

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

BEAVER COUNTY EMPLOYEES’)	Civ. No. 0:14-cv-00786-ADM-TNL
RETIREMENT FUND; ERIE COUNTY)	
EMPLOYEES’ RETIREMENT SYSTEM;)	<u>CLASS ACTION</u>
and LUC DE WULF, Individually and on)	
Behalf of All Others Similarly Situated,)	CLASS REPRESENTATIVES’ MOTION
)	FOR FINAL APPROVAL OF CLASS
Plaintiffs,)	ACTION SETTLEMENT AND PLAN OF
)	DISTRIBUTION
vs.)	
)	DATE: May 3, 2017
TILE SHOP HOLDINGS, INC.; ROBERT)	TIME: 10:00 a.m.
A. RUCKER; THE TILE SHOP, INC.;)	CTRM: The Honorable Ann D.
TIMOTHY C. CLAYTON; PETER J.)	Montgomery
JACULLO, III; JWTS, INC.; PETER H.)	
KAMIN; TODD KRASNOW; ADAM L.)	
SUTTIN; WILLIAM E. WATTS;)	
ROBERT W. BAIRD & CO.)	
INCORPORATED; CITIGROUP)	
GLOBAL MARKETS, INC.; CJS)	
SECURITIES, INC.; HOULIHAN LOKEY)	
CAPITAL, INC.; PIPER JAFFRAY)	
& CO.; SIDOTI & COMPANY, LLC;)	
TELSEY ADVISORY GROUP LLC; and)	
WEDBUSH SECURITIES, INC.,)	
)	
Defendants.)	

Class Representatives Beaver County Employees' Retirement Fund, Erie County Employees' Retirement System and Luc DeWulf hereby move this Court for final approval of class action settlement and approval of plan of distribution of settlement proceeds. This Motion is based upon the Notice of Hearing, this Motion, the Memorandum of Law in Support thereof, the Joint Declaration of Matthew L. Mustokoff and Joseph Russello in Support of (I) Class Representatives' Motion for Final Approval of Class Action Settlement and Plan of Distribution; and (II) Class Counsel's Motion for Attorneys' Fees and Expenses and Reimbursement of Class Representatives' Costs and Expenses, the Declaration of Carole K. Sylvester Regarding (A) Mailing of the Notice and Proof of Claim, (B) Publication of the Summary Notice, and (C) Requests for Exclusion Received to Date, the pleadings and records on file in this case, and such other matters and arguments as the Court may consider.

DATE: March 20, 2017

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP

SAMUEL H. RUDMAN (admitted *pro hac vice*)

JOSEPH RUSSELLO (admitted *pro hac vice*)

FRANCIS P. KARAM (admitted *pro hac vice*)

WILLIAM J. GEDDISH (admitted *pro hac vice*)

CHRISTOPHER T. GILROY (admitted *pro hac vice*)

s/ Joseph Russello

JOSEPH RUSSELLO

58 South Service Road, Suite 200

Melville, NY 11747

Telephone: 631/367-7100

631/367-1173 (fax)

srudman@rgrdlaw.com

jrussello@rgrdlaw.com

fkaram@rgrdlaw.com

- 1 -

wgeddish@rgrdlaw.com
cgilroy@rgrdlaw.com

and

JEFFREY D. LIGHT (*pro hac vice*)
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)
jeffl@rgrdlaw.com

KESSLER TOPAZ MELTZER
& CHECK, LLP

MATTHEW L. MUSTOKOFF (*admitted pro hac vice*)
KIMBERLY A. JUSTICE (*admitted pro hac vice*)
MICHELLE M. NEWCOMER (*admitted pro hac vice*)
NATHAN A. HASIUK (*admitted pro hac vice*)

s/ Matthew L. Mustokoff

MATTHEW L. MUSTOKOFF

280 King of Prussia Road
Radnor, PA 19087
Telephone: 610/667-7706
610/667-7056 (fax)
mmustokoff@ktmc.com
kjustice@ktmc.com
mnewcomer@ktmc.com
nhasiuk@ktmc.com

and

STACEY M. KAPLAN (*admitted pro hac vice*)
PAUL A. BREUCOP (*admitted pro hac vice*)
One Sansome Street, Suite 1850
San Francisco, CA 94104
Telephone: 415/400-3000
415/400-3001 (fax)
skaplan@ktmc.com
pbreucop@ktmc.com

