

**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 NOTICE AND SETTLEMENT  
ADMINISTRATION**

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* (“Partial 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: (i) dissemination of the *Notice of Pending Class Action Settlement and Fairness Hearing* (“Notice”), (ii) Settlement

Website and toll-free telephone number, (iii) Rollover Forms and objections received, and (iv) the cost of settlement administration.

**I. NOTICE TO THE SETTLEMENT CLASS**

4. On June 9, 2025, Atticus received a data file from Class Counsel containing the name, last known address, and vested balance(s) of associated participants and beneficiaries of the Vi-Jon Employee Stock Ownership Plan n/k/a Emprise Group, Inc. Employee Stock Ownership Plan (the “Plan”) who had a vested Plan balance at any time from August 20, 2020 to October 29, 2024 (the “Class Period”) (“Settlement Class,” “Settlement Class Member,” or the “Settlement Class List”). On June 10, 2025, Class Counsel provided two (2) supplemental files that included updated address information for Settlement Class Members. The files were consolidated and Atticus determined whether each Settlement Class Member was an Active ESOP Participant Class Member, or a Non-Active ESOP Participant Class Member based on the Plan account balance information received. The final Settlement Class List included 1,403 unique Settlement Class Members - 921 Active ESOP Participant Settlement Class Members who had Plan account balances greater than \$0.00 on October 29, 2024, and 482 Non-Active ESOP Participant Settlement Class Members with did not have Plan account balances as of October 29, 2024.

5. The final Settlement Class List was processed through the National Change of Address database maintained by the United States Postal Service (“USPS”) prior to sending the Notice by mail. The process returns address updates for any person that has filed a change of address card with the USPS in the four (4) years prior.

6. On June 12, 2025, Notice was sent by U.S. First Class mail to the 1,403 Settlement Class Members. The Notice provided Settlement Class Members with an overview of the Partial Settlement, of their legal rights and options under the terms of the Partial Settlement and the

deadlines by which to act on those rights, the benefits available, details on the Fairness Hearing, and contact information for the Settling Parties and Atticus.

7. Different Notices were mailed to Active ESOP Participant Class Members and Non-Active ESOP Participant Class Members. The Notice provided to Active ESOP Participant Class Members informed them of their current Plan account status and that settlement benefits would be automatically distributed to their Plan accounts upon Final Approval of the Partial Settlement. A true and correct copy of the Active ESOP Participant Class Member Notice is attached hereto as **Exhibit A**. The Notice provided to Non-Active ESOP Participant Class Members informed them of their former Plan account status and that their settlement benefits would be distributed upon Final Approval of the Partial Settlement in the form of a mailed payment, unless they chose to complete and submit a Non-Active ESOP Participant Rollover Form, allowing them to have the benefit amount rolled into a qualified retirement account. The Non-Active ESOP Participant Rollover Form was enclosed in the Non-Active ESOP Participant Notice mailing – a true and correct copy of which is attached hereto as **Exhibit B**.

8. Of the 1,403 total Notices sent by mail, 70 were returned to Atticus as undeliverable. Two (2) of the 70 records included forwarding address information and were promptly remailed to the addresses provided by the USPS. Sixty-six (66) undeliverable records were sent to a professional service for address tracing. New addresses were obtained for 39 of the undeliverable records and were not found for 27 undeliverable records. Notices were promptly remailed to the 39 addresses received. Four (4) of the remailed Notices were returned to Atticus a second time. Two (2) records from the June 12 mailing were returned to Atticus as undeliverable at or after the Settlement Class Members' July 22, 2025, response deadline and were not traced. Any untraced, undeliverable records for Non-Active ESOP Participant Class Members will be

traced prior to the distribution of payments. In total, 1,368 Settlement Class Members or 97.5% of the Settlement Class were successfully mailed a Notice.

## **II. SETTLEMENT WEBSITE AND TOLL-FREE INFORMATION LINE**

9. Atticus launched the Settlement Website [www.ViJonESOPSettlement.com](http://www.ViJonESOPSettlement.com) on June 12, 2025, in conjunction with the Notice mailing. The URL was printed in the mailed Notice. Among other things, the website includes access to the Notices and Non-Active ESOP Participant Rollover Form, all documents filed with the Court in connection with the Partial Settlement, key dates and deadlines (including the deadline for serving objections and the deadline for serving notice of intent to appear at the Fairness Hearing), answers to frequently asked questions about the Partial Settlement, and information on how to contact Atticus. The website has remained continuously operational since it was launched.

10. The toll-free number 1-800-291-5085 was also obtained and activated by Atticus as the toll-free Partial Settlement information line, at the time of Notice mailing. The toll-free number was included in the mailed Notices and provided on the website's "Contact Us" page. Calls received on the toll-free Partial Settlement information line during Atticus' normal hours of operation are answered by a live Atticus customer service representative. Individuals who call after hours or when a customer service representative is unavailable are provided with the opportunity to leave a voicemail message and receive a callback from support staff. The toll-free line has been continuously operational since it was activated and remains available to Settlement Class Members at this time. To date, a total of 17 calls have been received.

### **III. OBJECTIONS AND ROLLOVER FORMS**

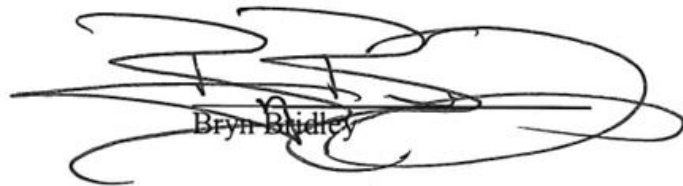
11. Settlement Class Members who did not agree with the proposed Partial Settlement had until July 22, 2025, to file a written objection in accordance with the guidelines set forth in the Notice. Atticus did not receive and was not made aware of any objections.

12. Non-Active ESOP Participant Class Members who wished to receive their share of the Net Settlement Amount as a rollover to a qualified retirement plan had until July 22, 2025, to complete and postmark the Non-Active ESOP Participant Rollover Form and send it to Atticus. To date, Atticus has received 3 Non-Active ESOP Participant Rollover Forms.

