

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ARTUR A. NISTRA,  
on behalf of The Bradford Hammacher  
Group, Inc. Employee Stock Ownership Plan,  
and on behalf of a class of all other persons  
similarly situated,

Plaintiff,

v.

RELIANCE TRUST COMPANY,

Defendant.

Case No. 1:16-cv-04773

Hon. Gary Feinerman

Magistrate Judge Sidney I. Schenkier

**PLAINTIFF'S UNOPPOSED MOTION FOR FINAL APPROVAL OF SETTLEMENT**

Pursuant to Federal Rule of Civil Procedure 23, Plaintiff Artur A. Nistra, Individually and as Class Representative, presents his unopposed motion for an order approving a class action settlement agreement between Plaintiff, Defendant Reliance Trust Company (“Reliance”) as well as third parties The Bradford Hammacher Group, Inc. (“Bradford Hammacher”) and all its predecessors, subsidiaries and affiliates, The Bradford Hammacher Group, Inc. Employee Stock Ownership Plan (the “Plan”), and Richard Tinberg, James Liggett and John MacArthur (collectively “Selling Shareholders/Directors”). The bases supporting this unopposed motion are set forth in the accompanying brief. A Final Judgment and Order Approving Class Settlement and Dismissal With Prejudice is attached as Exhibit C to the Memorandum in Support of this Motion.

The Parties also request that, if the Standing Order in re: Court Operations Under the Exigent Circumstances Created by COVID-19 is amended such that it would impact the Final Fairness Hearing, that the Final Fairness Hearing be allowed to proceed telephonically on June

19, 2020, as currently scheduled.

Dated: May 18, 2020

Respectfully Submitted,

/s/ Patrick O. Muench

Patrick O. Muench (IL #6290298)

**BAILEY & GLASSER LLP**

333 S. Wabash Ave., Ste. 2736

Chicago, IL 60604

pmuench@baileyglasser.com

Gregory Y. Porter (*pro hac vice*)

Ryan T. Jenny

**BAILEY & GLASSER LLP**

1055 Thomas Jefferson St. NW Ste. 540

Washington, DC 20007

(202) 463-2101

gporter@baileyglasser.com

rjenny@baileyglasser.com

Robert A. IZARD (*pro hac vice*)

Douglas P. Needham (*pro hac vice*)

**IZARD, KINDALL & RAABE, LLP**

29 South Main Street, Suite 305

West Hartford, CT 06107

Telephone: (860) 493-6292

Facsimile: (860) 493-6290

rizard@ikrlaw.com

dneedham@ikrlaw.com

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that, on May 18, 2020, I caused a true and correct copy of the foregoing to be filed electronically using the Court's CM/ECF system and to be thereby served upon all registered participants identified in the Notice of Electronic Filing in this matter on this date.

/s/ Patrick O. Muench  
Patrick O. Muench