

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

CHRISTOPHER J. GERKEN, DENNIS)
KEMP, TRAVIS KNIGHT and)
ANGELIQUE PERKINS, individually and)
on behalf of all others similarly situated,)
)
Plaintiffs,)

v.)

MANTECH INTERNATIONAL)
CORPORATION, BOARD OF DIRECTORS)
OF MANTECH INTERNATIONAL)
CORPORATION, THE RETIREMENT)
PLAN COMMITTEE, and JOHN DOES 1-)
30.)
Defendants.)

CIVIL ACTION NO.:

1:20-cv-01536

**PLAINTIFFS’ UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT, PRELIMINARY CERTIFICATION OF SETTLEMENT
CLASS, APPROVAL OF CLASS NOTICE, AND
SCHEDULING OF A FAIRNESS HEARING**

Plaintiffs Christopher J. Gerken, Dennis Kemp, Travis Knight, and Angelique Perkins (collectively “Plaintiffs”), participants in the ManTech International 401(k) Plan (the “Plan”), respectfully submit the Unopposed Motion for Preliminary Approval of Class Action Settlement, Preliminary Certification of Settlement Class, Approval of Class Notice, and Scheduling of A Fairness Hearing (“Motion for Preliminary Approval”) and respectfully move this Court for an Order granting preliminary approval of the proposed Settlement Agreement entered into with Defendants¹ (the “Settlement” or “Settlement Agreement”), (2) preliminarily certifying the

¹ “Defendants” refers, collectively, to ManTech International Corporation (“ManTech”), Board of Directors of ManTech International Corporation (“Board”), The Retirement Plan Committee (“Committee”), and John Does 1-30.

Settlement Class, (3) approving the form and manner of providing notice of the Settlement to the proposed Settlement Class (the “Notice Plan”), and (4) scheduling a Fairness Hearing. In support of the unopposed motion, Plaintiffs have submitted a declaration and memorandum of law contemporaneously.

For the reasons set forth in the accompanying memorandum of law, Plaintiffs submit the proposed Settlement is fair, reasonable, and adequate. Additionally, the proposed Settlement Class satisfies the requirements of Federal Rule of Civil Procedure 23(a) and (b)(1), thereby warranting preliminary certification for the purposes of this Settlement. Moreover, the Notice Plan satisfies the requirements of due process and is consistent with such Notice Plans as utilized in analogous actions. Accordingly, Plaintiffs respectfully submit preliminary approval of the Settlement should be granted, the Settlement Class should be preliminarily certified, the Notice Plan should be approved, and a Fairness Hearing should be scheduled.

A Proposed Order is submitted hereto.

Dated: December 29, 2020

Respectfully submitted,

/s/ Charles L. Williams

Charles L. Williams (VSB No. 23587)
WILLIAMS & SKILLING PC
7401 Mechanicsville Turnpike, Suite 204
Mechanicsville, Virginia 23111
Telephone: (804) 447-0307, ext. 305
Facsimile: (804) 447-0367
Email: cwilliams@williamsandskilling.com

Mark K. Gyandoh, Esquire
PA Attorney ID #88587
(Admitted Pro Hac Vice)
CAPOZZI ADLER, P.C.
312 Old Lancaster Road
Merion Station, PA 19066
markg@capozziadler.com
(610) 890-0200
Fax (717) 233-4103

CAPOZZI ADLER, P.C.
Donald R. Reavey, Esquire
(Admitted Pro Hac Vice)
PA Attorney ID #82498
2933 North Front Street
Harrisburg, PA 17110
donr@capozziadler.com
(717) 233-4101
Fax (717) 233-4103

Proposed Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of December, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Scott J. Pivnick, Esquire
Emily S. Costin, Esquire
Alston & Bird LLP
950 F Street, NW
Washington, DC 20004
*Counsel for Defendants ManTech International Corp., Bd of
Directors of ManTech International Corp. and The Retirement Plan
Committee*

/s/ Charles L. Williams
Charles L. Williams (VSB No. 23587)
WILLIAMS & SKILLING PC
7104 Mechanicsville Turnpike, Suite 204
Mechanicsville, Virginia 23111
Telephone: (804) 447-0307, ext. 305
Facsimile: (804) 447-0367
Email: cwilliams@williamsandskilling.com