

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ELIZABETH RUSSETT, BETH CALABRESE, and
JAN BULLARD, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

THE NORTHWESTERN MUTUAL LIFE
INSURANCE COMPANY,

Defendant.

Civil Action No. 7:19-cv-07414-KMK

**NOTICE OF MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on October 6, 2020 at 10:30 a.m. before the Honorable Kenneth M. Karas, United States District Judge for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601, Plaintiffs Elizabeth Russett, Beth Calabrese, and Jan Bullard (“Plaintiffs”), by and through Class Counsel will move and hereby do move for an order: (1) finally approving the Class Action Settlement, and (2) certifying the Settlement Class.

PLEASE TAKE FURTHER NOTICE that, in support of the motion, Plaintiffs will rely upon: (1) the accompanying Memorandum of Law, (2) the Declaration Philip L. Fraietta, and the exhibits attached thereto (including the Parties’ Class Action Settlement Agreement), and (3) the Declaration of Jennifer M. Keough, and the exhibits attached thereto.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby requests oral argument.

* * *

A Proposed Final Judgment and Order of Dismissal with Prejudice is submitted herewith.

Dated: September 22, 2020

Respectfully submitted,

By: /s/ Philip L. Fraietta
Philip L. Fraietta

BURSOR & FISHER, P.A.

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