Co-Lead Counsel for Plaintiffs and the Class

CHESTNUT CAMBRONNE PA
KARL L. CAMBRONNE (#14321)
JEFFREY D. BORES (#227699)
BRYAN L. BLEICHNER (#0326689)
17 Washington Avenue North, Suite 300
Minneapolis, MN 55401-2048
Telephone: 612/339-7300
612/336-2940 (fax)
kcambronne@chestnutcambronne.com
jbores@chestnutcambronne.com
bbleichner@chestnutcambronne.com

Liaison Counsel for Plaintiffs

Motions

[0:14-cv-00786-ADM-TNL Beaver County Employees' Retirement Fund et al v. Tile Shop Holdings, Inc. et al](#)

CV,PROTO

U.S. District Court

U.S. District of Minnesota

Notice of Electronic Filing

The following transaction was entered by Russello, Joseph on 3/20/2017 at 4:31 PM CDT and filed on 3/20/2017

Case Name: Beaver County Employees' Retirement Fund et al v. Tile Shop Holdings, Inc. et al

Case Number: [0:14-cv-00786-ADM-TNL](#)

Filer: Beaver County Employees' Retirement Fund
Erie County Employees Retirement System
Luc De Wulf

Document Number: [386](#)

Docket Text:

[MOTION for Approval of Settlement - Class Representatives' Motion for Final Approval of Class Action Settlement and Plan of Distribution filed by Beaver County Employees' Retirement Fund, Erie County Employees Retirement System, Luc De Wulf. \(Russello, Joseph\)](#)

0:14-cv-00786-ADM-TNL Notice has been electronically mailed to:

Aaron Knoll Aaron.Knoll@FaegreBD.com, cheryl.rowles@faegrebd.com

Bryan L Bleichner bbleichner@chestnutcambronne.com, dproulx@chestnutcambronne.com

Christopher T. Gilroy cgilroy@rgrdlaw.com

Daniel J Supalla dsupalla@briggs.com, dburrell@briggs.com

David P Pearson dpearson@winthrop.com, glaitinen@winthrop.com, vhandler@winthrop.com

Francis P. Karam fkaram@rgrdlaw.com

Frank A Taylor ftaylor@briggs.com

Jed M Schwartz jschwartz@milbank.com

Jeffrey D Bores jbores@chestnutcambronne.com, dproulx@chestnutcambronne.com

Jeffrey D. Light jeffl@rgrdlaw.com

Joseph F Russello jrussello@rgrdlaw.com, e_file_ny@rgrdlaw.com, e_file_sd@rgrdlaw.com

Justin P Krypel justin.krypel@faegrebd.com, susan.johnston@faegrebd.com

Karl L Cambronne kcambronne@chestnutcambronne.com

Kimberly A Justice kjustice@ktmc.com

Margaret E Onasch monasch@ktmc.com, mswift@ktmc.com

Mark Samuel Reich mreich@rgrdlaw.com
CMECF.widgit.ProcessingWindowDestroy() R>Matthew C Robinson mrobinson@winthrop.com, eprisby@winthrop.com

Matthew D. Callanan mcallanan@winthrop.com, rtri@winthrop.com

Matthew L Mustokoff mmustokoff@ktmc.com, dpotts@ktmc.com, jenck@ktmc.com

Michelle M. Newcomer mnewcomer@ktmc.com

Nathan A. Hasiuk nhasiuk@ktmc.com

Paul A. Breucop pbreucop@ktmc.com, jsim@ktmc.com

Samuel H Rudman srudman@rgrdlaw.com, e_file_ny@rgrdlaw.com, e_file_sd@rgrdlaw.com

Scott A Edelman sedelman@milbank.com

Stacey M. Kaplan skaplan@ktmc.com, pbreucop@ktmc.com, yjayasuriya@ktmc.com

Staci L. Perdue staci.perdue@faegreBD.com, jane.thompson@faegrebd.com

Wendy J Wildung wendy.wildung@FaegreBD.com, terrilyn.storlien@faegrebd.com

William John Geddish wgeddish@rgrdlaw.com

0:14-cv-00786-ADM-TNL Notice has been delivered by other means to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1051215216 [Date=3/20/2017] [FileNumber=5891898-0]
][5b046aa40f2df708ab6c869ce638a2528919195c8504124222026e75fe2c9a58b9f
1af255ffa4f9beefd8860d97dec4e3cf76c6f583511d8c082be99fc14abfa]]