

**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,

Plaintiff,

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 PLAINTIFFS' RENEWED MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT AND
APPROVAL OF NOTICE TO THE SETTLEMENT CLASS**

Co-Lead Plaintiffs Mike Shafer, David Keating and William Jeffrey Igoe (“Co-Lead Plaintiffs”), on behalf of themselves and the other members of the Settlement Class, respectfully submit this Renewed Motion for Preliminary Approval of Settlement and Approval of Notice to the Settlement Class (the “Motion”).¹

Co-Lead Plaintiffs will and hereby do move the Court for an order: (i) certifying the Settlement Class for settlement purposes only, appointing Co-Lead Plaintiffs as class representatives, and appointing Pomerantz LLP and Lowey Dannenberg, P.C., as class counsel; (ii) preliminarily approving the proposed Settlement of this class action; (iii) approving the parties’ proposed form and method of notifying the Settlement Class of the action and the proposed Settlement and directing that such notice be disseminated to the Settlement Class; (iv) setting deadlines for Settlement Class members to exercise their rights in connection with the proposed Settlement; and (v) setting a hearing to consider whether the Court should grant final approval of the Settlement, dismiss claims against Defendants, approve the release of claims against all released parties, enter judgment, and award attorneys’ fees and expenses to Co-Lead Counsel and awards to Co-Lead Plaintiffs.

¹ 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”), which is submitted herewith.

This motion is based upon the Brief in Support of Co-Lead Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and Approval of Notice to the Settlement Class and the supporting Declaration of 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 form of order granting this Motion is filed concurrently herewith.

Respectfully submitted this 2nd day of August, 2024.

POMERANTZ LLP

s/ Jonathan D. Park

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 2, 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