

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

DENIS J. CONLON, NICOLE TRAVIS, BRIAN  
J. SCHROEDER, PATRICK A. JACEK, PETER  
HANSELMANN, and ALEXANDER PASCALE,  
Individually, on Behalf of The Northern Trust  
Company Thrift-Incentive Plan, and on Behalf of  
All Others Similarly Situated,  
Plaintiffs,

v.

THE NORTHERN TRUST COMPANY;  
THE NORTHERN TRUST COMPANY  
EMPLOYEE BENEFIT ADMINISTRATIVE  
COMMITTEE; and KIMBERLY SOPPI;  
Defendants.

Case No. 1:21-cv-2940

Magistrate Judge Keri Holleb  
Hotaling

**JOINT MOTION TO AMEND SETTLEMENT SCHEDULE**

Defendants The Northern Trust Company, The Northern Trust Company Employee Benefit Administrative Committee, and Kimberly Soppi (collectively, the “Defendants”) and plaintiffs Denis J. Conlon, Diane M. Mato, Brian J. Schroeder, Patrick A. Jacek, Peter Hanselmann, and Alexander Pascale (collectively, “Plaintiffs”), jointly move the Court to amend the Schedule for Class Action Settlement Approval (Dkt. 112) (hereinafter the “Schedule”).

In support of this motion, the parties state as follows:

1. On November 8, 2024, the parties submitted their Joint Proposed Schedule for Class Action Settlement Approval. (Dkt. 110). The Court largely adopted the Schedule as proposed by the parties, with minor changes. (See Dkts. 111, 112).

2. Under the parties' settlement agreement (Dkt. 110), because the Court entered its order preliminarily approving the settlement on January 28, 2025, the deadline for the settlement administrator to send settlement notices to class members is March 10, 2025. The deadlines in the Schedule were calculated based on that date.

3. Although the parties have been working diligently with the settlement administrator to meet the March 10, 2025 deadline, they encountered unforeseen delays in obtaining participant data necessary to send the settlement notices. The parties now expect the settlement administrator will have that data by about April 10, 2025, and the settlement administrator believes that notices can be sent by April 24, 2025.

4. Accordingly, the parties wish to amend the subsequent dates in the Schedule to those reflected in **Exhibit A** (the "Proposed Amended Settlement Schedule"). This includes an adjustment of the in-person Final Fairness Hearing from June 10, 2025 at 10:00 a.m. to July 25, 2025 at 10:00 a.m. (or another date/time convenient for the Court after July 25). A redline comparing the Proposed Amended Settlement Schedule to the Schedule previously adopted by this Court is attached hereto as **Exhibit B**.

5. The parties and the settlement administrator have discussed the Proposed Amended Settlement Schedule and agree that additional time is needed to ensure that all class members receive adequate Notice, and that the Proposed Amended Settlement Schedule is otherwise reasonable.

WHEREFORE, because good cause exists to amend the Schedule, the parties respectfully request that this Court enter an order adopting the Proposed Amended Settlement Schedule as set forth in Exhibit A.

Dated: March 10, 2025

/s/ Kristen M. Anderson

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 10, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system to send notification of such filing to all counsel of record.

/s/ Amanda S. Amert

Amanda S. Amert