

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

CRAIG PARMER and MARK A.)	
LAURANCE individually and on behalf)	Case No. 0:20-cv-01253-DSD-HB
of all others similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	
)	
LAND O'LAKES, INC., THE BOARD)	
OF DIRECTORS OF LAND O'LAKES,)	
INC., LAND O'LAKES, INC.)	
RETIREMENT PLAN COMMITTEE,)	
and JOHN DOES 1-30.)	
Defendants.)	

**DECLARATION OF MARK K. GYANDOH IN SUPPORT OF PLAINTIFFS’
SUPPLEMENTAL MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFFS’
MOTIONS FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT,
CERTIFICATION OF SETTLEMENT CLASS, AND APPROVAL OF PLAN OF
ALLOCATION AND FOR AN AWARD OF ATTORNEYS’ FEES AND
REIMBURSEMENT OF EXPENSES AND CASE CONTRIBUTION AWARDS
TO THE NAMED PLAINTIFFS**

I, Mark K. Gyandoh, Esquire, as Class Counsel, declare as follows:

1. I am a member in good standing of the bar of the Commonwealth of Pennsylvania and have personal knowledge of the facts set forth below and, if called as a witness, I could and would testify competently thereto.

2. As lead Plaintiffs’ attorney, I personally managed, delegated, and supervised the allocation of personnel and expenses employed by my firm in this case. We have aggressively, efficiently, and vigorously prosecuted this case and represented the best

interest of the Plaintiffs and the participants and beneficiaries of the Plan. Over the course of the litigation, we have incurred the following expenses:

Expense Category	Amount
PACER	\$170.00
Westlaw Research	\$250.27
Courier/Fed Ex	\$242.44
E-Discovery	\$1,839.19
Court Costs (filing fees)	\$400.00
Travel	\$44.36
Mediator	\$11,212.50
Total	\$14,158.76

3. The amount paid to the Mediator includes \$250 that was invoiced for payment on October 11, 2022. It was the balance due from Plaintiffs for work performed by the Mediator on September 23, 2022. My firm promptly sent payment.

4. Liaison counsel, Lockridge Grindal Nauen P.L.L.P. incurred unreimbursed expenses of \$201.00. *See* ECF 101-04 Ex. 4, ¶ 7, p. 4 of 16. Thus, the total amount of unreimbursed expenses for Plaintiffs' Counsel is **\$14,359.76**.

I declare, pursuant to 28 U.S.C. §1746 and under penalty of perjury, that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed this 2nd day of November, 2022, in Merion Station, Pennsylvania.

CAPOZZI ADLER, P.C.

/s/ Mark K. Gyandoh

Mark K. Gyandoh, Esquire

Class Counsel