

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

**IN RE EQUIFAX INC. SECURITIES
LITIGATION**

Consolidated Case No.
1:17-cv-03463-TWT

**LEAD PLAINTIFF’S UNOPPOSED MOTION FOR
APPROVAL OF DISTRIBUTION PLAN**

Lead Plaintiff Union Asset Management Holding AG, by and through its attorneys, hereby moves this Court for approval of its distribution plan pursuant to Rule 23(e) of the Federal Rules of Civil Procedure and this Court’s Order Approving Plan of Allocation of Net Settlement Fund (ECF No. 181) and Judgment Approving Class Action Settlement (ECF No. 182), for entry of the accompanying [Proposed] Order Approving Distribution Plan (the “Class Distribution Order”). In further support of this motion, Lead Plaintiff submits (i) the Declaration of Luiggy Segura in Support of Lead Plaintiff’s Unopposed Motion for Approval of Distribution Plan (the “Segura Declaration”)¹ submitted on behalf of the Court-approved Claims

¹ All terms with initial capitalization not otherwise defined herein shall have the meanings ascribed to them in the Segura Declaration or the Stipulation and

Administrator, JND Legal Administration (“JND”); (ii) the Memorandum in Support of Lead Plaintiff’s Unopposed Motion for Approval of Distribution Plan; and (iii) all other papers and proceedings herein, for entry of the accompanying [Proposed] Order Approving Distribution Plan (the “Class Distribution Order”).

Among other things, the Class Distribution Order would: (i) approve the administrative determinations of JND accepting and rejecting Claims submitted in connection with the Settlement reached in the above-captioned Action as stated in the Segura Declaration; (ii) direct the distribution of the Net Settlement Fund to Claimants whose Claims are accepted by JND as valid and approved by the Court (“Authorized Claimants”), while maintaining a Reserve for any tax liability or claims administration-related contingencies that may arise; (iii) direct that distribution checks state that the check must be cashed within 90 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 JND’s fees and expenses incurred and estimated to be incurred in the administration of the Settlement; (vii) release claims related to the administration

Agreement of Settlement dated February 12, 2020 (ECF No. 159-2) (the “Stipulation”).

process; and (viii) authorize the destruction of Claim Forms and supporting documents at an appropriate time. Pursuant to the terms of the Stipulation, this Motion is unopposed by Defendants.

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

Dated: February 24, 2021

Respectfully submitted,

/s/ James A. Harrod

James A. Harrod

(admitted *pro hac vice*)

Abe Alexander

(admitted *pro hac vice*)

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

1251 Avenue of the Americas

New York, New York 10020

Telephone: (212) 554-1400

Facsimile: (212) 554-1444

jim.harrod@blbglaw.com

abe.alexander@blbglaw.com

Counsel for Lead Plaintiff

Union Asset Management Holding AG

and Lead Counsel for the Class

H. Lamar Mixson
Georgia Bar No. 514012
Amanda Kay Seals
Georgia Bar No. 502720
**BONDURANT MIXSON &
ELMORE LLP**
1201 West Peachtree Street NW
Suite 3900
Atlanta, Georgia 30309
Telephone: (404) 881-4100
Facsimile: (404) 881-4111
mixson@bmelaw.com
seals@bmelaw.com

*Local Counsel for Lead Plaintiff
Union Asset Management Holding AG*

RULE 7.1(D) CERTIFICATE

The undersigned counsel certifies that this document has been prepared with 14-point Times New Roman, one of the font and point selections approved by the Court in Local Rule 5.1(C).

/s/ James A. Harrod
James A. Harrod

RULE 7.1(D) CERTIFICATE

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2021, I caused a true and correct copy of the foregoing to be filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing and make available the same to all attorneys or record.

/s/ James A. Harrod
James A. Harrod

CERTIFICATE OF SERVICE