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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,	)	No. 2:08-cv-00235-CCC-JSA
	)	
	)	<u>CLASS ACTION</u>
	)	
	)	NOTICE OF MOTION AND MOTION
	)	FOR FINAL APPROVAL OF
	)	PARTIAL CLASS ACTION
Plaintiffs,	)	SETTLEMENT
	)	
vs.	)	Motion Return Date: October 23, 2026
	)	
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, Plaintiffs Lincoln Adventures, LLC and Michigan Multi-King, Inc., on behalf of the Settlement Class, through counsel, shall move 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 a Final Order Approving Partial Class Action Settlement.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs will reply upon: Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Partial Class Action Settlement; 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; Stipulation of Partial Class Action Settlement; and all other proceedings herein.

Plaintiffs seek oral argument on this motion.

DATED: September 18, 2026

Respectfully submitted,

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/s/ Michael Alderman

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