

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

**SHARI AHRENSEN,
BARRY CLEMENT, LISA BUSH, and
THOMAS KALLAS, on behalf of the World
Travel, Inc. Employee Stock Ownership
Plan, and on behalf of a class of all other
persons similarly situated,**

Plaintiffs,

v.

**PRUDENT FIDUCIARY SERVICES, LLC,
et. al.,**

Defendants.

Case No. 2:21-CV-02157-HB

UNOPPOSED REQUEST TO CORRECT RECORD NUNC PRO TUNC

Plaintiffs Shari Ahrendsen, Barry Clement, Lisa Bush, and Thomas Kallas, individually and as Class Representatives (“Plaintiffs” or “Class Representatives”) request the Court correct the record nunc pro tunc for the reasons explained below. On April 28, 2023, Plaintiffs submitted a Motion for Final Approval of Settlement and Certification of Settlement Class (“Final Approval Motion”) set forth in the Class Action Settlement Agreement dated January 25, 2023 (the “Settlement Agreement”). Plaintiffs’ Counsel also submitted to the Court their Motion for Attorneys’ Fees and Expense Reimbursement, Settlement Administration Fees, and Service Awards (“Plaintiffs’ Counsel Fees and Costs Motion”).

The Final Approval Motion sought final approval of, among other things, the proposed Plan of Allocation (“POA”). (Dkt. 85-1) The POA contains a scrivener’s error. Specifically, Paragraph 5 speaks to the reallocation of monies attributable to those participants who were to receive less than \$10 on a “per capita” basis. Paragraph 5 should say on a “pro rata basis” as it was

intended to be consistent with Paragraph 3. Plaintiffs will submit a corrected POA with a proposed Final Order that incorporates adoption of the corrected POA and consistent with the Court's rulings at the Fairness Hearing.

Plaintiffs' Counsel Fees and Costs Motion sought reimbursement of \$67,649.70 in expenses, of which (Dkt. 93 at 1), of which \$7,377.05 represents legal research tools such as Westlaw and the like. Mr. Porter's supporting declaration understated that expense item by \$40, so there is a \$40 difference between the amount stated in the motion requesting expenses and the declaration, with the amount sought in the motion being correct.

Plaintiffs submit that these minor corrections have no material impact on the fairness of the settlement or due notice to the class.

The motion is unopposed.

Dated: May 12, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of May, 2023, a copy of the foregoing document was served on all counsel of record via email.

/s/ Gregory Y. Porter
Gregory Porter