

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ADRIANNE GARDNER-KEEGAN, SCOTT
A. NORMAN, and ALISON DELA RIVA,
individually, and as Representatives of a Class
of Participants and Beneficiaries of the W.W.
Grainger, Inc. Retirement Savings Plan,

Plaintiffs,

vs.

W.W. GRAINGER, INC., and W.W. GRAINGER,
INC., PROFIT SHARING INVESTMENT
COMMITTEE,

Defendants.

Case No. 1:25-cv-5233

Honorable Mary M. Rowland

**DECLARATION OF SCOTT A. NORMAN
IN SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

I, Scott A. Norman, declare and state as follows:

1. I worked for W.W. Grainger ("WWG") from May 2007 until November 2021. I was a public sector account manager at WWG's Raleigh, NC location.
2. I have been a participant in the W.W. Grainger, Inc. Retirement Savings Plan, during the Class Period.
3. I am fully aware of my duties as a class representative. I am not aware of any conflicts of interest between myself and other Class Members.
4. I take my duties as a class representative seriously, and I have attempted to fulfill those duties throughout the course of the litigation. Among other things, I have (1) reviewed the allegations in the various Complaints; (2) provided information and documents to counsel to assist in

the prosecution of the action; and (3) reviewed the Settlement Agreement in its entirety and communicated with counsel regarding the negotiation of the Settlement.

5. I am fully informed of the terms of the Settlement. I understand that I am a member of the Settlement Class, and I am satisfied with the terms that were reached.

6. I believe the \$2,850,000 monetary recovery represents a fair recovery for myself and the other Settlement Class Members, and I agree with the Plan of Allocation.

7. In my opinion, the Settlement is fair, reasonable, and adequate, both as to me and as to the other Settlement Class members. I approve the Settlement in this case and encourage the Court to approve the Settlement as well.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 10/5/2026 _____

Signed by:


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 Scott A. Norman