

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

MIKE SHAFER, DAVID KEATING, and  
WILLIAM JEFFREY IGOE, Individually  
and On Behalf of All Others Similarly  
Situated,

Plaintiffs,

v.

GLOBAL PAYMENTS INC., ACTIVE  
NETWORK LLC, JEFF SLOAN,  
CAMERON BREADY, PAUL TODD,  
JOSH WHIPPLE, and ANDREA FACINI,

Defendants.

Case No. 1:23-CV-00577-LMM

CLASS ACTION

**CO-LEAD COUNSEL'S MOTION FOR  
ATTORNEYS' FEES AND LITIGATION EXPENSES**

Co-Lead Counsel Pomerantz LLP and Lowey Dannenberg P.C. respectfully submit this Motion for Attorneys' Fees and Litigation Expenses (the "Motion").<sup>1</sup>

Pursuant to Federal Rules of Civil Procedure 23(e) and 23(h), and the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(4), Co-Lead Counsel will and hereby does move the Court, before the Honorable Leigh Martin May, on December 11, 2024, at 10:00 a.m. in Courtroom 2107 of the Richard B. Russell Federal Building and United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, GA 30303-3309, or remotely per details that will be made publicly available on the Settlement website, or at such other location and time as set by the Court, for entry of an order (i) awarding attorneys' fees in the amount of 33.3% of the Settlement Fund, or \$1,200,000, plus interest, (2) reimbursement of \$53,474.16 for Litigation Expenses paid or incurred by Plaintiffs' Counsel, and (3) reimbursement of \$37,500, total, for costs and expenses of Co-Lead Plaintiffs Mike Shafer, David Keating and William Jeffrey Igoe directly related to their representation of the Settlement Class, as authorized by the Private Securities Litigation Reform Act of 1995.

This motion is based upon the Brief in Support of Co-Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses and the supporting Declaration of

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<sup>1</sup> All capitalized terms not otherwise defined shall have the meanings given to them in the Stipulation and Agreement of Settlement, dated June 10, 2024 (the "Stipulation"; ECF No. 65-2).

Jonathan D. Park, both filed concurrently herewith, all records and papers on file in this action, and any argument offered at a hearing on this motion.

A proposed Order granting the requested relief will be submitted with Co-Lead Counsel's reply papers to be filed on or before December 4, 2024, after the November 20, 2024 deadline for Settlement Class Members to object to the Settlement or request exclusion from the Settlement Class has passed.

Respectfully submitted this sixth day of November, 2024.

**POMERANTZ LLP**

*s/ Jonathan D. Park*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 6, 2024, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system, and a copy of the foregoing pleading has been electronically mailed to all attorneys of record.

/s/ Jonathan D. Park  
JONATHAN D. PARK