Exhibit B

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

CHARLINDA WILLIAMS and RICHARD QUICHOCHO,

Plaintiffs,

-vs.-

FEDERAL EXPRESS CORPORATION,

Defendant

Case No. 1:24-cv-01056-JPB

PLAN OF ALLOCATION

1. **The Net Settlement Fund.** The Net Settlement Fund[1] will consist of the $900,000.00 paid by Defendant pursuant to the Settlement Agreement, plus any earnings and interest accrued thereon minus Court-approved attorneys' fees or expenses.

2. **Authorized Claimants.** An Authorized Claimant will be any member of the Pay Class as certified by the Court.

3. **Allocation of the Net Settlement Fund.** The Net Settlement Fund will be allocated pro rata among the Authorized Claimants based on the Recognized Claim for each Class Member as compared to total Recognized

[1] All capitalized terms not defined herein have the meaning afforded them by the Class Action Settlement Agreement between Plaintiff and Defendant dated March 1, 2023.

Claims for all Authorized Claimants.

4. **Recognized Claim.** The amount of an Authorized Claimant's Recognized Claim will be the amount of compensation that Authorized Claimant would have earned from FedEx had they not taken short-term military leave (periods of 14 days or fewer) from their employment with FedEx during the Class Period. This amount will be calculated based on military leave data and wage/salary data produced by FedEx unless a Pay Class Member establishes that such data is incorrect and should be adjusted.

5. **Initial Distribution to Authorized Claimants.** A distribution to Authorized Claimants will be made after the Final Approval Order is Non-Appealable (the "Initial Distribution"). Checks to Authorized Claimants will state that they are void 90 days from the date of issue.

6. **Second Distribution to Authorized Claimants.** A second distribution will be made to those Authorized Claimants who endorsed their Initial Distribution checks within 90 days after issuance from the Initial Distribution only if after the Initial Distribution the Net Settlement Fund contains or subsequently has sufficient monies to pay the costs of administering a second distribution to Authorized Claimants and a second distribution is otherwise economically feasible (the "Second Distribution"). Checks to Authorized Claimants will state that they are void 90 days from the date of issue.

7. **Residual Funds.** In the event that monies remain in the Net Settlement Fund following both the Initial Distribution and the Second Distribution (or, if a Second Distribution is not economically feasible, after the Initial Distribution), and after all taxes and other expenses have been paid, those residual amounts will be distributed to a non-profit 501(c)(3) charitable organization(s) recommended by Co-Lead Class Counsel and approved by the Court consistent with the principles of cy pres.

8. **Continuing Jurisdiction.** The Court shall retain jurisdiction over implementation of the Plan of Allocation and disposition of the Settlement Fund, including to allow, disallow, or adjust the claim of any Class Member on equitable grounds.