

**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 FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

PLEASE TAKE NOTICE that on September 29, 2021 at 2:00 p.m., before the Honorable Richard G. Stearns, Plaintiffs Jennifer Baker and Jean Greenberg (together, "Plaintiffs"), will and hereby do move this Court for an Order granting final approval of the Parties' proposed Class Action Settlement Agreement. This motion is made pursuant to Federal Rule of Civil Procedure 23, this Court's Preliminary Approval Order dated June 2, 2021 (*ECF No. 67*), and Paragraph 2.3 of the Parties' Class Action Settlement Agreement (*ECF No. 64-01*), and is based on the accompanying Memorandum of Law and authorities cited therein, the declarations of Kai Richter and Jeffrey Mitchell and exhibits attached thereto, the Parties' Settlement Agreement, and all files, records, and proceedings in this matter. A proposed Final Approval Order is being submitted in connection with this motion.

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: September 15, 2021

**NICHOLS KASTER, PLLP**

By: /s/ Kai H. Richter  
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**LOCAL RULE 7.1 CERTIFICATION**

I, Kai Richter, hereby certify that plaintiffs conferred with counsel for Defendants in good faith on September 14, 2021 regarding the issues raised in this motion and have been advised that Defendants do not oppose the motion.

Dated: September 15, 2021

s/ Kai Richter  
Kai Richter

**CERTIFICATE OF SERVICE**

I hereby certify that on September 15, 2021, a true and correct copy of the foregoing *Plaintiffs' Motion for Final 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