

**UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT**

LOUISIANA MUNICIPAL POLICE
EMPLOYEES' RETIREMENT SYSTEM,
SJUNDE AP-FONDEN, BOARD OF TRUSTEES OF
THE CITY OF FORT LAUDERDALE GENERAL
EMPLOYEES' RETIREMENT SYSTEM,
EMPLOYEES' RETIREMENT
SYSTEM OF THE GOVERNMENT OF THE VIRGIN
ISLANDS, AND PUBLIC EMPLOYEES'
RETIREMENT SYSTEM OF MISSISSIPPI
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

GREEN MOUNTAIN COFFEE ROASTERS,
INC., LAWRENCE J. BLANFORD and
FRANCES G. RATHKE,

Defendants.

No. 2:11-CV-00289-WKS

**CLASS REPRESENTATIVES' UNOPPOSED MOTION
FOR APPROVAL OF DISTRIBUTION PLAN**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Order Approving Plan of Allocation of Net Settlement Fund entered October 22, 2018 (ECF No. 351), and upon (i) the accompanying Memorandum in Support of Class Representatives' Unopposed Motion for Approval of Distribution Plan; (ii) the accompanying Declaration of Alexander Villanova in Support of Class Representatives' 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, Class Representatives Louisiana Municipal Police Employees’ Retirement System, Sjunde AP-Fonden, Board of Trustees of the City of Fort Lauderdale General Employees’ Retirement System, Employees’ Retirement System of the Government of the Virgin Islands, and Public Employees’ Retirement System of Mississippi (collectively, “Class Representatives”), on behalf of themselves and the certified Class, will and do hereby move this Court for entry of the accompanying [Proposed] Order Approving Distribution Plan (the “Class Distribution Order”), which would, *inter alia*: (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) 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 Proof of Claim Forms and supporting documents at an appropriate time. Pursuant to the terms of the Stipulation, this Motion is unopposed by Defendants.

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 June 18, 2018 (ECF No. 336-1) (the “Stipulation”).

There are no disputed Claims by any Class Member requiring Court review. As such, the Motion is ripe for determination.

Dated: January 14, 2020

Respectfully submitted,

/s/ John C. Browne

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