

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Stuart Krohnengold, Wayne Antoine, Lee
Webber, Anthony Medici, Joseph Bendrihem,
Larry Gilbert, Rafael Musni, Thomas Lantz,
Sandra Scanni, and Claudia Gonzalez, as
representatives of a class of similarly situated
persons, and on behalf of the New York Life
Insurance Employee Progress Sharing
Investment Plan, and the New York Life
Insurance Company Agents Progress Sharing
Plan,

Case No. 1:21-cv-01778 - JMF

Plaintiffs,

v.

New York Life Insurance Company; the
Fiduciary Investment Committee; the Board
of Trustees; Katherine O'Brien; Anthony R.
Malloy; Yie-Hsin Hung; Arthur A. Seter;
Scott L. Lenz; Robert J. Hynes; and John and
Jane Does 1-20,

Defendants.

**DECLARATION OF AMY LAURENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

I, Amy Laurence, declare and state as follows:

1. My late husband, Stuart Krohnengold, was the lead named Plaintiff in the above-captioned action until he passed away, and was a participant in the New York Life Insurance Company Employee Progress-Sharing Investment Plan (the "Employee Plan").

2. I am the beneficiary of his Employee Plan Account, and am now serving as a substitute Plaintiff in the action. I submit this Declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, and in support of my accompanying request to be appointed as a class representative.

3. Stuart's Employee Plan Account was invested in the Fixed Dollar Account, the MainStay Income Builder Fund, and the MainStay Epoch U.S. All Cap Fund during the relevant class period.

4. Stuart actively participated in this action, and I know he was committed to the case. As discussed in his prior declaration (ECF 119), he: (1) reviewed the allegations in the complaints bearing his name; (2) communicated with counsel and provided documents and information to them; (3) provided information in response to Defendants' Interrogatories; (4) produced documents in response to Defendants' document requests; and (5) testified under oath in a deposition on July 19, 2023.

5. I understand my responsibilities as a substitute class representative. Prior to agreeing to serve in this capacity, I reviewed and signed a form outlining those duties similar to the one that my husband signed.


6. In the event that I am appointed as a class representative, I will represent the interests of other class members as I would my own, and I have attempted to do so as a substitute party in connection with the Settlement. I am not aware of any conflicts of interest between myself and other New York Life retirement plan participants.

7. I am fully informed of the terms of the Settlement and have had the opportunity to discuss the Settlement with counsel. I believe the \$19 million recovery is a fair recovery for myself and other Class Members in light of the potential risks and delay involved in further litigation, and I am in agreement with the plan of allocation.

8. 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 to the best of my knowledge.

Dated: 2/20/2024 | 1:44 PM PST

DocuSigned by:

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Amy Laurence