

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
Newark Vicinage**

RAY ALLEN LUENSE, PAMELA  
PEARSON, DANIEL F. SETTNEK  
and NEIL ROSE, individually and as  
representatives of a class of  
participants and beneficiaries on behalf  
of the Konica Minolta 401(k) Plan,

Plaintiffs,

v.

KONICA MINOLTA BUSINESS  
SOLUTIONS U.S.A., INC., BOARD  
OF DIRECTORS OF KONICA  
MINOLTA BUSINESS SOLUTIONS  
U.S.A., INC., KONICA MINOLTA  
401(K) PLAN COMMITTEE,  
SANDRA SOHL, SUSAN  
MCCARTHY, and JOHN DOES 1-30,

Defendants.

Civil Action No.: 2:20-cv-06827 (EP-  
JSA)

**JOINT MOTION TO EXTEND  
DEADLINES FOR NOTICE AND  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

Plaintiffs Ray Allen Luense, Pamela Pearson, Neil Rose, and Daniel F. Settnek (“Plaintiffs”), on behalf of themselves, the Konica Minolta 401(k) Plan (the “Plan”), and the Konica Minolta 401(k) Plan Class<sup>1</sup> and Defendants Konica Minolta Business Solutions U.S.A., Inc. and the Konica Minolta 401(k) Plan Committee

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<sup>1</sup> The Class is defined as “All persons, except Defendants and their immediate family members, who were participants in or beneficiaries of the Konica Minolta 401(k) Plan, at any time between June 4, 2014 and the present (the “Class Period”)” (ECF No. 119).

(“Defendants”) respectfully move the Court for an Order extending the deadlines for notice and approval of the proposed Class Action Settlement:

WHEREAS, on December 13, 2024, Plaintiffs filed an unopposed motion seeking preliminary approval of the proposed Class Action Settlement (ECF No. 134);

WHEREAS, on December 23, 2024, the Court entered an order granting preliminary approval of the Settlement, approving the form and manner of notice to the Class, preliminarily approving the Plan of Allocation, and scheduling a fairness hearing (ECF No. 135);

WHEREAS, the preliminary approval order approved the appointment of Analytics LLC as the Settlement Administrator for the Settlement and directed the Settlement Administrator to mail the approved Settlement Notice and Former Participant Claim Form to the last known address of each member of the Settlement Class by January 24, 2025 (*Id.*);

WHEREAS, the preliminary approval order also set deadlines for briefs in support of final approval (March 31, 2025), objections to the Settlement (April 10, 2025), responses to objections (April 24, 2025), supplemental briefs in support of the Settlement, if any (April 30, 2025), and notices participate at the final approval hearing (May 1, 2025);

WHEREAS, the preliminary approval order scheduled an in-person final fairness hearing for May 15, 2025, at 11:00 a.m. in the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Courtroom 2B, Newark, NJ 07102 (*Id.*);

WHEREAS, the Plan's current recordkeeper experienced unexpected delays in providing the Settlement Administrator with the Class Member data needed to mail the approved Settlement Notice and Former Participant Claim Form to the Settlement Class by the January 24, 2025 deadline;

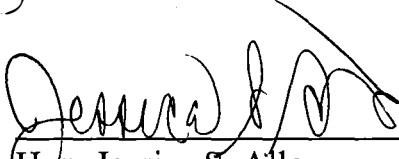
WHEREAS, the Plan's current recordkeeper provided the Class Member data to the Settlement Administrator on February 14, 2025;

THEREFORE, the parties jointly request that the foregoing deadlines be extended as follows:

Deadline to serve Settlement Notice	March 6, 2025
Deadline to send postcard to former participants who did not return claim	April 17, 2025
Deadline to file Petition for Attorneys' Fees, Litigation Costs, and Case Contribution Awards	April 25, 2025
Deadline to file Motion for Final Approval of Settlement	May 12, 2025
Objections to Settlement	May 22, 2025
Responses to Objections	June 5, 2025
Any additional briefs	June 9, 2025
Notice of intention to participate in Fairness Hearing	June 12, 2025
Fairness Hearing	June 23, 2025 at 11:00 a.m.

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**SO ORDERED** this 18<sup>th</sup> day of February, 2025

  
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Hon. Jessica S. Allen  
United States Magistrate Judge

Dated: February 17, 2025

Respectfully submitted,

/s/ William J. Delany

William J. Delany  
(NJ ID # 049031994)  
Lars C. Golumbic  
(admitted *pro hac vice*)  
Samuel I. Levin  
(admitted *pro hac vice*)  
**GROOM LAW GROUP,  
CHARTERED**  
1701 Pennsylvania Avenue, NW  
Washington, DC 20006-5811  
Telephone: (202) 857-0620  
E-Mail: wdelany@groom.com  
lgolumbic@groom.com  
slevin@groom.com

Philip W. Crawford  
(NJ ID # 023431980)  
**GIBBONS, P.C.**  
One Gateway Center  
Newark, NJ 07102-5310  
Telephone: (973) 596-4803  
E-Mail: pcrawford@gibbonslaw.com

*Counsel for Defendants  
Konica Minolta Business Solutions  
U.S.A., Inc. and the Konica Minolta  
401(k) Plan Committee*

/s/ Eric Lechtzin

Eric Lechtzin  
(NJ ID # 011841992)  
Marc H. Edelson  
(admitted *pro hac vice*)  
**EDELSON LECHTZIN LLP**  
411 S. State Street, Suite N-300  
Newtown, PA 18940  
Telephone: (215) 867-2399  
elechtzin@edelson-law.com  
medelson@edelson-law.com

Julie S. Selesnick  
(admitted *pro hac vice*)  
Natalie Lesser  
(admitted *pro hac vice*)  
**BERGER MONTAGUE PC**  
1818 Market Street, Suite 3600  
Philadelphia, PA 19103  
Telephone: (215) 875-3000  
jselesnick@bm.net  
nlesser@bm.net

*Class Counsel*