### **IV. SETTLEMENT ADMINISTRATION COSTS**

13. Atticus agreed to provide administration services in this matter for \$16,500.

**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. Executed on this 28<sup>th</sup> day of July 2025 in Mendota Heights, Minnesota.**



Bryn Bradley

## **EXHIBIT A**

VI-JON ESOP SETTLEMENT  
C/O ATTICUS ADMINISTRATION  
PO BOX 64053  
SAINT PAUL MN 55164



<<barcode text>>

<<Claimant ID>> <<SEQ ID>>

<<FIRST NAME>> <<LAST NAME>>

<<ADDRESS>> <<ADDRESS 2>>

<<CITY>> <<STATE>> <<ZIP>>

**UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS**  
**NOTICE OF PENDING CLASS ACTION SETTLEMENT AND FAIRNESS HEARING**  
***Laidig v. GreatBanc Trust Company, Case No. 22-CV-01296 (N.D. Ill.)***

**This is a notice of a proposed partial class action settlement.**

If you participated in or received benefits from the Vi-Jon Employee Stock Ownership Plan (n/k/a Emprise Group, Inc. Employee Stock Ownership Plan), a class action lawsuit may affect your rights.

**A Federal Court authorized this Notice.**

**You are not being sued. This is not a solicitation from a lawyer.**

- A federal lawsuit alleges that GreatBanc Trust Company (“GreatBanc”), as a fiduciary to the Vi-Jon Employee Stock Ownership Plan n/k/a Emprise Group, Inc. Employee Stock Ownership Plan (“Plan”), caused the Plan to engage in a transaction prohibited by the Employee Retirement Income Security Act (“ERISA”). This case was filed on March 10, 2022 against GreatBanc, Berkshire Fund VI, L.P. (“Berkshire”), John G. Brunner, and the John G. Brunner Revocable Trust dated 06-09-1992 (collectively, “Defendants”).
- A partial Settlement has been reached that encompasses all claims in this case against John G. Brunner, the John G. Brunner Revocable Trust dated 06-09-1992, and 12 other Affiliated Family Trusts related to the Brunner family (collectively, the “Brunner Defendants”). The Brunner Defendants deny all claims, and nothing in the Settlement is an admission or concession on their part of any fault or liability whatsoever.
- The Court has not certified a class with regards to the rest of the Defendants and has not decided whether the Defendants did anything wrong. This partial Settlement does not affect the claims in this lawsuit against the non-settling Defendants.
- For the purposes of this Settlement only, the Settlement Class is defined as: All participants and beneficiaries of the Vi-Jon Employee Stock Ownership Plan (n/k/a Emprise Group, Inc. Employee Stock Ownership Plan) at any time since its inception with a vested Plan balance on or prior to October 29, 2024, excluding Defendants, the directors of Vi-Jon or of any entity in which a Defendant has a controlling interest, and legal representatives, successors, and assigns of any such excluded person.
- The Settlement will provide, among other things, for a \$1.0 million Gross Settlement Fund that will be allocated to eligible Settlement Class Members after any Court-approved deductions.
- The terms and conditions of the Settlement are set forth in the Settlement Agreement dated January 27, 2025. Capitalized terms used in this Notice but not defined in this Notice have the meanings assigned to them in the Settlement Agreement. The Settlement Agreement is available at [www.ViJonESOPSettlement.com](http://www.ViJonESOPSettlement.com). You should visit that website if you would like more information about the Settlement or the lawsuit. You may also call 800-291-5085 for additional information.
- Your rights and the choices available to you—and the applicable deadlines to act—are explained in this Notice.
- The Court still has to decide whether to approve the Settlement. Payments under the Settlement will be made only if the Court finally approves the Settlement, and that final approval is upheld in the event of any appeal.

- A Fairness Hearing will take place on August 12, 2025, at 10:15 a.m., before the Honorable Judge LaShonda A. Hunt, United States District Court for the Northern District of Illinois, 219 South Dearborn Street, Chicago, IL 60604, in Courtroom 1425, to determine whether to grant final approval of the Settlement and approve the requested Attorneys' Fees and Costs, Administrative Expenses, and Class Representative Service Awards. If the Fairness Hearing is rescheduled, or if it is held by video conference or telephone, a notice will be posted on the Settlement Website at [www.ViJonESOPSettlement.com](http://www.ViJonESOPSettlement.com).
- Any objections to the Settlement, or to the requested Attorneys' Fees and Costs, Administrative Expenses, or Class Representative Service Awards, must be served in writing on Class Counsel and counsel for the Brunner Defendants, as identified on page 5 of this Settlement Notice.

### YOUR LEGAL RIGHTS AND OPTIONS UNDER THE SETTLEMENT

**Our records indicate you are an Active ESOP Participant Class Member.**

**If so, you do not need to do anything to receive your share of the Settlement.**

**An Active ESOP Participant is a Class Member with an active account in the Plan as of May 13, 2025.**

**A Non-Active ESOP Participant is a Class Member *without* an active account in the Plan as of May 13, 2025.**

**Our records indicate that you are an Active ESOP Participant Class Member.** You do not need to do anything to receive your share of the Net Settlement Amount. Your distribution will be automatically deposited into your Plan account.

If, however, you are a Non-Active ESOP Participant Class Member who no longer has a Plan account then you may submit a Rollover Form postmarked on or before July 22, 2025 to receive a share of the Net Settlement Amount via rollover. If you are a Non-Active ESOP Participant Class Member and you do not mail the Non-Active ESOP Participant Rollover Form by the above deadline, you will receive your share of the Net Settlement Amount via check. If you believe you are a Non-Active ESOP Participant Class Member, a rollover form may be obtained by calling the Settlement Administrator at 800-291-5085 or by accessing [www.ViJonESOPSettlement.com](http://www.ViJonESOPSettlement.com).

**You can object to the Settlement (no later than July 22, 2025).**

If you wish to object to any part of the Settlement, or to the requested Attorneys' Fees and Costs, Administrative Expenses, or Class Representative Service Award, you must submit your objection and any supporting documents to Class Counsel and counsel for the Brunner Defendants (as identified on page 5 below) by July 22, 2025.

