

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Jennifer Baker and Jean Greenberg, as
representatives of a class of similarly situated
persons, and on behalf of the Investment-
Incentive Plan for John Hancock Employees,

Plaintiffs,

v.

John Hancock Life Insurance Company
(U.S.A.) and the John Hancock US Benefits
Committee,

Defendants.

Case No. 1:20-cv-10397-GAO

**PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Plaintiffs Jennifer Baker and Jean Greenberg (together, "Plaintiffs"), as representatives of the class previously certified by the Court (*see ECF No. 53*) and on behalf of the Investment-Incentive Plan for John Hancock Employees, respectfully move this Court for an Order: (1) preliminarily approving the Parties' Class Action Settlement Agreement; (2) approving the proposed Notices of Settlement; (3) certifying the proposed Settlement Class for purposes of Settlement; (4) scheduling a Fairness Hearing; and (5) granting such other relief as set forth in the proposed Preliminary Approval Order submitted herewith.

This motion is made pursuant to Federal Rule of Civil Procedure 23(e), and is based on the accompanying Memorandum of Law and authorities cited therein, the Declaration of Kai Richter and exhibits thereto, the Declarations of Jennifer Baker and Jean Greenberg, the Parties' Settlement Agreement, and all files, records, and proceedings in this matter.

Defendants John Hancock Life Insurance Company (U.S.A.) and the John Hancock US Benefits Committee do not oppose this motion as parties to the Settlement.

Dated: June 1, 2021

NICHOLS KASTER, PLLP

By: /s/ Kai H. Richter

Kai H. Richter, MN Bar No. 0296545*

Paul J. Lukas, MN Bar No. 022084X*

Brock J. Specht, MN Bar No. 0388343*

Jacob T. Schutz, MN Bar No. 0395648*

* *admitted pro hac vice*

4700 IDS Center

80 S 8th Street

Minneapolis, MN 55402

Telephone: 612-256-3200

Facsimile: 612-338-4878

lukas@nka.com

krichter@nka.com

bspecht@nka.com

jschutz@nka.com

BLOCK & LEVITON LLP

Jason M. Leviton (BBO #678331)

BLOCK & LEVITON LLP

260 Franklin Street, Ste. 1860

Boston, Massachusetts 02110

(617) 398-5600

jason@blockesq.com

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2021, a true and correct copy of the foregoing *Plaintiffs'* *Motion for Preliminary Approval of Class Action Settlement* was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Kai H. Richter

Kai H. Richter