

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Richmond Division)

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| JEROME SKOCHIN, SUSAN SKOCHIN and) | Civil Action No. 3:19-cv-00049-REP |
| LARRY HUBER, Individually and on Behalf) | |
| of All Others Similarly Situated,) | <u>CLASS ACTION</u> |
|) | |
| Plaintiffs,) | |
|) | |
| vs.) | |
|) | |
| GENWORTH LIFE INSURANCE) | |
| COMPANY, and GENWORTH LIFE) | |
| INSURANCE COMPANY OF NEW YORK,) | |
|) | |
| Defendants.) | |
|) | |

CLASS COUNSEL’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND EXPENSES AND SERVICE AWARDS TO THE NAMED PLAINTIFFS

Plaintiffs Jerome Skochin, Susan Skochin, and Larry Huber (collectively, “Named Plaintiffs”), respectfully move the Court for entry of an Order: (i) awarding attorneys’ fees in the amount of \$2,000,000.00 relating to the injunctive relief achieved for the Settlement Class, and an additional contingent payment of 15% of certain amounts related to Special Election Options selected by the Settlement Class, in an amount no less than \$10,000,000.00 and no greater than \$24,500,000.00, as well as payment of litigation expenses of \$64,398.66, to be paid in accordance with the terms of the Joint Stipulation of Class Action Settlement and Release; and (ii) awarding service awards of \$25,000.00 to each of the Named Plaintiffs in connection with their representation of the Settlement Class. The grounds and reasons for granting this relief are stated with particularity in the accompanying brief and other supporting papers.

Pursuant to this Court's Order Granting Preliminary Approval of Settlement and Directing Notice to the Class (ECF No. 98), a hearing is set for July 10, 2020 at 10:00 a.m. Proposed orders will be submitted with Named Plaintiffs' reply submission on or before June 26, 2020.

DATED: May 25, 2020

PHELAN PETTY, PLC

/s/ Jonathan M. Petty

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Attorneys for Plaintiffs and Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2020, I filed the foregoing pleading or paper through the Court's CM/ECF system, which sent a notice of electronic filing to all registered users.

/s/ Jonathan M. Petty

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