**You can attend a hearing on August 12, 2025 to discuss the fairness of the Settlement.**

You may also attend the Fairness Hearing on August 12, 2025. If you wish to attend and speak at the hearing, you must provide Class Counsel and counsel for the Brunner Defendants with notice of your intent to appear by July 22, 2025. Please note that you will not be permitted to make an objection to the Settlement if you do not comply with the requirements for making objections.



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## BASIC INFORMATION

### 1. Why did I get this Notice?

You are receiving this Notice because the Plan's records show that you participated in the Vi-Jon Employee Stock Ownership Plan (n/k/a Emprise Group, Inc. Employee Stock Ownership Plan) any time since its inception and had a vested Plan balance on or prior to October 29, 2024, and therefore are a member of the Settlement Class. This class action lawsuit is known as *Laidig v. GreatBanc Trust Company*, Case No. 22-CV-01296 (N.D. Ill.). The Honorable Judge LaShonda A. Hunt of the United States District Court for the Northern District of Illinois presides over this case and has preliminarily certified a class for the purposes of this Settlement. This Notice provides information about the lawsuit, how it may affect you, and your legal rights and options.

### 2. What is this lawsuit about?

This lawsuit is about whether GreatBanc violated ERISA by causing the Plan to engage in a transaction prohibited by ERISA, namely the sale of Vi-Jon for an allegedly excessive price to the Plan. Plaintiffs allege that the price and resulting debt adversely affect the value of Plan participants' retirement benefits. Plaintiffs also filed suit against Berkshire and the Brunner Defendants as transferees of the proceeds of the sale. You can read Plaintiff's First Amended Complaint at [www.ViJonESOPSettlement.com](http://www.ViJonESOPSettlement.com).

Defendants deny that they violated any law or duty owed to the Plan or its participants. Specifically, Defendants deny that the sale price for Vi-Jon was excessive and claim the sale was made for adequate consideration. The Defendants' respective Answers to the Amended Complaint are available at [www.ViJonESOPSettlement.com](http://www.ViJonESOPSettlement.com).

### 3. What is a class action and who is involved?

In a class action relating to a retirement plan such as this, one or more people called “Class Representatives” (in this case, Paul Laidig, Peter Lewis, and Derek Kemp, all vested participants in the Plan) sue on behalf of the plan and other people who have similar claims. These people are collectively called a “Class” or “Class Members.” The person who sued—and all Class Members like them—are called the “Plaintiffs.” The persons and entities they sued are called the Defendants. One court resolves the issues in the lawsuit for all of the Class Members and the Plan.

## THIS SETTLEMENT

### 4. Why is there a settlement?

The Court has not reached a final decision on the Class Representatives’ claims. Instead, the Class Representatives and the Brunner Defendants have agreed to the Settlement. The Settlement is the product of extensive negotiations between the Class Representatives, the Brunner Defendants, and their counsel. The parties to the Settlement have taken into account the uncertainty, risks, and costs of litigation and have concluded that it is desirable to settle on the terms and conditions set forth in the Settlement. The Class Representatives and Class Counsel believe that the Settlement is best for the Settlement Class. Nothing in the Settlement is an admission or concession by the Brunner Defendants of any fault or liability whatsoever. They have entered into the Settlement to avoid the uncertainty, expense, and burden of additional litigation.

### 5. What does the Settlement provide?

Under the Settlement, the Brunner Defendants will cause \$1,000,000 to be paid into a Qualified Settlement Fund to resolve the claims of the Settlement Class against them. The Net Settlement Amount (after deduction of any Court-approved Attorneys’ Fees and Costs, Administrative Expenses, and Class Representative Service Awards) will be allocated to Settlement Class Members according to a Plan of Allocation to be approved by the Court (as explained further below). Allocations to Active ESOP Participant Class Members who are entitled to a distribution under the Plan of Allocation will be made into their existing accounts in the Plan. Non-Active ESOP Participant Class Members who are entitled to a distribution may receive their distribution as a check or, if they choose, as a rollover to a qualified retirement account. All Settlement Class Members and anyone claiming through them will fully release the Brunner Defendants and other related entities from Plaintiffs’ Released Claims, as defined in the Settlement Agreement. The Released Claims include any claims against any of the Released Parties with respect to the Plan that were asserted in the lawsuit against the Brunner Defendants or could have been asserted against them. In addition, Plaintiffs’ Released Claims also include certain other claims as set forth in the Settlement Agreement. The Non-Settling Defendants are not Released Parties under the Settlement and this case will continue against them. This is *only a summary* of terms of the Settlement, not a binding description of the award or releases. The full language of the Settlement Agreement is available at [www.ViJonESOPSettlement.com](http://www.ViJonESOPSettlement.com).

### 6. How much money will I receive from the Settlement?

The amount, if any, that will be allocated to you will be based upon records maintained by the Plan’s recordkeeper. Calculations regarding individual distributions will be performed by the Settlement Administrator, whose determinations will be final and binding, pursuant to the Court-approved Plan of Allocation. To receive a distribution from the Net Settlement Amount, you must either be (1) an Active ESOP Participant Class Member, (2) a Non-Active ESOP Participant Class Member, or (3) a Beneficiary or Alternate Payee of a person identified in (1) or (2). Definitions for (1) and (2) are provided on page 2. There are approximately 1,200 Settlement Class Members. The Net Settlement Amount will be divided *pro rata* among Settlement Class Members by dividing each individual’s number of vested shares of Company stock by the total number of vested shares of Company stock allocated to the ESOP accounts of all Settlement Class Members on or prior to October 29, 2024, and multiplying that Entitlement Percentage by the Net Proceeds of the Settlement. If the dollar amount of the settlement payment to a Non-Active ESOP Participant Class Member is calculated by the Settlement Administrator to be less than \$10.00, then that Non-Active ESOP Participant Class Member’s *pro rata* share shall be zero for all purposes, and their share shall be reallocated among the other Class Members. Class Members whose pro-rata shares are zero will still be bound by their release of claims. A more complete description regarding the details of the Plan of Allocation can be found in Article V of the Settlement Agreement, which is available at [www.ViJonESOPSettlement.com](http://www.ViJonESOPSettlement.com).

