

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

ADVANCE TRUST & LIFE ESCROW  
SERVICES, LTA, as securities  
intermediary for LIFE PARTNERS  
POSITION HOLDER TRUST, and  
ALICE CURTIS, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

RELIASTAR LIFE INSURANCE  
COMPANY,

Defendant.

Civ. No.: 0:18-cv-2863-DWF-BRT

**PLAINTIFFS' NOTICE OF HEARING ON MOTION FOR APPROVAL OF  
FORM AND MANNER OF CLASS NOTICE**

PLEASE TAKE NOTICE that Plaintiffs Advance Trust & Life Escrow Services, LTA, as securities intermediary for Life Partners Position Holder Trust, and Alice Curtis (together "Plaintiffs") will move this Court, on Thursday, June 2, 2022 at 11:00 a.m. CT before the Honorable Donovan W. Frank, United States District Judge for the United States District Court for the District of Minnesota, for an order granting Plaintiffs' Motion for Approval of Form and Manner fo Class Notice (the "Motion").

The grounds for this Motion are set forth and supported in the Memorandum of Law filed in compliance with Local Rule 7.1; the Declarations of Ryan T. Weiss and Jennifer Keough; the exhibits attached thereto; the arguments of counsel; and all of the papers and proceedings in this matter.

Dated: May 19, 2022

Respectfully submitted,

By: /s/ Ryan Weiss

SUSMAN GODFREY L.L.P.  
Steven Sklaver (*Pro Hac Vice*)  
Glenn Bridgman (*Pro Hac Vice*)  
Rohit D. Nath (*Pro Hac Vice*)  
1900 Avenue of the Stars, Suite 1400  
Los Angeles, CA 90067  
Phone: (310) 789-3100  
ssklaver@susmangodfrey.com  
gbridgman@susmangodfrey.com  
rnath@susmangodfrey.com

Seth Ard (*Pro Hac Vice*)  
Ryan C. Kirkpatrick (*Pro Hac Vice*)  
1301 Avenue of the Americas, 32nd Floor  
New York, NY 10019  
Phone: (212) 336-8330  
sard@susmangodfrey.com  
rkirkpatrick@susmangodfrey.com

Ryan Weiss (*Pro Hac Vice*)  
Krisina Zuñiga (*Pro Hac Vice*)  
1000 Louisiana Street, Suite 5100  
Houston, TX 77002  
Phone: (713) 651-9366  
rweiss@susmangodfrey.com  
kzuniga@susmangodfrey.com

MERCHANT & GOULD P.C.  
Thomas J. Leach (MN 311844)  
Michael A. Erbele (MN 393635)  
150 South Fifth Street, Suite 2200  
Minneapolis, MN 55402-4247  
Phone: (612) 332-5300  
tleach@merchantgould.com  
merbele@merchantgould.com

Peter Gergely (*Pro Hac Vice*)  
1801 California Street, Suite 3300  
Denver, CO 80202

Phone: (303) 357-1670  
pgergely@merchantgould.com

*Attorneys for Plaintiffs*