

**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,	)	
	)	
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.	)	

**[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