

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

IN RE: CENTURLINK SALES  
PRACTICES AND SECURITIES  
LITIGATION

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:  
Civil File No. 18-296 (MJD/KMM)

**PLAINTIFFS' UNOPPOSED MOTION FOR  
APPROVAL OF DISTRIBUTION PLAN**

Lead Plaintiff and Class Representative the State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund (“Oregon”), and named plaintiff and Class Representative Fernando Alberto Vildosola, as trustee for the AUFV Trust U/A/D 02/19/2009 (“Vildosola,” and together with Lead Plaintiff, “Plaintiffs”), by and through their attorneys, hereby move this Court for approval of its distribution plan pursuant to Rule 23(e) of the Federal Rules of Civil Procedure and this Court’s Memorandum of Law & Order (ECF No. 380) and Judgment Approving Class Action Settlement (ECF No. 381) for entry of the accompanying [Proposed] Order Approving Distribution Plan (“Class Distribution Order”).<sup>1</sup> In further support of this motion, Plaintiffs submit (i) the Declaration of Owen F. Sullivan in Support of Plaintiffs’ Unopposed Motion for Approval of

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<sup>1</sup> All terms with initial capitalization not otherwise defined herein shall have the meanings ascribed to them in the Sullivan Declaration or the Stipulation and Agreement of Settlement dated January 29, 2021 (ECF No. 354-1) (“Stipulation”).

Distribution Plan (“Sullivan Declaration”) submitted on behalf of the Court-approved Claims Administrator, Epiq Class Action and Claims Solutions, Inc. (“Epiq”); (ii) the Memorandum of Law in Support of Plaintiffs’ Unopposed Motion for Approval of Distribution Plan; and (iii) all other papers and proceedings herein.

Among other things, the Class Distribution Order would: (i) approve the administrative determinations of Epiq accepting and rejecting Claims submitted in connection with the Settlement reached in the above-captioned Action; (ii) direct the distribution of the Net Settlement Fund to Claimants whose Claims are accepted by Epiq 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 Epiq’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 terms of the Stipulation, this Motion is unopposed by Defendants. There are no disputed Claims by any 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 request that this motion be decided on the papers.

Dated: May 20, 2022

Respectfully submitted,

/s/ Michael D. Blatchley

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