## 7. How can I receive my distribution from the Settlement?

According to our records, you are an **Active ESOP Participant Class Member**. Therefore, you do not need to do anything to receive your share of the Net Settlement Amount. If this is not correct, you should contact the Settlement Administrator to obtain a Non-Active ESOP Participant Rollover Form if you wish to elect a rollover to a tax-qualified retirement account. The Rollover Form will explain the steps necessary to receive your distribution via rollover. If you are a Non-Active ESOP Participant Class Member but do not submit a timely, valid Rollover Form, you will receive your distribution via check. If you are currently an Active ESOP Participant, but no longer have a Plan Account at the time of distribution, you will receive a check.

## YOUR RIGHTS AND OPTIONS

## 8. Can I get out of the Settlement?

In the event the Court enters a final order approving the Settlement and certifying the Settlement Class, you will be automatically included if you are a Class Member. This Settlement will resolve the legal claims in the lawsuit for all Class Members against the Brunner Defendants. You do not have the option to exclude yourself from the Settlement if the Court approves it. However, because this Settlement is only with the Brunner Defendants, this partial Settlement has no effect on your rights with regard to the Non-Settling Defendants.

## 9. How do I tell the Court if I don't approve of the Settlement?

If you wish to object to approval of the Settlement, you may submit your objection, in writing, to the Court and counsel for the Plaintiffs and Brunner Defendants parties at the addresses below:

Court	Class Counsel	Defendants' Counsel
Clerk of the Court United States District Court Northern District of Illinois 219 South Dearborn Street Chicago, IL 60604	Paul J. Lukas Nichols Kaster, PLLP 4700 IDS Center 80 S 8th Street Minneapolis, MN 55402 612-256-3200 lukas@nka.com	Richard J. Pearl Faegre Drinker Biddle & Reath LLP 320 S. Canal St., Ste. 3300 Chicago, IL 60606 312-569-1000 rick.pearl@faegredrinker.com

In order for an objection to be considered by the Court, it must be postmarked by July 22, 2025. The objection must be in writing and should include the case name *Laidig v. GreatBanc Trust Company*, Case No. 22-CV-01296 (N.D. Ill.), and also include: (a) your name; (b) your address; (c) a statement that you are a member of the Class; (d) the specific grounds for the objection (including all arguments, citations, and evidence supporting the objection); (e) all documents or writings that you desire the Court to consider (including all copies of any documents relied upon in the objection); (f) your signature; and (g) a statement indicating whether you intend to appear at the Fairness Hearing.

## 10. When and where will the court decide whether to approve the Settlement?

The Court will hold a Fairness Hearing on August 12, 2025, at 10:15 a.m., before the Honorable Judge LaShonda A. Hunt, United States District Court for the Northern District of Illinois, Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604, in Courtroom 1425, to determine whether to grant final approval of the Settlement and approve the requested Attorneys' Fees and Costs, Administrative Expenses, and Class Representative Service Awards. If the Fairness Hearing is rescheduled, or if it is held by video conference or telephone, a notice will be posted on the Settlement Website at [www.ViJonESOPSettlement.com](http://www.ViJonESOPSettlement.com).

## 11. Do I have to attend the Fairness Hearing?

No, but you are welcome to come at your own expense. You may also make an appearance through an attorney. If you send an objection, you do not have to come to the Court to talk about it. As long as you mail your written objection on time, the Court will consider it.

**12. May I speak at the Fairness Hearing?**

Yes. If you wish to attend and speak at the hearing, you must serve Class Counsel and counsel for the Brunner Defendants (as identified above on page 5) with a notice of intent to appear by July 22, 2025. You must also comply with the requirements for making an objection (described above on page 5) if you wish to object to the Settlement.

**13. What happens if I do nothing at all?**

**If you are an Active ESOP Participant Class Member as described on page 2 and do nothing, you will receive your pro rata share of the Net Settlement Amount directly into your Plan account if the Settlement is finally approved.** If you are a Non-Active ESOP Participant Class Member as described on page 2 and do nothing, you will receive your pro rata share of the Net Settlement Amount via check if the Settlement is finally approved.

**THE LAWYERS REPRESENTING YOU****14. Do I have a lawyer in this case?**

The Court has appointed the law firms of Nichols Kaster, PLLP, and Bailey & Glasser, LLP as Class Counsel for the purposes of this Settlement, which means that they represent all of the Class Members in connection with this Settlement. They are experienced in handling class action lawsuits. More information about these law firms, their practices, and their lawyers' experience is available at [www.nka.com](http://www.nka.com) and [www.baileyglasser.com](http://www.baileyglasser.com).

**15. Should I get my own lawyer?**

You do not need to hire your own lawyer because Class Counsel is working on your behalf. You can hire your own lawyer to appear in court for you, if you so desire, but you will have to pay that lawyer.

**16. How will the lawyers be paid?**

Class Counsel will ask the Court to award attorney's fees and expenses for their work in the case. The amount of any fees requested will not exceed one-third of the Settlement Fund. Class Counsel also will seek to recover their litigation costs and administrative expenses associated with the Settlement. Any deductions awarded by the Court will be paid from the Settlement Fund. Class Counsel also will ask the Court to approve payments, not to exceed \$5,000, for each Class Representative as compensation for their service to the Class. Any Class Representative Service Award approved by the Court will be paid from the Settlement Fund. A formal application for Attorneys' Fees and Costs, Administrative Expenses, and Class Representative Service Awards will be filed with the Court on or before July 8, 2025, and will be posted on the settlement website.

**GETTING MORE INFORMATION****17. Are more details available?**

For more information, visit the website [www.ViJonESOPSettlement.com](http://www.ViJonESOPSettlement.com), where you can find the First Amended Complaint, the Defendants' Answers to the First Amended Complaint, the Court's Order denying Defendants' motion to dismiss, and the filings related to this Settlement. You may also contact Class Counsel by calling 612-256-3200, or writing to Class Counsel as follows:

NICHOLS KASTER, PLLP  
Attn: Paul Lukas  
4700 IDS Center, 80 S Eighth Street  
Minneapolis, MN 55402

BAILEY & GLASSER, LLP  
Attn: Gregory Y. Porter  
1055 Thomas Jefferson Street NW, Ste. 540  
Washington, D.C. 20007

**EXHIBIT B**

VI-JON ESOP SETTLEMENT  
C/O ATTICUS ADMINISTRATION  
PO BOX 64053  
SAINT PAUL MN 55164



<<barcode text>>

<<Claimant ID>> <<SEQ ID>>

<<FIRST NAME>> <<LAST NAME>>

<<ADDRESS>> <<ADDRESS 2>>

<<CITY>> <<STATE>> <<ZIP>>

## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

### NOTICE OF PENDING CLASS ACTION SETTLEMENT AND FAIRNESS HEARING

*Laidig v. GreatBanc Trust Company*, Case No. 22-CV-01296 (N.D. Ill.)

