

1 Application Deadline” under Section 6.4.6 of the Settlement Agreement. Id. As a consequence of
2 this, any Application or Deficiency Response received after November 20, 2017 is untimely and
3 will not be reviewed;

4
5 2. Based upon those determinations and pursuant to the terms of the Stipulation of
6 Settlement (ECF 125 at Sec. 6.3.7) “within three (3) business days after the Order and Judgment
7 (approving the settlement) becomes Final, the Pension Fund shall deposit into the Settlement
8 Fund” an additional \$9,725,006.20 (which represents a **total amount of settlement awards of**
9 **\$10,225,006.20** minus the \$500,000 advance payment that the Pension Fund made on April 20,
10 2017 pursuant to Section 6.3.5 of the Settlement Agreement). This Amount is confirmed by the
11 Pension Fund and separately by the Settlement Administrator. Exhibit I, Affidavit of the
12 Settlement Administrator. Because the settlement provides an administrative appeals process to
13 class members who had their timely applications denied, additional funding may occur, subject
14 to the terms of the Stipulation of Settlement, if any pending appeals are resolved in favor of the
15 class members. If such additional funding occurs, the parties shall so inform the Court; and
16

17 3. In exchange for these concessions to the Class, Plaintiff Class Counsel has agreed not
18 to seek additional lodestar fees related to the drafting and filing of their pending motion (ECF
19 166) and its supporting documentation, or for this stipulation.
20

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.
22
23

24 Dated: November 30, 2017


25 THE HONORABLE JON S. TIGAR
26
27
28

1 Hereby Stipulated,

2 Dated: November 28, 2017

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5 LAW OFFICE OF GEOFFREY V. WHITE
6 SINCLAIR LAW FIRM LLC

7 By:

/s/ Thomas O. Sinclair

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15 Dated: November 28, 2017

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