

**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
APPROVAL OF ATTORNEYS' FEES
AND COSTS, ADMINISTRATIVE
EXPENSES, AND CLASS
REPRESENTATIVE SERVICE AWARDS**

PLEASE TAKE NOTICE that Plaintiffs Jennifer Baker and Jean Greenberg (together, "Plaintiffs"), will and hereby do move this Court for an Order awarding: (1) attorneys' fees to Class Counsel in the amount of \$3,500,000 (25% of the \$14 million Settlement Fund); (2) reimbursement of \$38,475.13 in litigation costs and \$85,087 in settlement administration expenses; and (3) service awards in the amount of \$10,000 to each of the Plaintiffs as class representatives (\$20,000 total).

This motion is scheduled to be heard at the time of the Fairness Hearing on September 29, 2021 at 2:00 p.m. in Courtroom 21 of the John Joseph Moakley U.S Courthouse, 1 Courthouse Way, Boston, Massachusetts. This motion is made pursuant to Federal Rule of Civil Procedure 23(h) and Article VII of the Parties' Class Action Settlement Agreement (ECF No. 64-1), and is based on the accompanying Memorandum of Law and authorities cited therein; the Declarations of Kai Richter and Jason Leviton and the exhibits thereto; the declarations previously submitted by the Class Representatives (ECF Nos. 65-66); the Parties' Class Action Settlement Agreement; the Court's Preliminary Approval Order (ECF No. 67); and all files, records, and proceedings.

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

Dated: August 25, 2021

NICHOLS KASTER, PLLP

By: /s/ Kai H. Richter

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CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2021, a true and correct copy of the foregoing *Plaintiffs' Motion for Approval of Attorneys' Fees And Costs, Administrative Expenses, and Class Representative Service Awards* was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Kai H. Richter

Kai H. Richter