

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

PAULETTE T. GLOVER and JOHN T.
WAREHIME, on behalf of themselves and all
others similarly situated,

No. 3:16-cv-00827-MPS

Plaintiffs,

v.
CONNECTICUT GENERAL LIFE
INSURANCE COMPANY; and THE
LINCOLN NATIONAL LIFE INSURANCE
COMPANY,

Defendants.

**CLASS COUNSEL'S MOTION FOR ATTORNEYS' FEES, EXPENSE
REIMBURSEMENT, AND SERVICE AWARDS**

Pursuant to Federal Rule of Civil Procedure 23(h) and the equitable common fund doctrine, Class Counsel move for an attorneys' fee award of 25% of the Settlement Fund. As explained in the accompanying Memorandum and supporting materials, Class Counsel's request for 25% of the fund produces a reasonable fee under the factors identified in *Goldberger v. Integrated Resources, Inc.*, 209 F.3d 43 (2d Cir. 2000), including the substantial time and labor expended by Class Counsel; the magnitude and complexities of this litigation; the significant risk of the litigation; the high quality of representation provided by Class Counsel; the requested fee in relation to the Settlement; and public policy considerations.

Class Counsel also move for the reimbursement of their litigation expenses from the Settlement Fund in the amount of \$154,956.54 (to be potentially updated prior to final approval) and for the Court to approve service awards of \$25,000 for Plaintiff Glover and \$10,000 for Plaintiff Warehime, as provided by the Settlement, to compensate them for their efforts on behalf of the Settlement Class. As explained in the accompanying Memorandum and supporting materials, each of these requests is supported by the facts and law.

Oral Argument Requested

WHEREFORE, for the reasons stated in the accompanying Memorandum, Class Counsel respectfully request that the Court grant their Motion for Attorneys' Fees, Expense Reimbursement, and Service Awards.

Dated: November 4, 2024

Respectfully submitted,

STUEVE SIEGEL HANSON LLP

/s/ Norman E. Siegel

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CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2024, I filed the foregoing document via the Court's ECF system, which will cause a true and correct copy of the same to be served electronically on all ECF-registered counsel of record.

/s/ Norman E. Siegel

Attorney for Plaintiffs and the Settlement Class