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 MOTION FOR ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES, AND SERVICE AWARDS Pursuant to Federal Rule of Civil Procedure 23 and Local Rule 7.1, Class Counsel for Plaintiffs PHT Holding I LLC and Alice Curtis, on behalf of themselves and on behalf of the certified Class in this Action, move this Court before the Honorable Donovan W. Frank for an order for attorneys' fees, reimbursement of litigation expenses, and service awards for each of the Class Representatives. This motion is unopposed by the Defendant.

This motion is supported by an accompanying memorandum of law, to be filed in compliance with Local Rule 7.1; the Declarations of Seth Ard, Jennifer Keough, Thomas J. Leach, and Robert Mills; the papers and records on file with this Court; and by such information and evidence as may be presented at the final fairness hearing, scheduled to take place on November 16, 2023, at 12:00 pm.

Dated: September 21, 2023

/s/ Steven G. Sklaver

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