

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: LINCOLN NATIONAL COI LITIGATION

Case No.: 2:16-cv-6605-GJP

IN RE: LINCOLN NATIONAL 2017 COI  
RATE LITIGATION

Case No.: 2:17-cv-04150-GJP

**CLASS COUNSEL'S MOTION FOR APPROVAL OF  
COMMON FUND PAYMENT OF ATTORNEYS' FEES,  
LITIGATION EXPENSES, AND SERVICE AWARDS**

Pursuant to Federal Rule of Civil Procedure 23(h), Class Counsel hereby respectfully move the Court for an order approving the common fund payment of:

(a) approved attorneys' fees to Plaintiffs' Counsel totaling 33% of the Final Settlement Fund;

(b) approved litigation expenses to Plaintiffs' Counsel in the amount of \$2,345,671.06; and

(c) approved service awards in the amount of \$15,000 to each of following named Plaintiffs: Robert Rombro, Harriet Kanter, Ivan a Mindlin, Alan Mindlin, Richard Weinstein, Lowell Rauch, Carol Anne Rauch, Bharti R. Bharwani, Robert A. Zirinsky, US Life 1 Renditefonds GmbH & Co. Kg and US Life 2 Renditefonds GmbH & Co. Kg, Barbara Valentine, Barry Mukamal, Patricia Trincherro, Marshall Lewis Tutor, Arthur Kesselhaut, William Lin Patterson and Milgrim Investments.

This Motion is based on and supported by:

1. the Memorandum of Law in Support of Class Counsel's Motion for Approval of Common Fund Payment of Attorneys' Fees, Litigation Expenses, and Service Awards;

2. the Joint Declaration in Support of Class Counsel's Motion for Approval of Common Fund Payment of Attorneys' Fees, Litigation Expenses, and Service Awards;

3. the Declaration of Jeffrey W. Golan filed on behalf of Barack, Rodos & Bacine in Support of Motion for Approval of Common Fund Payment of Attorneys' Fees, Litigation Expenses, and Service Awards;

4. the Declaration of Andrew S. Friedman filed on behalf of Bonnett Fairbourn Friedman & Balint, PC in Support of Motion for Approval of Common Fund Payment of Attorneys' Fees, Litigation Expenses, and Service Awards;

5. the Declaration of Seth Ard filed on behalf of Susman Godfrey in Support of Motion for Approval of Common Fund Payment of Attorneys' Fees, Litigation Expenses, and Service Awards;

6. the Declaration of Howard M. Bushman filed on behalf of The Moskowitz Law Firm, PLLC in Support of Motion for Approval of Common Fund Payment of Attorneys' Fees, Litigation Expenses, and Service Awards;

7. the Declaration of Scott Grzenczyk filed on behalf of Girard Sharp LLP in Support of Motion for Approval of Common Fund Payment of Attorneys' Fees, Litigation Expenses, and Service Awards;

8. the Declaration of Gail A. McQuilkin filed on behalf of Kozyak Tropin & Throckmorton, LLP in Support of Motion for Approval of Common Fund Payment of Attorneys' Fees, Litigation Expenses, and Service Awards;

9. the Declaration of Patrick F. Madden, Esq. filed on behalf of Berger Montague PC in Support of Motion for Approval of Common Fund Payment of Attorneys' Fees, Litigation Expenses, and Service Awards;

10. the Declaration of Ronen Sarraf filed on behalf of Sarraf Gentile LLP in Support of Motion for Approval of Common Fund Payment of Attorneys' Fees, Litigation Expenses, and Service Awards;

11. the Joint Stipulation and Settlement Agreement filed March 24, 2023 [2016 Action ECF 247-1; 2017 Action ECF 121-1]; and

12. the Court's files in the above-captioned actions.

Dated: August 4, 2023.

**BONNETT, FAIRBOURN, FRIEDMAN  
& BALINT, P.C.**

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