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**A Federal Court authorized this Notice.**

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- A federal lawsuit alleges that GreatBanc Trust Company (“GreatBanc”), as a fiduciary to the Vi-Jon Employee Stock Ownership Plan n/k/a Emprise Group, Inc. Employee Stock Ownership Plan (“Plan”), caused the Plan to engage in a transaction prohibited by the Employee Retirement Income Security Act (“ERISA”). This case was filed on March 10, 2022 against GreatBanc, Berkshire Fund VI, L.P. (“Berkshire”), John G. Brunner, and the John G. Brunner Revocable Trust dated 06-09-1992 (collectively, “Defendants”).
- A partial Settlement has been reached that encompasses all claims in this case against John G. Brunner, the John G. Brunner Revocable Trust dated 06-09-1992, and 12 other Affiliated Family Trusts related to the Brunner family (collectively, the “Brunner Defendants”). The Brunner Defendants deny all claims, and nothing in the Settlement is an admission or concession on their part of any fault or liability whatsoever.
- The Court has not certified a class with regards to the rest of the Defendants and has not decided whether the Defendants did anything wrong. This partial Settlement does not affect the claims in this lawsuit against the non-settling Defendants.
- For the purposes of this Settlement only, the Settlement Class is defined as: All participants and beneficiaries of the Vi-Jon Employee Stock Ownership Plan (n/k/a Emprise Group, Inc. Employee Stock Ownership Plan) at any time since its inception with a vested Plan balance on or prior to October 29, 2024, excluding Defendants, the directors of Vi-Jon or of any entity in which a Defendant has a controlling interest, and legal representatives, successors, and assigns of any such excluded person.
- The Settlement will provide, among other things, for a \$1.0 million Gross Settlement Fund that will be allocated to eligible Settlement Class Members after any Court-approved deductions.
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- The Court still has to decide whether to approve the Settlement. Payments under the Settlement will be made only if the Court finally approves the Settlement, and that final approval is upheld in the event of any appeal.
- A Fairness Hearing will take place on August 12, 2025, at 10:15 a.m., before the Honorable Judge LaShonda A. Hunt, United States District Court for the Northern District of Illinois, 219 South Dearborn Street, Chicago, IL 60604, in Courtroom 1425, to determine whether to grant final approval of the Settlement and approve the requested Attorneys' Fees and Costs, Administrative Expenses, and Class Representative Service Awards. If the Fairness Hearing is rescheduled, or if it is held by video conference or telephone, a notice will be posted on the Settlement Website at [www.ViJonESOPSettlement.com](http://www.ViJonESOPSettlement.com).
- Any objections to the Settlement, or to the requested Attorneys' Fees and Costs, Administrative Expenses, or Class Representative Service Awards, must be served in writing on Class Counsel and counsel for the Brunner Defendants, as identified on page 5 of this Settlement Notice.

### YOUR LEGAL RIGHTS AND OPTIONS UNDER THE SETTLEMENT

**Our records indicate you are a Non-Active ESOP Participant Class Member.**

**If so, you do not need to do anything to receive your share of the Settlement.**

**A Non-Active ESOP Participant is Class Member *without* an active account in the Plan as of May 13, 2025.**

**An Active ESOP Participant is a Class Member with an active account in the Plan as of May 13, 2025.**

**Our records indicate that you are a Non-Active ESOP Participant Class Member.** That is, you no longer have an active account in the Plan. If you wish to receive your share of the Net Settlement Amount as a rollover to a qualified retirement plan, you must submit a Rollover Form postmarked on or before July 22, 2025 to receive your distribution via rollover. If you are a Non-Active ESOP Participant Class Member and do not submit a Rollover Form by the above deadline, you will receive your share of the Net Settlement Amount via check.

If you believe you are an Active ESOP Participant Class Member, that is you have an active Plan Account, you should contact the Settlement Administrator at 800-291-5085 or by accessing [www.vijonesopsettlement.com](http://www.vijonesopsettlement.com).

**You can object to the Settlement (no later than July 22, 2025).**

If you wish to object to any part of the Settlement, or to the requested Attorneys' Fees and Costs, Administrative Expenses, or Class Representative Service Award, you must submit your objection and any supporting documents to Class Counsel and counsel for the Brunner Defendants (as identified on page 5 below) by July 22, 2025.

**You can attend a hearing on August 12, 2025 to discuss the fairness of the Settlement.**

You may also attend the Fairness Hearing on August 12, 2025. If you wish to attend and speak at the hearing, you must provide Class Counsel and counsel for the Brunner Defendants with notice of your intent to appear by July 22, 2025. Please note that you will not be permitted to make an objection to the Settlement if you do not comply with the requirements for making objections.



<b>WHAT THIS NOTICE CONTAINS</b>
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## BASIC INFORMATION

<b>1. Why did I get this Notice?</b>
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You are receiving this Notice because the Plan's records show that you participated in the Vi-Jon Employee Stock Ownership Plan (n/k/a Emprise Group, Inc. Employee Stock Ownership Plan) any time since its inception and had a vested Plan balance on or prior to October 29, 2024, and therefore are a member of the Settlement Class. This class action lawsuit is known as *Laidig v. GreatBanc Trust Company*, Case No. 22-CV-01296 (N.D. Ill.). The Honorable Judge LaShonda A. Hunt of the United States District Court for the Northern District of Illinois presides over this case and has preliminarily certified a class for the purposes of this Settlement. This Notice provides information about the lawsuit, how it may affect you, and your legal rights and options.

