

**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

**DECLARATION OF JEAN  
GREENBERG**

I, Jean Greenberg, declare and state as follows:

1. I am one of the named class representatives in the above-captioned action, and I submit this Declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement.

2. I am a participant in the Investment-Incentive Plan for John Hancock Employees (the "Plan"). During the time that I have participated in the Plan, I have invested in multiple investment options affiliated with John Hancock.

3. I take my duties as a class representative seriously, and have attempted to fulfill those duties throughout the course of the litigation. Among other things, I have (1) reviewed the allegations in the First Amended Complaint, and provided information to my counsel prior to the filing of it; (2) produced documents in response to Defendants' requests for production; (3) provided information in response to Defendants' interrogatories, and reviewed and signed the interrogatory responses; (4) communicated with counsel regarding the action; (5) reviewed the Court's order denying Defendants' motion to dismiss; (6) reviewed the Settlement Agreement in its entirety and communicated with counsel regarding the Settlement; and (7) kept myself informed about the case.

4. I am fully informed of the terms of the Settlement. I understand that I am a member of the Settlement Class, and am satisfied with the terms that were reached.

5. I believe the \$14 million monetary recovery represents a fair recovery for myself and the other Settlement Class Members, and am in agreement with the plan of allocation.

6. I am also pleased that the Settlement provides for prospective relief, including that Defendants will retain a third-party investment consultant to monitor and review the Plan's investment options for at least five years, adopt an investment policy statement for the Plan, and use an independent consultant to assist with negotiating the next recordkeeping agreement and issuing a request for information for recordkeeping services.

7. In my opinion, the Settlement is fair, reasonable and adequate, both as to me and as to the other Settlement Class members. I approve the Settlement in this case, and encourage the Court to approve the Settlement as well.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 06/01/2021

By:   
Jean Greenberg

#### **CERTIFICATE OF SERVICE**

I hereby certify that on June 1, 2021, a true and correct copy of the foregoing *Declaration of Jean Greenberg* was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Kai H. Richter  
Kai H. Richter