

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

CITY OF SUNRISE GENERAL
EMPLOYEES' RETIREMENT PLAN,
on behalf of itself and all others
similarly situated,

Plaintiff,

v.

FLEETCOR TECHNOLOGIES, INC.,
RONALD F. CLARKE, and ERIC R.
DEY,

Defendants.

Civ. A. No. 1:17-cv-02207-LMM

CLASS ACTION

**LEAD PLAINTIFF'S UNOPPOSED MOTION
FOR APPROVAL OF DISTRIBUTION PLAN**

Lead Plaintiff, City of Sunrise General Employees' Retirement Plan ("Lead Plaintiff"), hereby moves this Court for approval of its distribution plan pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Order Approving Plan of Allocation of Net Settlement Fund entered April 15, 2020 (ECF No. 109). In further support of this motion, Lead Plaintiff submits (i) the accompanying Memorandum in Support of Lead Plaintiff's Unopposed Motion for Approval of Distribution Plan; (ii) the accompanying Declaration of Alexander Villanova in Support of Lead

Plaintiff's Unopposed Motion for Approval of Distribution Plan (the "Villanova Declaration")¹ submitted on behalf of the Court-approved Claims Administrator, Epiq Class Action and Claims Solutions, Inc. ("Epiq"); and (iii) all other papers and proceedings herein, for entry of the accompanying [Proposed] Order Approving Distribution Plan (the "Class Distribution Order").

Among other things, the Class Distribution Order would: (i) approve the administrative determinations of Epiq, accepting and rejecting Claims submitted in connection with the Settlement reached in the above-captioned Action as stated in the Villanova Declaration; (ii) direct the distribution of the Net Settlement Fund to Claimants whose Claims are accepted by Epiq as valid and approved by the Court ("Authorized Claimants"), while maintaining a Reserve for any tax liability and claims administration-related contingencies that may arise; (iii) direct that distribution checks state that the check must be cashed within 90 days after the issue date; (iv) direct that Authorized Claimants will forfeit all recovery from the Settlement if they fail to cash their distribution checks in a timely manner; (v) approve the recommended plan for any funds remaining after the distribution; (vi)

¹ All terms with initial capitalization not otherwise defined herein have the meanings ascribed to them in the Villanova Declaration or in the Stipulation and Agreement of Settlement dated as of November 6, 2019 (ECF No. 96-2) (the "Stipulation").

approve Epiq's fees and expenses incurred and estimated to be incurred in the administration of the Settlement; (vii) release claims related to the administration process; and (viii) authorize the destruction of Claim Forms and supporting documents at an appropriate time. Pursuant to the terms of the Stipulation, this Motion is unopposed by Defendants.

There are no disputed Claims by any Class Member requiring Court review. As such, the Motion is ripe for determination. As this matter is fully briefed before the Court, a hearing on this motion is not required. Lead Counsel respectfully requests that this motion be decided on the papers.

Dated: February 3, 2021

Respectfully submitted,

/s/ Katherine M. Sinderson

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RULE 7.1(D) CERTIFICATE

The undersigned counsel certifies that this document has been prepared with 14-point Times New Roman, one of the font and point selections approved by the Court in Local Rule 5.1(C).

/s/ Katherine M. Sinderson
Katherine M. Sinderson

CERTIFICATE OF SERVICE

I hereby certify that on February 3, 2021, I caused a true and correct copy of the foregoing to be filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing and make available the same to all attorneys or record.

/s/ Katherine M. Sinderson
Katherine M. Sinderson