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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 AN AWARD OF ATTORNEYS’
) FEES AND EXPENSES/CHARGES
) AND SERVICE AWARDS

) Motion Return Date: September 18, 2019

_____)

PLEASE TAKE NOTICE that on September 18, 2019, or such other date as the Court may set, the undersigned counsel for Plaintiffs shall move before 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 an order awarding attorneys' fees and payment of litigation expenses and service awards for the named Plaintiffs.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs will reply upon: Memorandum of Law in Support of Plaintiffs' Motion for an Award of Attorneys' Fees and Expenses/Charges and Service Awards; 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; Declaration of Rachel L. Jensen; Declaration of Robert S. Schachter; Declaration of Van Bunch; Declaration of Ellen Meriwether; Declaration of Robert Foote; Declaration of Peter S. Pearlman; Declaration of David M. Foster; 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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