

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOHN W. GRIFFITHS, on behalf of himself and)
all others similarly situated,)
Plaintiff,)
))
v.)
))
AVIVA LONDON ASSIGNMENT)
CORPORATION, AVIVA LIFE INSURANCE)
COMPANY, AVIVA INTERNATIONAL)
INSURANCE LTD, f/k/a CGU)
INTERNATIONAL INSURANCE, plc,)
ATHENE HOLDING, LTD,)
ATHENE LONDON ASSIGNMENT)
CORPORATION and)
ATHENE ANNUITY AND LIFE COMPANY,)
Defendants.)
_____)

Civil Action No. 15-cv-13022-NMG

**PLAINTIFF’S MOTION FOR FINAL APPROVAL OF THE SETTLEMENTS
AND FOR AWARD OF ATTORNEY’S FEES AND EXPENSES AND SERVICE AWARD
TO THE CLASS REPRESENTATIVE**

Plaintiff John W. Griffiths hereby MOVES this Court for entry of Orders granting Final Approval to the Settlements in this case, and for award of Attorney’s Fees and Expenses and a Service Award to the Class Representative, as set forth in greater detail in the Proposed Orders submitted herewith.

The grounds for this Motion are set forth in the Memorandum in support thereof, which is being filed contemporaneously herewith.

WHEREFORE, for the reasons set forth above, Plaintiff John W. Griffiths respectfully requests that this Court GRANT the within motion.

The Plaintiff
John W. Griffiths
By His Attorneys,

/s/ Jerome Marcus

Jerome M. Marcus, Esquire, *pro hac vice*

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/s/ Paul J. Klehm

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Dated: August 8, 2018

CERTIFICATION OF COMPLIANCE WITH L.R. 7.1(a)(2)

I hereby certify that, on August 7, 2018 at approximately 5:46 p.m., Attorney Jerome Marcus sent an email to Defendants' counsel asking whether he may represent to the Court that the Defendants do not oppose the within motion. In an email dated August 8, 2018 from Attorney Christopher Clark to Attorney Marcus, Attorney Clark, on behalf of the Aviva Defendants, wrote, "The Defendants Aviva International Insurance Ltd (f/k/a CGU International Insurance, plc) ("CGU") does not oppose approval of the settlement as set forth in the Settlement Agreement and Release between Plaintiff and CGU filed with the Court at Docket No. 125-2. CGU takes no position on Plaintiff's Fee and Expense Application." Shortly thereafter, Attorney Feldman wrote that that Athene Defendants take the same position. I received copies of these emails.

/s/ Paul J. Klehm

Paul J. Klehm

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants via first class mail, postage prepaid, on August 8, 2018.

/s/ Paul J. Klehm
Paul J. Klehm