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UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

LINCOLN ADVENTURES, LLC, a Delaware Limited Liability Company, and MICHIGAN MULTI-KING, INC., a Michigan Corporation, on Behalf of Themselves and All Those Similarly Situated, Plaintiffs, vs. THOSE CERTAIN UNDERWRITERS AT LLOYD'S, LONDON MEMBERS OF SYNDICATES, et al. Defendants.	No. 2:08-cv-00235-CCC-JSA CLASS ACTION OMNIBUS REPLY IN SUPPORT OF PARTIAL CLASS ACTION SETTLEMENT, PLAN OF ALLOCATION, AND PLAINTIFFS' COUNSEL'S APPLICATION FOR ATTORNEYS' FEE AND EXPENSE AWARD

On September 18, 2026, Plaintiffs filed a motion for final approval of a Partial Class Action Settlement ("Partial Settlement") with five Defendant Lloyd's Syndicates 727, 2791, 1003, 2003, and 2020 (the "Settling Defendants"). *See* ECF 359. On the same day, Plaintiffs filed a memorandum and supporting documents seeking an award of attorneys' fees and expenses. *See* ECF 360-361.

In the Court's Order preliminarily approving the proposed Partial Settlement, the Court ordered that replies to any objections be filed seven calendar days prior to the Fairness Hearing. *See* ECF 349, ¶13. The deadline to file any objections to the Partial Settlement, Plan of Allocation, Attorneys' Fee and Expense Award, or Service Awards was October 2, 2026. *See* ECF 349, ¶12(a). Co-Lead Counsel has received a single opt out request to the Partial Settlement. As explained in ECF 364, that opt out request lacks certain required information. The Claims Administrator is following up with the entity that sought exclusion and has not yet received a response. No objections to the Plan of Allocation or the motion for Attorneys' Fee and Expense Award have been received. The overwhelmingly positive reaction of the Settlement Class favors final approval of the Partial Settlement and the award of the requested attorneys' fees and expenses. To the extent any late-filed objections come in, Co-Lead Counsel will be prepared to address them at the October 23, 2026, final approval hearing.

DATED: October 16, 2026

Respectfully submitted,

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s/ *Michael Alderman*
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