<b>2. What is this lawsuit about?</b>
---------------------------------------

This lawsuit is about whether GreatBanc violated ERISA by causing the Plan to engage in a transaction prohibited by ERISA, namely the sale of Vi-Jon for an allegedly excessive price to the Plan. Plaintiffs allege that the price and resulting debt adversely affect the value of Plan participants' retirement benefits. Plaintiffs also filed suit against Berkshire and the Brunner Defendants as transferees of the proceeds of the sale. You can read Plaintiff's First Amended Complaint at [www.ViJonESOPSettlement.com](http://www.ViJonESOPSettlement.com).

Defendants deny that they violated any law or duty owed to the Plan or its participants. Specifically, Defendants deny that the sale price for Vi-Jon was excessive and claim the sale was made for adequate consideration. The Defendants' respective Answers to the Amended Complaint are available at [www.ViJonESOPSettlement.com](http://www.ViJonESOPSettlement.com).



**3. What is a class action and who is involved?**

In a class action relating to a retirement plan such as this, one or more people called “Class Representatives” (in this case, Paul Laidig, Peter Lewis, and Derek Kemp, all vested participants in the Plan) sue on behalf of the plan and other people who have similar claims. These people are collectively called a “Class” or “Class Members.” The person who sued—and all Class Members like them—are called the “Plaintiffs.” The persons and entities they sued are called the Defendants. One court resolves the issues in the lawsuit for all of the Class Members and the Plan.

**THIS SETTLEMENT****4. Why is there a settlement?**

The Court has not reached a final decision on the Class Representatives’ claims. Instead, the Class Representatives and the Brunner Defendants have agreed to the Settlement. The Settlement is the product of extensive negotiations between the Class Representatives, the Brunner Defendants, and their counsel. The parties to the Settlement have taken into account the uncertainty, risks, and costs of litigation and have concluded that it is desirable to settle on the terms and conditions set forth in the Settlement. The Class Representatives and Class Counsel believe that the Settlement is best for the Settlement Class. Nothing in the Settlement is an admission or concession by the Brunner Defendants of any fault or liability whatsoever. They have entered into the Settlement to avoid the uncertainty, expense, and burden of additional litigation.

**5. What does the Settlement provide?**

Under the Settlement, the Brunner Defendants will cause \$1,000,000 to be paid into a Qualified Settlement Fund to resolve the claims of the Settlement Class against them. The Net Settlement Amount (after deduction of any Court-approved Attorneys’ Fees and Costs, Administrative Expenses, and Class Representative Service Awards) will be allocated to Settlement Class Members according to a Plan of Allocation to be approved by the Court (as explained further below). Allocations to Active ESOP Participant Class Members who are entitled to a distribution under the Plan of Allocation will be made into their existing accounts in the Plan. Non-Active ESOP Participant Class Members who are entitled to a distribution may receive their distribution as a check or, if they choose, as a rollover to a qualified retirement account. All Settlement Class Members and anyone claiming through them will fully release the Brunner Defendants and other related entities from Plaintiffs’ Released Claims, as defined in the Settlement Agreement. The Released Claims include any claims against any of the Released Parties with respect to the Plan that were asserted in the lawsuit against the Brunner Defendants or could have been asserted against them. In addition, Plaintiffs’ Released Claims also include certain other claims as set forth in the Settlement Agreement. The Non-Settling Defendants are not Released Parties under the Settlement and this case will continue against them. This is *only a summary* of terms of the Settlement, not a binding description of the award or releases. The full language of the Settlement Agreement is available at [www.ViJonESOPSettlement.com](http://www.ViJonESOPSettlement.com).

**6. How much money will I receive from the Settlement?**

The amount, if any, that will be allocated to you will be based upon records maintained by the Plan’s recordkeeper. Calculations regarding individual distributions will be performed by the Settlement Administrator, whose determinations will be final and binding, pursuant to the Court-approved Plan of Allocation. To receive a distribution from the Net Settlement Amount, you must either be (1) an Active ESOP Participant Class Member, (2) a Non-Active ESOP Participant Class Member, or (3) a Beneficiary or Alternate Payee of a person identified in (1) or (2). Definitions for (1) and (2) are provided on page 2. There are approximately 1,200 Settlement Class Members. The Net Settlement Amount will be divided *pro rata* among Settlement Class Members by dividing each individual’s number of vested shares of Company stock by the total number of vested shares of Company stock allocated to the ESOP accounts of all Settlement Class Members on or prior to October 29, 2024, and multiplying that Entitlement Percentage by the Net Proceeds of the Settlement. If the dollar amount of the settlement payment to a Non-Active ESOP Participant Class Member is calculated by the Settlement Administrator to be less than \$10.00, then that Non-Active ESOP Participant Class Member’s *pro rata* share shall be zero for all purposes, and their share shall be reallocated among the other Class Members. Class Members whose pro-rata shares are zero will still be bound by their release of claims. A more complete description regarding the details of the Plan of Allocation can be found in Article V of the Settlement Agreement, which is available at [www.ViJonESOPSettlement.com](http://www.ViJonESOPSettlement.com).

**7. How can I receive my distribution from the Settlement?**

According to our records, you are a **Non-Active ESOP Participant Class Member**. If you wish to receive your Settlement distribution as a rollover to a tax-qualified retirement account, you must submit a Rollover Form by July 22, 2025. If you do not submit a Rollover Form by that deadline, you will receive your Settlement distribution via check. If this is not correct, and believe you are an Active ESOP Participant Class Member, you should contact the Settlement Administrator at 800-291-5085 or by accessing [www.vijonesopsettlement.com](http://www.vijonesopsettlement.com). Active ESOP Participants will receive their Settlement distributions as direct deposits into their Plan Accounts. If you are currently an Active ESOP Participant, but no longer have a Plan Account at the time of distribution, you will receive a check.

**YOUR RIGHTS AND OPTIONS****8. Can I get out of the Settlement?**

In the event the Court enters a final order approving the Settlement and certifying the Settlement Class, you will be automatically included if you are a Class Member. This Settlement will resolve the legal claims in the lawsuit for all Class Members against the Brunner Defendants. You do not have the option to exclude yourself from the Settlement if the Court approves it. However, because this Settlement is only with the Brunner Defendants, this partial Settlement has no effect on your rights with regard to the Non-Settling Defendants.

