

# **EXHIBIT 4**

October 4, 2020

NICHOLS KASTER, PLLP  
Attn: NRECA Plan Settlement  
4600 IDS Center  
80 South 8<sup>th</sup> Street  
Minneapolis, MN 55402

GROOM LAW GROUP, CHARTERED  
Attn: Sarah M Adams  
1701 Pennsylvania Ave., NW, Suite 1200  
Washington, DC 20006

RE: Thaddeus Intravaia, et al. v. NRECA, et al., Case No. 1:19-ev-00973-LO-IDD

To Whom It May Concern:

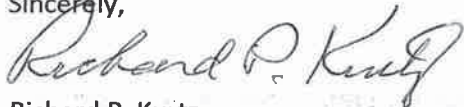
I, Richard P. Kurtz, have been noticed as a Class Member and Current Participant of the Settlement proposed as a result of the subject class action lawsuit. I understand that the Settlement calls for a \$10 million Settlement Fund. From that amount, a Net Settlement fund is to be determined at a Fairness Hearing on December 17, 2020.

The Net Settlement fund as reflected in the Notice is anticipated to reduce the Settlement Fund by Attorneys Fees (amounting to up to 1/3 of Settlement Funds) and Costs (actual and anticipated litigation costs and administrative expenses to be filed by Attorneys as Class Counsel and approved by the Court), and \$10,000 to each of the Class Representatives. The Net Settlement will then allocated to Class Members (Former and Current Participants) according to a Plan of Allocation to be approved by the Court.

The purpose of this letter is to object that the part of Class Counsel's compensation of **"up to 1/3 of Settlement Funds"** is excessive. At 1/3, Class Counsel's attorneys or firms (say e.g. 10) would realize compensation above Costs of up to **\$333,333** each. Though I really have no idea what Costs for Class Counsel may be, if one assumes about \$1.5 million, the approximately 65,000 Participants would share in a Net Settlement Fund of about \$5.0 million (average about \$75 each). **This resulting distribution of the Settlement Fund between Class Counsel and Class Members seems patently unfair to us Participants who were the victims of the alleged violations by NRECA.**

I submit this letter as a Class Member as directed in the Notice.

Sincerely,



Richard P. Kurtz  
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