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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

LINCOLN ADVENTURES, LLC, a
Delaware Limited Liability Company,
and MICHIGAN MULTI-KING, INC.,
a Michigan Corporation, on Behalf of
Themselves and All Those Similarly
Situated,

Plaintiffs,

vs.

THOSE CERTAIN UNDERWRITERS
AT LLOYD’S, LONDON MEMBERS
OF SYNDICATES, et al.

Defendants.

) No. 2:08-cv-00235-CCC-JAD

) CLASS ACTION

) NOTICE OF MOTION AND MOTION
) FOR FINAL APPROVAL OF
) PARTIAL CLASS ACTION
) SETTLEMENT

) Motion Return Date: September 18, 2019

_____)

PLEASE TAKE NOTICE that on September 18, 2019, or such other date as the Court may set, Plaintiffs Lincoln Adventures, LLC and Michigan Multi-King, Inc., on behalf of the Settlement Class, through counsel, shall move the Honorable Claire C. Cecchi, pursuant to the Court's Order Preliminarily Approving Proposed Partial Class Action Settlement and Preliminarily Certifying a Class for Settlement Purposes entered on May 3, 2019 (ECF 93), for the entry of a Final Order Approving Partial Class Action Settlement.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs will reply upon: Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Partial Class Action Settlement; Joint Declaration of Rachel L. Jensen and Robert S. Schachter in Support of Plaintiffs' Motions for: (1) Final Approval of Partial Class Action Settlement; and (2) an Award of Attorneys' Fees and Expenses/Charges and Service Awards; Declaration of Eric J. Miller; Stipulation of Partial Class Action Settlement; and all other proceedings herein.

A proposed order will be submitted with Plaintiffs' reply submission on or before September 11, 2019.

Plaintiffs seek oral argument on this motion.

DATED: August 14, 2019

Respectfully submitted,

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