



IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

BRET KUKARD, Derivatively on)
Behalf of the Symantec)
Corporation Employee Stock)
Purchase Plan,)
)
Plaintiff,)
)
v.)
SYMANTEC CORPORATION,)
FRANK E. DANGEARD,)
GERALDINE B. LAYBOURNE,)
DAVID L. MAHONEY,)
ROBERT S. MILLER,)
SUZANNE M. VAUTRINOT and)
V. PAUL UNRUH,)
)
Defendants.)
)

C.A. No. N18C-07-117-VLM-CCLD

**PLAINTIFF’S MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT**

Plaintiff Bret Kukard (“Plaintiff”) hereby moves under Del. Super. Ct. Civ. R. 23, before the Honorable Judge Vivian L. Medinilla, for: (i) final approval of the class action settlement (the “Settlement”); (ii) certification of the Settlement Class¹; (iii) finally appointing Plaintiff as Settlement Class Representative; and (iv) finally appointing the law firm of Gainey McKenna & Egleston as Class Counsel to act on behalf of the Settlement Class with respect to the Settlement, for the reasons set forth in Plaintiff’s Memorandum of Law filed contemporaneously herewith.

¹ Unless otherwise noted, all capitalized terms shall have the same definition as set forth in the Stipulation.

Dated: October 30, 2024

BIELLI & KLAUDER, LLC

OF COUNSEL

**GAINEY McKENNA &
EGLESTON**

Thomas J. McKenna (*pro hac vice*)
Gregory M. Egleston
Christopher M. Brain
260 Madison Avenue, 22nd Floor
New York, NY 10016
Telephone: (212) 983-1300
Facsimile: (212) 983-0383
tjmckenna@gme-law.com
gegleston@gme-law.com
cbrain@gme-law.com

/s/ Ryan M. Ernst

Ryan M. Ernst, Esquire (No. 4788)
1204 N. King Street
Wilmington, DE 19801
Main: (302) 803-4600
Direct: (302) 321-5411
rernst@bk-legal.com

Counsel for Plaintiff and the Class