UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

HELEN HANKS, on behalf of herself and all others similarly situated,	Civil Action No. 16-cv-6399 (PKC)
Plaintiff,	
vs.	
VOYA RETIREMENT INSURANCE AND ANNUITY COMPANY, formerly known as Aetna Life Insurance and Annuity Company,	
Defendant.	

NOTICE OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

PLEASE TAKE NOTICE that Plaintiff Helen Hanks, individually and on behalf of the previously-certified Class, moves this Court before the Honorable P. Kevin Castel for an order pursuant to Rule 23 of the Federal Rules of Civil Procedure: (i) preliminarily approving the proposed Settlement, plan of allocation, and the form and manner of notice; (ii) directing notice to the Class under Rule 23(e)(1); and (iii) scheduling a final approval hearing at which the Court will consider final approval of the Settlement, final approval of the plan of allocation, and Class Counsel's motion for fees, costs, and service awards, based upon this notice of motion, the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, the supporting Declarations of Seth Ard, Robert A. Meyer, Esq., Robert Mills, and Jennifer M. Keough, and the exhibits attached thereto.

Dated: January 6, 2022 /s/ Seth Ard

Seth Ard

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Class Counsel

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing instrument has been served on the following counsel, this January 6, 2022.

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