

**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.

**PLAINTIFFS' NOTICE OF MOTION FOR ATTORNEYS' FEES, EXPENSES, AND
CLASS REPRESENTATIVE SERVICE AWARDS**

PLEASE TAKE NOTICE that on July 18, 2024 at 3:00 p.m., before the Honorable Jesse
M. Furman, United States District Judge, Plaintiffs Amy Laurence,¹ Wayne Antoine, Lee Webber,
Anthony Medici, Joseph Bendrihem, Larry Gilbert, Rafael Musni, Thomas Lantz, Sandra Scanni,
and Claudia Gonzalez ("Plaintiffs") will and hereby do move this Court for an Order awarding:
(1) attorneys' fees to Class Counsel in the amount of \$6,270,000 (33% of the Gross Settlement

¹ Ms. Laurence is the successor and substitute party for Stuart Krohnengold. *See* ECF 173.

Amount of \$19 million); (2) litigation expenses in the amount of \$465,573.76 and settlement administration expenses in the amount of \$121,762; and (3) class representative service awards in the amount of \$10,000 to each of the Class Representatives.

This motion is made pursuant to Federal Rule of Civil Procedure 23(h) and Section VI of the Parties' Class Action Settlement Agreement (ECF 176-1), and is based on the accompanying Memorandum of Law and authorities cited therein, the Declaration of Kai Richter and exhibits attached thereto, the prior declarations of the Class Representatives (ECF Nos. 177-186), and all files, records, and proceedings in this matter.

Counsel for Plaintiffs have conferred with counsel for Defendants regarding this motion, and have been advised that Defendants do not oppose the motion. As of the date of this motion, there have been no objections to the Settlement or the proposed distributions.

Respectfully Submitted,

Dated: June 5, 2024

/s/ Kai Richter
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