

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

PHT HOLDING I LLC, and ALICE  
CURTIS, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

RELIASTAR LIFE INSURANCE  
COMPANY,

Defendant.

Civ. No.: 18-cv-2863 DWF/TNL

**CLASS COUNSEL'S MEET-AND-  
CONFERENCE STATEMENT**

I, Steven Sklaver, representing Plaintiffs PHT Holding I LLC and Alice Curtis, on behalf of themselves and on behalf of the certified Class in this Action, hereby certify that, pursuant to the parties' Settlement Agreement, Defendant ReliaStar Life Insurance Company ("RLIC") agreed "not to oppose Plaintiffs' motion for Class Counsel's Fees and Expenses" if the fees requested did not exceed 33 1/3% of the gross benefits provided to the Final Class Members. Dkt. 259-2 ¶ 5.2. The instant motion seeks 33 1/3% of the gross benefits provided and is therefore consistent with the amounts set forth in the Settlement Agreement, as well as the notice provided to members of the Class.

Class Counsel's Motion for Attorneys' Fees, Reimbursement of Litigation Expenses, and Service Awards is therefore not opposed by Defendant RLIC.

Signed this 21st day of September, 2023.

Signature of Party /s/ Steven G. Sklaver

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