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*Class Counsel Continued on Signature Page*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION

RONNIE DOOLEY, *et al.*, individually and  
on behalf of all others similarly situated

Plaintiffs,

v.

RONALD SAXTON, RODERICK C.  
WENDT, R. NEIL STUART, and JELD-  
WEN EMPLOYEE STOCK OWNERSHIP  
& RETIREMENT PLAN,

Defendants.

Case No. 1:12-CV-1207-MC  
Consolidated with Case Nos: 1:13-CV-177-  
MC & 1:13-CV-395-MC

PLAINTIFFS' UNOPPOSED MOTION  
FOR FINAL APPROVAL OF THE  
CLASS ACTION SETTLEMENT AND  
THE PLAN OF ALLOCATION

PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF  
THE CLASS ACTION SETTLEMENT AND THE PLAN OF ALLOCATION

Pursuant to Fed. R. Civ. P. 23(e), Plaintiffs' Counsel hereby moves for final approval of the class action settlement and the Plan of Allocation. Defendants do not oppose the motion. In support, Plaintiffs' Counsel states as follows:

1. Pursuant to Local Rule 7-1(a)(1), Matthew Hurst, the undersigned counsel certifies, under the penalties of perjury, that he conferred with counsel for Defendants on October 1, 2015, via telephone, about this motion. Defendants do not oppose the relief sought by this motion.

2. Plaintiffs' Counsel has settled, and the Court has preliminarily approved, the above captioned for \$15.5 million in cash and valuable non-monetary relief.

3. As explained in the memorandum filed with this motion, this Court should grant final approval of the settlement as it is fair, adequate, and reasonable. Notice has been provided to 11,035 Class Members, the U.S. Attorney General, and 53 state and territorial attorneys general. The settlement is supported by over 99.98% of the 11,035 Class Members, the relevant governmental authorities, the Named Plaintiffs, Class Counsel, and the Independent Fiduciary.

5. Class Counsel also requests that the Court approve the Plan of Allocation. The proposed Plan treats all Class Members fairly and equally.

For the foregoing reasons and the reasons contained in the contemporaneously filed memorandum in support of this motion, Class Counsel respectfully requests that this Court enter final approval of the settlement and the Plan of Allocation. A proposed Order is filed with this motion, consolidating proposed orders from the other currently pending motions.

Respectfully submitted,

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