**9. How do I tell the Court if I don't approve of the Settlement?**

If you wish to object to approval of the Settlement, you may submit your objection, in writing, to the Court and counsel for the Plaintiffs and Brunner Defendants parties at the addresses below:

<b>Court</b>	<b>Class Counsel</b>	<b>Defendants' Counsel</b>
Clerk of the Court United States District Court Northern District of Illinois 219 South Dearborn Street Chicago, IL 60604	Paul J. Lukas Nichols Kaster, PLLP 4700 IDS Center 80 S 8th Street Minneapolis, MN 55402 612-256-3200 <a href="mailto:lukas@nka.com">lukas@nka.com</a>	Richard J. Pearl Faegre Drinker Biddle & Reath LLP 320 S. Canal St., Ste. 3300 Chicago, IL 60606 312-569-1000 <a href="mailto:rick.pearl@faegredrinker.com">rick.pearl@faegredrinker.com</a>

In order for an objection to be considered by the Court, it must be postmarked by July 22, 2025. The objection must be in writing and should include the case name *Laidig v. GreatBanc Trust Company*, Case No. 22-CV-01296 (N.D. Ill.), and also include: (a) your name; (b) your address; (c) a statement that you are a member of the Class; (d) the specific grounds for the objection (including all arguments, citations, and evidence supporting the objection); (e) all documents or writings that you desire the Court to consider (including all copies of any documents relied upon in the objection); (f) your signature; and (g) a statement indicating whether you intend to appear at the Fairness Hearing.

**10. When and where will the court decide whether to approve the Settlement?**

The Court will hold a Fairness Hearing on August 12, 2025, at 10:15 a.m., before the Honorable Judge LaShonda A. Hunt, United States District Court for the Northern District of Illinois, Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604, in Courtroom 1425, to determine whether to grant final approval of the Settlement and approve the requested Attorneys' Fees and Costs, Administrative Expenses, and Class Representative Service Awards. If the Fairness Hearing is rescheduled, or if it is held by video conference or telephone, a notice will be posted on the Settlement Website at [www.vijonesopsettlement.com](http://www.vijonesopsettlement.com).

**11. Do I have to attend the Fairness Hearing?**

No, but you are welcome to come at your own expense. You may also make an appearance through an attorney. If you send an objection, you do not have to come to the Court to talk about it. As long as you mail your written objection on time, the Court will consider it.

**12. May I speak at the Fairness Hearing?**

Yes. If you wish to attend and speak at the hearing, you must serve Class Counsel and counsel for the Brunner Defendants (as identified above on page 5) with a notice of intent to appear by July 22, 2025. You must also comply with the requirements for making an objection (described above on page 5) if you wish to object to the Settlement.

**13. What happens if I do nothing at all?**

**If you are a Non-Active ESOP Participant Class Member as described on page 2 and do nothing, you will receive your pro rata share of the Net Settlement Amount via check if the Settlement is finally approved.** If you are an Active ESOP Participant Class Member as described on page 2 and do nothing, you will receive your pro rata share of the Net Settlement Amount directly into your Plan account if the Settlement is finally approved.

**THE LAWYERS REPRESENTING YOU****14. Do I have a lawyer in this case?**

The Court has appointed the law firms of Nichols Kaster, PLLP, and Bailey & Glasser, LLP as Class Counsel for the purposes of this Settlement, which means that they represent all of the Class Members in connection with this Settlement. They are experienced in handling class action lawsuits. More information about these law firms, their practices, and their lawyers' experience is available at [www.nka.com](http://www.nka.com) and [www.baileyglasser.com](http://www.baileyglasser.com).

**15. Should I get my own lawyer?**

You do not need to hire your own lawyer because Class Counsel is working on your behalf. You can hire your own lawyer to appear in court for you, if you so desire, but you will have to pay that lawyer.

**16. How will the lawyers be paid?**

Class Counsel will ask the Court to award attorney's fees and expenses for their work in the case. The amount of any fees requested will not exceed one-third of the Settlement Fund. Class Counsel also will seek to recover their litigation costs and administrative expenses associated with the Settlement. Any deductions awarded by the Court will be paid from the Settlement Fund. Class Counsel also will ask the Court to approve payments, not to exceed \$5,000, for each Class Representative as compensation for their service to the Class. Any Class Representative Service Award approved by the Court will be paid from the Settlement Fund. A formal application for Attorneys' Fees and Costs, Administrative Expenses, and Class Representative Service Awards will be filed with the Court on or before July 8, 2025, and will be posted on the settlement website.

**GETTING MORE INFORMATION****17. Are more details available?**

For more information, visit the website [www.ViJonESOPSettlement.com](http://www.ViJonESOPSettlement.com), where you can find the First Amended Complaint, the Defendants' Answers to the First Amended Complaint, the Court's Order denying Defendants' motion to dismiss, and the filings related to this Settlement. You may also contact Class Counsel by calling 612-256-3200, or writing to Class Counsel as follows:

NICHOLS KASTER, PLLP

Attn: Paul Lukas

4700 IDS Center, 80 S Eighth Street Minneapolis,  
MN 55402

BAILEY & GLASSER, LLP

Attn: Gregory Y. Porter

1055 Thomas Jefferson Street NW, Ste. 540  
Washington, D.C. 20007

**Vi-Jon Employee Stock Ownership Plan  
(n/k/a Emprise Group, Inc. Employee Stock Ownership Plan)  
c/o Atticus Administration  
PO Box 64053  
Saint Paul, MN 55164  
800-291-5085  
www.ViJonESOPSettlement.com  
NON-ACTIVE ESOP PARTICIPANT ROLLOVER FORM**

<<FIRST NAME>> <<MIDDLE NAME>> <<LAST NAME>>

Claim Number: <<CLAIMANT\_ID>>

<<ADDRESS 1>> <<ADDRESS 2>>

<<CITY>>, <<ST>> <<ZIP>>

This Non-Active ESOP Participant Rollover Form is **ONLY** for Settlement Class Members who are **Non-Active ESOP Participants**, or the Beneficiaries or Alternate Payees of Non-Active ESOP Participants, of the Vi-Jon Employee Stock Ownership Plan, now known as the Emprise Group, Inc. Employee Stock Ownership Plan (the “Plan”). A Non-Active ESOP Participant is a Class Member who had a vested Plan balance at any time since the Plan’s inception and on or prior to October 29, 2024, but who no longer had an Active Plan Account at the time of the Court’s order preliminarily approving the Settlement.

