, Lewis, and Kemp and on behalf of the Vi-Jon Employee Stock Ownership Plan v Great Banc Trust Company, et al.

United States District Court for the Northern District of Illinois, Eastern Division

Case No: 1:22-cv-1296

Dear Sir or Madam,

ATTICUS ADMINISTRATION, LLC has been retained as the third-party Settlement Administrator in a putative class action lawsuit in the above-references class (the “Action”) pending in United States District Court for the Northern District of Illinois, Eastern Division. The parties have proposed to settle certain claims asserted in the Action with the terms of a settlement agreement which was filed with the Court on January 27, 2025.

This Notice of a proposed settlement is being provided to you in accordance with the Class Action Fairness Act, 28 U.S.C. § 1715. The enclosed CD-ROM, the contents of which are identified below, includes all of the materials requested under the statute.

Contents of the Enclosed CD-ROM

1. Complaint Class Action (Attachment 1)
2. Amended Complaint Class Action (Attachment 2)
3. Plaintiffs’ Notice of Presentment of Opposed Motion for Partial Preliminary Settlement Approval (Attachment 3)
4. Notice of a hearing on the contested Motion for Preliminary Approval of the Partial Class Action Settlement (Attachment 4)
5. Proposed Class Action Settlement Agreement (“Settlement Agreement”) (Attachment 5)
 - i. Exhibit 1- Notice for Active ESOP Members (“Proposed Notice”)



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- ii. Exhibit 2- Notice for Non-Active ESOP Members (“Proposed Notice”)
 - iii. Exhibit 3- Non-Active ESOP Participant Rollover Form (“Proposed Notice”)
- 6. Proposed Preliminary Order Name (“Preliminary Approval Order (Attachment 6)
 - 7. Estimate of The Number of Class Members Residing in Each State and the Estimated Proportionate Share of the Claims of such Members to the Entire Settlement (Attachment 7)

A final judgment has not been entered in this Action and no notice of dismissal has been filed at this time. The Court has scheduled a Hearing for March 4, 2025 at 10:15 am.

At this time, no written judicial opinions have been issued in this action relating to the materials described in 28 U.S.C. § 1715(b) (3)-(6) regarding any proposed or final notification to the class members, any proposed or final class action settlement, any settlement or other contemporaneous agreement, or final judgment or notice of dismissal.

If you are unable to access any of the information included on the enclosed CD, kindly contact the Settlement Administrator’s office at 1-844-728-8428 or email at info@atticusadmin.com. For questions about the proposed settlement please contact Counsel for Defendants John Brunner and the John G. Brunner Revocable Trust dated 06-09-1992 at Faegre Drinker Biddle & Reath LLP.

With kind regards,

Office of the Settlement Administrator

Enclosure – CD-ROM



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February 5, 2025

VIA U.S. PRIORITY MAIL

Andrew Bailey
Missouri Attorney General
Supreme Court Building 207 W High St
PO Box 899
Jefferson City MO 65102

Re: **Class Action Fairness Act Notice**

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February 5, 2025

VIA U.S. PRIORITY MAIL

Jonathan Skrmetti
Tennessee Attorney General & Reporter
Office of the Attorney General and Reporter
PO Box 20207
Nashville TN 37202-0207

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