

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

CRAIG PARMER and MARK A.	)	
LAURANCE individually and on behalf	)	Case No. 0:20-cv-01253-DSD-HB
of all others similarly situated,	)	
	)	
	)	14,109.76
Plaintiffs,	)	
	)	
v.	)	
	)	
LAND O’LAKES, INC., THE BOARD	)	
OF DIRECTORS OF LAND O’LAKES,	)	
INC., LAND O’LAKES, INC.	)	
RETIREMENT PLAN COMMITTEE,	)	
and JOHN DOES 1-30.	)	
Defendants.	)	

**PLAINTIFFS CRAIG PARMER AND MARK A. LAURANCE’S MOTION FOR  
AN AWARD OF ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES  
AND CASE CONTRIBUTION AWARDS  
FOR THE NAMED PLAINTIFFS**

Plaintiffs Craig Parmer and Mark A. Laurance (together, “Plaintiffs”), participants in the Land O’Lakes Employee Savings & Supplemental Retirement Plan (the “Plan”), respectfully move this Court, pursuant to FED. R. CIV. P. 23, for an Order:

1. Granting class counsel attorneys’ fees in the amount of \$599,940.00 which represents 33 1/3% of the settlement amount;
2. Directing reimbursement to Class Counsel in the amount of \$14,109.76 of expenses incurred in the prosecution of the action;
3. Awarding case contribution awards of \$10,000.00 to each of the two Named Plaintiffs (Craig Parmer and Mark A. Laurance); and
4. For such other relief as the Court may deem just and proper.

A proposed form of Order is submitted hereto.

The grounds for this Motion are set forth in the following documents filed contemporaneously herewith:

A. Memorandum of Law in Support of Plaintiffs' Motion For Award of Attorneys' Fees and Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs;

B. Declaration of Mark K. Gyandoh in Support of Plaintiffs' Motion for Final Approval of Settlement and In Support of Plaintiffs' Motion for An Award of Attorneys' Fees, Reimbursement of Expenses and Case Contribution Awards for the Named Plaintiffs;

C. Declaration of Named Plaintiff Craig Parmer in Support of Plaintiffs' Motion for Final Approval of Settlement and In Support of Motion for An Award of Attorneys' Fees, Reimbursement of Expenses and Case Contribution Awards for the Named Plaintiffs;

D. Declaration of Named Plaintiff Mark A. Laurance In Support of Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs; and

A Proposed Order is submitted herewith.

Dated: October 10, 2022

Respectfully submitted,

**CAPOZZI ADLER, P.C.**

/s/ Mark K. Gyandoh

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 10, 2022, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

By: Mark K. Gyandoh  
Mark K. Gyandoh, Esq.

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RETIREMENT PLAN COMMITTEE,	)	
and JOHN DOES 1-30.	)	
Defendants.	)	

**[PROPOSED] ORDER AWARDING PLAINTIFFS’ COUNSEL ATTORNEYS’ FEES  
AND REIMBURSEMENT OF EXPENSES AND  
PLAINTIFFS’ CASE CONTRIBUTION AWARDS**

This matter having come before the Court on \_\_\_\_\_, on the application of Class Counsel for an award of attorneys’ fees and reimbursement of expenses incurred in the Action and for Case Contribution Awards for the Named Plaintiffs, having considered all papers filed and proceedings conducted herein, having found the settlement for this Action to be fair, reasonable and adequate and otherwise being fully informed in the premises and good cause appearing therefore:

**IT IS HEREBY ORDERED AND ADJUDGED:**

1. All of the capitalized terms used herein shall have the same meanings as set forth in the Settlement Agreement and Release (“Settlement Agreement”) dated February 28, 2022, and filed with the Court.

2. This Court has jurisdiction over the subject matter of this application and all matters relating thereto, including all members of the Settlement Class.

3. Class Counsel are hereby awarded attorneys' fees of \$\_\_\_\_\_ and reimbursement of expenses in the sum of \$\_\_\_\_\_ (the "Attorneys' Fees and Expenses"), to be paid from the Settlement Fund. The Court finds that the amount of fees awarded is appropriate and that the amount of fees awarded are fair and reasonable given the substantial risks of non-recovery, the time and effort involved, and the result obtained for the Settlement Class.

4. Each of the two Named Plaintiffs is awarded \$\_\_\_\_\_ each as a Case Contribution Award, as defined in the Settlement Agreement, in recognition of their contributions to this Action.

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2022.

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Hon. David S. Doty  
United States District Judge