UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

EMMA GOIDEL, ILANA LEE, MADELEINE LEE, And LESLEY BROWN, On Behalf Of Themselves And All Others Similarly Situated,

Plaintiffs,

-against-

AETNA LIFE INSURANCE COMPANY,

Defendant.

Case No. 1:21-cv-07619 (VSB)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of the Settlement, the Declaration of Zoe Salzman dated May 3, 2024 and exhibits thereto, the Declaration of Bryn Bridley and exhibits thereto, and upon all prior pleadings, Plaintiffs, by their counsel Emery Celli Brinckerhoff Abady Ward & Maazel LLP ("ECBAWM") and the National Women's Law Center ("NWLC"), will move this Court at the United States Courthouse, 40 Foley Square, New York, New York, before the Honorable Vernon S. Broderick, United States District Judge, for an Order that:

- (i) Grants preliminary approval of the settlement agreement between the Parties dated April 18, 2024 (the "Settlement Agreement"), Ex. 1 to the Declaration of Zoe Salzman ("Salzman Decl."); ¹
- (ii) Preliminarily certifies the Injunctive Settlement Class and the Damages Settlement Class and appoints ECBAWM and the NWLC as class counsel ("Class Counsel");
- (iii) Approves Atticus Administration LLC as the settlement administrator (the

¹ All defined terms have the same meaning as they do in the Settlement Agreement. Salzman Decl., Ex. 1.

"Administrator");

Approves the form, content, and manner of notice to Potential Class Members (iv)

and authorizes notice to be distributed in the manner described in the Declaration

of Bryn Bridley, as well as the proposed notices to Potential Class Members and

the proposed Claim Form Package, see Bridley Decl. Exs. B-F;

(v) Orders Defendant to pay the costs of notice and administration to the

Administrator pursuant to the terms and conditions set forth in the Settlement

Agreement;

(vi) Sets a hearing date for consideration of final approval of the settlement, service

awards to Plaintiffs Emma Goidel, Ilana Lee, Madeleine Lee, and Lesley Brown,

and Class Counsel's application for attorneys' fees and expenses; and

(vii) Granting such other and further relief as may be just and proper.

Dated: May 3, 2024

New York, New York

By: /s/

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