

**UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT**

<p>DENIS MARC AUDET, MICHAEL PFEIFFER, DEAN ALLEN SHINNERS, and JASON VARGAS, Individually and on Behalf of All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">vs.</p> <p>STUART A. FRASER, GAW MINERS, LLC, and ZENMINER, LLC (d/b/a ZEN CLOUD),</p> <p style="text-align: center;">Defendants.</p>	<p>Case 3:16-cv-00940</p> <p>Hon. Michael P. Shea Courtroom 2</p> <p>ECF Case</p> <p><u>CLASS ACTION</u></p> <p>September 5, 2024</p>
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**PLAINTIFFS' MOTION TO AUTHORIZE DISTRIBUTION OF  
NET SETTLEMENT FUNDS TO CLAIMANTS AND REIMBURSEMENT OF  
CLAIMS ADMINISTRATION AND CLASS COUNSEL EXPENSES**

Plaintiffs Denis Audet, Michael Pfeiffer, and Dean Allen Shinners (“Plaintiffs”) move, for the reasons set forth in the accompanying memorandum of law submitted in support of this motion, for an order:

1. Approving Epiq’s final determinations concerning the claims submitted;
2. Approving the proposed distribution of *pro rata* claims in the manner set forth in the accompanying memorandum of law, and reflected in the stake amounts in Paragraphs 35-36 and Exhibit K to the Kimball Declaration;
3. Reimbursing Epiq’s expenses incurred for claims and settlement administration;
4. Reimbursing Class Counsel’s unreimbursed expenses;
5. Prohibiting any additional claims to these Settlements;
6. Releasing claims against persons involved in the claims administration process for claims arising out of such involvement; and
7. Reiterating the Court’s continued jurisdiction over the administration of this Settlement.

Dated: September 5, 2024

Respectfully submitted,

/s/ Russell Rennie

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*Counsel for Plaintiffs*

CERTIFICATE OF SERVICE

I hereby certify that on September 5, 2024, a copy of the foregoing document was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Russell Rennie