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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

DONNA REED, individually and on behalf of all  
others similarly situated,

*Plaintiff,*

v.

LIGHT & WONDER, INC., f/k/a SCIENTIFIC  
GAMES CORP.,

*Defendant.*

No. 2: 18-cv-00565-RSL

**CLASS COUNSEL'S  
UNOPPOSED MOTION FOR  
APPROVAL OF SECOND  
DISTRIBUTION PLAN  
AND [PROPOSED] ORDER**

**UNOPPOSED MOTION FOR APPROVAL  
OF SECOND DISTRIBUTION PLAN**

1  
2 On August 12, 2022, this Court granted final approval to the Class Action Settlement and  
3 directed the Parties to “proceed with the Settlement procedures specified under the terms of the  
4 Settlement Agreement, including payment and prospective relief.” Dkt. #197 at 2. The  
5 Settlement Administrator in this case has since effected the process laid out in the Settlement  
6 Agreement for determining Settlement Payments and has paid from the Settlement Fund all  
7 Approved Claims. Dkt. #164-1 § 2.1(b)-(e). The Settlement Administrator also conducted  
8 outreach to claimants whose electronic deposits were unable to be processed and attempted to  
9 correct the problem, pursuant to Section 2.1(g) of the Settlement Agreement.

10 Despite diligent efforts, some payments were unsuccessful, and some checks remain  
11 uncashed. As a result, there is approximately \$370,000 remaining in the Settlement Fund as of  
12 the date of this filing (the “Reserve Fund”), representing approximately 1.5% of the Settlement  
13 Fund. Class Counsel therefore submits for the Court’s approval the following, unopposed Second  
14 Distribution Plan:

15 1. The Settlement Administrator will promptly make a second distribution to  
16 claimants from the Reserve Fund.

17 2. Specifically, the Settlement Administrator will allocate the Reserve Fund—less  
18 the administrative expenses of the second distribution—pro rata to all claimants who previously  
19 received Settlement Payments. However, to the extent a second distribution to a claimant would  
20 equal less than five dollars (\$5), that second distribution shall not be paid, and instead the  
21 amount shall be distributed pro rata to claimants whose second distribution is at least five dollars  
22 (\$5).

23 3. To the extent that any of these additional payments are not cashed/processed by  
24 claimants after ninety (90) calendar days, such funds shall be paid to the Legal Foundation of  
25 Washington—the *cy pres* recipient named in § 2.1(h) of the Settlement Agreement.

26 \* \* \*

1 This proposed Second Distribution Plan is fair, equitable, and faithfully effectuates the  
2 Settlement Agreement in this case. *See* Dkt. #164-1 § 2.1(h). Consequently, Class Counsel  
3 requests—and no Party opposes—that the Court grant this motion and enter the attached  
4 Proposed Order.

5  
6 Dated: May 15, 2023

Respectfully submitted,

7 **CLASS COUNSEL**

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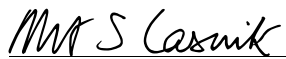
\*Admitted *pro hac vice*

**ORDER**

Class Counsel's unopposed motion is GRANTED. The Second Distribution Plan is approved.

IT IS SO ORDERED.

Dated this 16th day of May, 2023.



Robert S. Lasnik  
United States District Judge

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