

**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 ATTORNEYS' FEES, COSTS, EXPENSES,
AND INCENTIVE AWARDS**

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) approving the payment of attorneys' fees, costs, and expenses in the amount of one-third of the settlement fund, (2) granting Plaintiffs an incentive award of \$5,000 each in recognition of their efforts on behalf of the class, and (3) awarding such other and further relief as the Court deems reasonable and just.

PLEASE TAKE FURTHER NOTICE that, in support of the motion, Plaintiffs will rely upon the accompanying memorandum of law in support, the Declaration of Elizabeth Russett, the Declaration of Beth Calabrese, the Declaration of Jan Bullard, and the Declaration of Philip L. Fraietta, with annexed exhibits.

Dated: July 20, 2020

Respectfully submitted,

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

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