

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

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 PLAINTIFFS' UNOPPOSED MOTION
FOR DISTRIBUTION OF THE NET SETTLEMENT FUND**

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, hereby move this Court for approval of their distribution plan pursuant to Federal Rule of Civil Procedure 23(e) and this Court’s Order Approving Plan of Allocation of Net Settlement Fund entered December 13, 2024 (ECF No. 74). In further support of this motion, Co-Lead Plaintiffs submit (i) the accompanying Brief in Support of Co-Lead Plaintiffs’ Unopposed Motion for Distribution of the Net Settlement Fund; (ii) the accompanying Declaration of

Kathleen Brauns in Support of Co-Lead Plaintiffs’ Unopposed Motion for Distribution of the Net Settlement Fund (the “Brauns Declaration”), with exhibits, submitted on behalf of the Court-approved Claims Administrator, A.B. Data, Ltd. (“A.B. Data”); and (iii) all other papers and proceedings herein, for entry of the accompanying [Proposed] Order Approving Distribution of the Net Settlement Fund (the “Class Distribution Order”).

Among other things, the Class Distribution Order would: (i) approve the administrative determinations of A.B. Data, accepting and rejecting Claims submitted in connection with the Settlement reached in the above-captioned Action as stated in the Brauns Declaration; (ii) direct the distribution of the Net Settlement Fund to Claimants whose Claims are accepted by A.B. Data as valid and approved by the Court (“Authorized Claimants”); (iii) direct that distribution checks state that the check must be cashed within 120 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 A.B. Data’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 Claim Forms and supporting documents at an

appropriate time. Pursuant to the Stipulation and Agreement of Settlement (ECF No. 96-2), this Motion is unopposed by Defendants.

There are no disputed Claims by any Settlement Class Member requiring Court review. As such, the Motion is ripe for determination. As this matter is fully briefed before the Court, a hearing on this motion is not required. Co-Lead Counsel respectfully requests that this motion be decided on the papers.

Respectfully submitted this 1st day of April, 2026.

POMERANTZ LLP

s/ Jonathan D. Park

Jeremy A. Lieberman
(Admitted *Pro Hac Vice*)
Jonathan D. Park
(Admitted *Pro Hac Vice*)
600 Third Avenue, 20th Floor
New York, NY 10016
Telephone: (212) 661-1100
Facsimile: (212) 661-8665
jalieberman@pomlaw.com
jpark@pomlaw.com

*Counsel to Co-Lead Plaintiff William
Jeffrey Igoe and Co-Lead Counsel for
the Class*

EVANGELISTA WORLEY, LLC

James M. Evangelista
500 Sugar Mill Road, Suite 245A
Atlanta, GA 30350
Telephone: (404) 205-8400
jim@ewlawllc.com

Counsel to Co-Lead Plaintiff William Jeffrey Igoe and Liaison Counsel for the Class

LOWEY DANNENBERG, P.C.

Vincent Briganti

vbriganti@lowey.com

(Admitted *Pro Hac Vice*)

Andrea Farah

afarah@lowey.com

(Admitted *Pro Hac Vice*)

Alessandra Greco

agreco@lowey.com

(Admitted *Pro Hac Vice*)

44 South Broadway, Suite 1100

White Plains, New York 10601

Telephone: 914/997-0500

Counsel to Co-Lead Plaintiffs Mike Shafer and David Keating and Co-Lead Counsel for the Class

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 1, 2026, I electronically filed the foregoing document with the Clerk of Court 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