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U.S. DISTRICT COURT
N.D. OF ALABAMA

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
MIDDLE DIVISION

CHERYL HAYNES, and MARCELLUS GARNER, individually, on behalf of the AlaTrade Foods Holdings, Inc. Employee Stock Ownership Plan, and on behalf of a class of all other persons similarly situated, **Plaintiffs,** **v.** **STEPHEN C. JAMES, as trustee of the AlaTrade Foods Holdings, Inc. Employee Stock Ownership Trust, ALATRADE FOODS HOLDINGS, INC., ALATRADE FOODS, INC., DAVIS LEE, BETH LEE, and BETH LEE as trustee of the Davis Lee 2017 Irrevocable Trustee Family Trust,** **Defendants.**	**Case No. 5:26-cv-00664-HDM** **Class Action**

PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, LITIGATION EXPENSE AND COST REIMBURSEMENT, AND SETTLEMENT ADMINISTRATION EXPENSES

Pursuant to Federal Rules of Civil Procedure 23(h) and 54(d)(2), Plaintiffs respectfully request that the Court enter an order granting an award of attorneys' fees, litigation expenses and cost reimbursement, and settlement administration expenses. The reasons supporting this motion are contained in Plaintiffs' supporting

memorandum of law filed contemporaneously herewith. Plaintiffs submit the following in support of this Motion:

1. Plaintiffs' Memorandum in Support of Motion for Attorneys' Fees, Litigation Expense and Cost Reimbursement, and Settlement Administration Expenses;
2. Declaration of Gregory Y. Porter (submitted with Plaintiffs' Unopposed Motion for Final Approval of Settlement and Certification of Settlement Class);
3. Declaration of Jessie Montague on behalf of RG/2 Claims Administration, LLC (submitted with Plaintiffs' Unopposed Motion for Final Approval of Settlement and Certification of Settlement Class) and;
4. Proposed Order granting final approval (submitted with plaintiffs' Unopposed Motion for Final Approval of Settlement and Certification of Settlement Class).

DATED: September 11, 2026

Respectfully submitted

/s/ David L. Selby

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of September, 2026, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. Accordingly, the foregoing is available for viewing and downloading from the ECF System.

/s/ David L. Selby
David L. Selby