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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,)	No. 2:08-cv-00235-CCC-ESK
)	
)	<u>CLASS ACTION</u>
)	NOTICE OF MOTION AND MOTION
)	FOR AN AWARD OF ATTORNEYS'
)	FEEES AND EXPENSES AND SERVICE
Plaintiffs,)	AWARDS
)	
vs.)	Motion Return Date: December 14, 2023
)	
THOSE CERTAIN UNDERWRITERS AT LLOYD'S, LONDON MEMBERS OF SYNDICATES, et al.)	
)	
Defendants.)	
)	

PLEASE TAKE NOTICE that on December 14, 2023, 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 July 10, 2023 (ECF 280), 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 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 and Service Awards; Declaration of Mark Cowen; Declaration of Alexandra S. Bernay; Declaration of Robert S. Schachter; Declaration of Van Bunch; Declaration of Dan Drachler; Declaration of Robert Foote; Declaration of Peter S. Pearlman; Stipulation of Partial Class Action Settlement; and all other proceedings herein.

Plaintiffs seek oral argument on this motion.

DATED: November 9, 2023

Respectfully submitted,

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s/ Rachel L. Jensen
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