

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION**

Benjamin Reetz, individually and as the
representative of a class of similarly situated
persons, and on behalf of the Lowe's 401(k) Plan,

Plaintiff,

v.

Lowe's Companies, Inc., Administrative
Committee of Lowe's Companies, Inc., and Aon
Hewitt Investment Consulting, Inc.,

Defendants.

Case No. 5:18-cv-00075-KDB-DCK

**PLAINTIFF'S MOTION FOR
APPROVAL OF ATTORNEYS'
FEES AND COSTS,
ADMINISTRATIVE EXPENSES,
AND CLASS REPRESENTATIVE
SERVICE AWARD**

PLEASE TAKE NOTICE THAT Plaintiff Benjamin Reetz ("Plaintiff"), will and hereby does move this Court for an Order approving the following distributions from the settlement fund in connection with the Settlement Agreement with the Lowe's Defendants: (1) attorneys' fees in the amount of \$4,166,666.67 (one-third of the Gross Settlement Amount) to Class Counsel; (2) reimbursement of \$613,105.46 in expenses that Class Counsel incurred in connection with this action; (3) settlement administration expenses in the amount of \$203,045; and (4) a service award in the amount of \$10,000 to the Plaintiff as the class representative.

This motion is scheduled to be heard at the time of the Fairness Hearing on August 26, 2021 at 1:30 p.m. in Courtroom #4B, United States District Court, 401 W. Trade Street, Charlotte, NC 28202. This motion is made pursuant to Federal Rule of Civil Procedure 23(h) and Article 7 of the Settling Parties' Class Action Settlement Agreement (ECF No. 221-3), and is based on the accompanying Memorandum of Law and authorities cited therein; the Declarations of Kai Richter, and F. Hill Allen and exhibits thereto; the declaration previously submitted by the class representative (ECF No. 221-07); the Settling Parties' Class Action Settlement Agreement; the

Court's Preliminary Approval Order (ECF No. 234); and all files, records and proceedings in this matter. The Lowe's Defendants do not oppose this motion.

Respectfully Submitted,

Dated: July 13, 2021

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