

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

PRO SLAB, INC., BREMER
CONSTRUCTION MANAGEMENT, INC., and
FORREST CONCRETE, LLC,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

ARGOS USA, LLC, et al.,

Defendants.

Case No. 2:17-cv-03185-BHH

**PLAINTIFFS' MOTION FOR APPROVAL OF PLAN OF DISTRIBUTION FOR
LAFARGE, THOMAS AND EVANS SETTLEMENT FUNDS**

Plaintiffs Pro Slab, Inc., Bremer Construction Management, Inc., and Michelle L. Vieira, Trustee of Forrest Concrete, LLC (collectively "Plaintiffs"), by Settlement Class Counsel, respectfully move the Court for an order approving their Plan of Distribution for the Settlement Funds from the Settlements with Lafarge North America, Inc., Evans Concrete, LLC and Thomas Concrete, Inc. and Thomas Concrete Of South Carolina, Inc.

In support of this motion, Plaintiffs submit herewith their Memorandum in Support and the Declaration of Janeth Antonio of Verita Global LLC and Exhibits thereto.

Dated: October 31, 2025

Respectfully submitted,

/s/Russell T. Burke

Russell T. Burke

Fed. Bar No. 1604

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Interim Plaintiffs' Co-Lead Counsel

¹ Special Counsel for Trustee Michelle Vieira of Forrest Concrete, LLC, *In re: Forrest Concrete, LLC, Debtor*, Case No. 23-01171-jd, Chapter 7, U.S. Bankruptcy Court, District of South Carolina.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 31, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will cause a true and correct copy to be served via e-mail on all ECF-registered counsel of record.

/s/Russell T. Burke

Russell T. Burke