

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JEFFREY LEONARD, IN HIS CAPACITY AS)	
TRUSTEE OF THE POPLAWSKI 2008)	
INSURANCE TRUST; PHYLLIS POPLAWSKI;)	Civil Action No. 18-cv-04994-AKH
PBR PARTNERS, BRIGHTON TRUSTEES,)	
LLC, on behalf of and as trustee for COOK)	
STREET MASTER TRUST III; BANK OF)	
UTAH, solely as security intermediary for COOK)	
STREET MASTER TRUST III; PEAK TRUST)	
COMPANY, AK, on behalf of and as trustee for)	
SUSAN L. CICIORA TRUST and STEWART)	
WEST INDIES TRUST; and ADVANCE TRUST)	
& LIFE ESCROW SERVICES, LTA, as)	
securities intermediary for LIFE PARTNERS)	
POSITION HOLDER TRUST, on behalf of)	
themselves and all others similarly situated,)	
)	
Plaintiffs,)	
vs.)	
)	
JOHN HANCOCK LIFE INSURANCE)	
COMPANY OF NEW YORK and JOHN)	
HANCOCK LIFE INSURANCE COMPANY)	
(U.S.A.),)	
)	
Defendants.)	
)	
)	
)	

**NOTICE OF CLASS COUNSEL’S MOTION FOR ATTORNEYS’ FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND INCENTIVE AWARDS**

PLEASE TAKE NOTICE that Class Counsel for Class Plaintiffs Jeffrey Leonard, in his capacity as Trustee of the Poplawski 2008 Insurance Trust; Phyllis Poplawski; PBR Partners, Brighton Trustees, LLC, on behalf of and as Trustee for Cook Street Master Trust III; Bank Of Utah, solely as Security Intermediary for Cook Street Master Trust III; Peak Trust Company, AK, on behalf of and as Trustee for Susan L. Ciciora Trust and Stewart West Indies Trust; and Advance Trust & Life Escrow Services, LTA, as Securities Intermediary for Life Partners Position Holder

Trust, on behalf of themselves and the Settlement Class, will move this Court before the Honorable Alvin K. Hellerstein for an order for attorneys' fees, reimbursement of litigation expenses, and incentive awards for the Class Plaintiffs.

In support of the motion, Class Counsel will rely upon the accompanying memorandum of law, the declarations attached thereto, and other written or oral argument as may be requested or permitted by the Court.

Dated: March 11, 2022

/s/ Seth Ard

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