



Enterprise Solutions, Inc. and the Novitex Enterprise Solutions Employee Benefits Committee (together, “Defendants”) do not oppose this Motion.

With this Motion, Plaintiff moves the Court to enter an Order that grants final approval of the proposed Settlement as fair, reasonable and adequate, sanctions an award of attorneys’ fees (inclusive of expenses) in the amount of 25% of the Settlement Fund to Class Counsel, and sanctions a Service Award of \$15,000 to the Class Representative, as described in the Settlement and accompanying Memorandum of Law. Plaintiff brings this Motion pursuant to Federal Rule of Civil Procedure 23(e), and it is supported by the accompanying Memorandum of Law; the Declaration of Laurie Rubinow; the Declarations of Cornelia Vieira and Josephine Bravata of Settlement Administrator Strategic Claims Services (“SCS”) and supporting exhibits; the Declaration of Rigoberto Sandoval; the pleadings, records, and papers on file in this action; and all other matter properly before this Court.

The parties have met all deadlines provided in the Preliminary Approval Order. Plaintiff stands ready to provide any additional information or materials that the Court may require in connection with its consideration of the Motion.

Dated: August 3, 2021

Respectfully submitted,

MILLER SHAH LLP

/s/ Laurie Rubinow

James E. Miller

Laurie Rubinow

65 Main Street

Chester, CT 06412

Telephone: (860) 526-1100

Facsimile: (866) 300-7367

Email: [jemiller@millershah.com](mailto:jemiller@millershah.com)

[lrubinow@millershah.com](mailto:lrubinow@millershah.com)

Nathan C. Zipperian  
MILLER SHAH LLP  
1625 N. Commerce Parkway, Suite 320  
Fort Lauderdale, FL 33326  
Telephone: (954) 515-0123  
Facsimile: (866) 300-7367  
Email: [nczipperian@millershah.com](mailto:nczipperian@millershah.com)

Ronald S. Kravitz  
Kolin C. Tang  
MILLER SHAH LLP  
201 Filbert Street, Suite 201  
San Francisco, CA 94111  
Telephone: (415) 429-5272  
Facsimile: (866) 300-7367  
Email: [rskravitz@millershah.com](mailto:rskravitz@millershah.com)  
[kctang@millershah.com](mailto:kctang@millershah.com)

James C. Shah  
Alec J. Berin  
MILLER SHAH LLP  
1845 Walnut Street, Suite 806  
Philadelphia, PA 19103  
Telephone: (610) 891-9880  
Facsimile: (866) 300-7367  
Email: [jcshah@millershah.com](mailto:jcshah@millershah.com)  
[ajberin@millershah.com](mailto:ajberin@millershah.com)

Sahag Majarian  
LAW OFFICES OF SAHAG MAJARIAN  
18250 Ventura Blvd.  
Tarzana, CA 91356  
Telephone: (818) 609-0807  
Facsimile: (818) 609-0892  
Email: [sahagii@aol.com](mailto:sahagii@aol.com)

***Attorneys for Plaintiff, the Class  
and the Exela 401(k) Plan***