

COHN LIFLAND PEARLMAN
HERRMANN & KNOPF LLP
MATTHEW F. GATELY
MICHAEL J. ALDERMAN
Park 80 West – Plaza One
250 Pehle Avenue, Suite 401
Saddle Brook, NJ 07663
Telephone: 201/845-9600
201/845-9423 (fax)

Attorneys for Plaintiffs

[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

LINCOLN ADVENTURES, LLC, a	)	No. 2:08-cv-00235-CCC-JSA
Delaware Limited Liability Company,	)	
and MICHIGAN MULTI-KING, INC.,	)	<u>CLASS ACTION</u>
a Michigan Corporation, on Behalf of	)	
Themselves and All Those Similarly	)	NOTICE OF MOTION AND MOTION
Situated,	)	FOR AN AWARD OF ATTORNEYS'
	)	FEEES AND EXPENSES
Plaintiffs,	)	
	)	Motion Return Date: October 23, 2026
vs.	)	
	)	
THOSE CERTAIN UNDERWRITERS	)	
AT LLOYD'S, LONDON MEMBERS	)	
OF SYNDICATES, et al.	)	
	)	
Defendants.	)	
_____	)	

PLEASE TAKE NOTICE that on October 23, 2026, or such other date as the Court may set, the undersigned counsel for Plaintiffs shall move before the Honorable Claire C. Cecchi, pursuant to the Court's Order Preliminarily Approving Proposed Partial Class Action Settlement and Preliminarily Certifying a Class for Settlement Purposes entered on May 19, 2026 (ECF 349), for the entry of an order awarding attorneys' fees and payment of litigation expenses.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs will reply upon: Memorandum of Law in Support of Plaintiffs' Motion for an Award of Attorneys' Fees and Expenses; Joint Declaration of Alexandra S. Bernay and Robert S. Schachter in Support of Plaintiffs' Motions for: (1) Final Approval of Partial Class Action Settlement; and (2) an Award of Attorneys' Fees and Expenses; Declaration of Eric J. Miller; Declaration of Alexandra S. Bernay; Declaration of Robert S. Schachter; Declaration of Matthew F. Gately; Declaration of Dan Drachler; Stipulation of Partial Class Action Settlement; and all other proceedings herein.

Plaintiffs seek oral argument on this motion.

DATED: September 18, 2026

Respectfully submitted,

COHN LIFLAND PEARLMAN
HERRMANN & KNOPF LLP
MATTHEW F. GATELY
MICHAEL J. ALDERMAN

/s/ Michael Alderman

MICHAEL J. ALDERMAN

Park 80 West – Plaza One
250 Pehle Avenue, Suite 401
Saddle Brook, NJ 07663
Telephone: 201/845-9600
201/845-9423 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
SAM S. SHELDON
ALEXANDRA S. BERNAY
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
PAUL J. GELLER
225 NE Mizner Boulevard, Suite 720
Boca Raton, FL 33432
Telephone: 561/750-3000
561/750-3364 (fax)

ZWERLING, SCHACHTER
& ZWERLING, LLP
ROBERT S. SCHACHTER
41 Madison Avenue
New York, NY 10010
Telephone: 212/223-3900
212/371-5969 (fax)

LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP
DAN DRACHLER
1215 Fourth Avenue, Suite 1350
Seattle, WA 98161
Telephone: 206/895-5005
206/895-3131 (fax)

BONNETT, FAIRBOURN, FRIEDMAN
& BALINT, P.C.
H. SULLIVAN BUNCH
2325 E. Camelback Road, Suite 300
Phoenix, AZ 85016
Telephone: 602/274-1100
602/274-1199 (fax)

FOOTE, MIELKE, CHAVEZ
& O'NEIL, LLC
ROBERT M. FOOTE
KATHLEEN C. CHAVEZ
10 West State Street, Suite 200
Geneva, IL 60134
Telephone: 630/232-7450
630/232-7452 (fax)

CAFFERTY CLOBES MERIWETHER
& SPRENGEL LLP
ELLEN MERIWETHER
205 N. Monroe Street
Media, PA 19063
Telephone: 215/864-2800
215/864-2810 (fax)

Attorneys for Plaintiffs