**Non-Active ESOP Participants who would like to elect to receive their settlement payment through a rollover to a qualified retirement account must complete, sign, and mail this form with a postmark on or before July 22, 2025.** Please review the instructions below carefully. **Non-Active ESOP Participants who do not complete and timely return this form will receive their settlement payment via check.** If you have questions regarding this form, you may contact the Settlement Administrator as indicated below:

**Vi-Jon (n/k/a Emprise Group, Inc.) Employee Stock Ownership Plan  
c/o Atticus Administration  
PO Box 64053  
Saint Paul, MN, 55164  
Telephone: 800-291-5085  
www.ViJonESOPSettlement.com**

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**PART 1: INSTRUCTIONS FOR COMPLETING NON-ACTIVE ESOP PARTICIPANT ROLLOVER FORM**

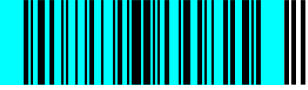
1. If you would like to receive your settlement payment through a rollover to a qualified retirement account, complete this Rollover Form. You should also keep a copy of all pages of your Non-Active ESOP Participant Rollover Form, including the first page with the address label, for your records.
2. **Mail your completed Non-Active ESOP Participant Rollover Form postmarked on or before July 22, 2025 to the Settlement Administrator at the following address:**

**Vi-Jon (n/k/a Emprise Group, Inc.) Employee Stock Ownership Plan  
c/o Atticus Administration  
PO Box 64053  
Saint Paul, MN, 55164**

**It is your responsibility to ensure the Settlement Administrator has timely received your Non-Active ESOP Participant Rollover Form.**

3. Other Reminders:
  - You must provide date of birth, signature, and a completed Substitute IRS Form W-9, which is attached as Part 5 to this form.
  - If you desire to do a rollover and you fail to complete all of the rollover information in Part 4, below, payment will be made to you by check.
  - If you change your address after sending in your Non-Active ESOP Participant Rollover Form, please provide your new address to the Settlement Administrator.
  - **Timing of Payments to Eligible Settlement Class Members.** The timing of the distribution of the settlement payments are conditioned on several matters, including the Court's final approval of the Settlement and any approval becoming final and no longer subject to any appeals in any court. An appeal of the final approval order may take several years. If the Settlement is approved by the Court, and there are no appeals, the settlement distribution likely will occur within six months of the Court's Final Approval Order.
4. **Questions?** If you have any questions about this Non-Active ESOP Participant Rollover Form, please call the Settlement Administrator at 800-291-5085. The Settlement Administrator will provide advice only regarding completing this form and will not provide financial, tax or other advice concerning the Settlement. You therefore may want to consult with your financial or tax advisor. Information about the status of the approval of the Settlement and the settlement administration is available on the settlement website, [www.ViJonESOPSettlement.com](http://www.ViJonESOPSettlement.com).

VI-JON ESOP SETTLEMENT  
C/O ATTICUS ADMINISTRATION  
PO BOX 64053  
SAINT PAUL MN 55164



<<barcode text>>

## PART 2: PARTICIPANT INFORMATION

First Name	Middle	Last Name
<input type="text"/>	<input type="text"/>	<input type="text"/>
Mailing Address		
<input type="text"/>		
City	State	Zip Code
<input type="text"/>	<input type="text"/>	<input type="text"/>
Home Phone	Work Phone or Cell Phone	
<input type="text"/>	<input type="text"/>	
Participant's Social Security Number	Participant's Date of Birth	
<input type="text"/>	<input type="text"/>	
Email Address	M M D D Y Y Y Y	
<input type="text"/>		

[NON-ACTIVE ESOP PARTICIPANT ROLLOVER FORM CONTINUES ON THE NEXT PAGE]

**PART 3: BENEFICIARY OR ALTERNATE PAYEE INFORMATION (IF APPLICABLE)**

- ☐ Check here if you are the **surviving spouse or other beneficiary** for the Non-Active ESOP Participant Class Member and the Non-Active ESOP Participant Class Member is deceased. **Documentation must be provided showing current authority of the representative to file on behalf of the deceased.** Please complete the information below and then continue on to Parts 4 and 5 on the next page.
- ☐ Check here if you are an alternate payee under a qualified domestic relations order (QDRO). The Settlement Administrator may contact you with further instructions. Please complete the information below and then continue on to Parts 4 and 5 on the next page.

First Name	Middle	Last Name
<input type="text"/>	<input type="text"/>	<input type="text"/>
Mailing Address		
<input type="text"/>		
City	State	Zip Code
<input type="text"/>	<input type="text"/>	<input type="text"/>
Home Phone	Work Phone or Cell Phone	
<input type="text"/>	<input type="text"/>	
Participant's Social Security Number	Participant's Date of Birth	
<input type="text"/>	<input type="text"/>	
Email Address	M M	D D Y Y Y Y
<input type="text"/>		

[NON-ACTIVE ESOP PARTICIPANT ROLLOVER FORM CONTINUES ON THE NEXT PAGE]

## PART 4: PAYMENT ELECTION

☐ Government 457(b)
 ☐ 401(a)/401(k)
 ☐ 403(b)

☐ Direct Rollover to a Traditional IRA
 ☐ Direct Rollover to a Roth IRA (subject to ordinary income tax)

Company or Trustee's Name (to whom the check should be made payable)

Company or Trustee's Mailing Address 1

Company or Trustee's Mailing Address 2

Company or Trustee's City

State

Zip Code

Your Account Number

Company or Trustee's Phone Number

## PART 5: SIGNATURE, CONSENT, AND SUBSTITUTE IRS FORM W-9

1. The Social Security Number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me); and
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and
3. I am a U.S. person (including a U.S. resident alien).

[illegible]**Date Signed (Required)**



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