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12 *Class Counsel*

13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**  
15 **WESTERN DIVISION**

16 LSIMC, LLC, on behalf of itself and all  
17 others similarly situated,

18 Plaintiff,

19 vs.

20 AMERICAN GENERAL LIFE  
INSURANCE COMPANY,

21 Defendant.

Case No. 2:20-cv-11518-SVW (PVCx)

**[PROPOSED] ORDER GRANTING  
CLASS COUNSEL'S NOTICE OF  
MOTION AND MOTION FOR  
ATTORNEYS' FEES,  
REIMBURSEMENT OF LITIGATION  
EXPENSES, AND SERVICE AWARD**

Date: June 26, 2023

Time: 1:30 p.m.

Ctrm: 10A

Judge: Stephen V. Wilson

1 WHEREAS, Plaintiff LSIMC, LLC, on behalf of itself and the Settlement  
2 Class, entered into a settlement (the “Settlement”) with Defendant American General  
3 Life Insurance Company (“AmGen”);

4 WHEREAS, on February 16, 2023, the Court entered an Order Granting  
5 Motion for Preliminary Approval of Settlement (“Preliminary Approval Order”).  
6 Dkt. 217. Among other things, the Preliminary Approval Order authorized Class  
7 Counsel to disseminate notice of the Settlement, the fairness hearing, and related  
8 matters to the Class. Notice was provided to the Class pursuant to the Preliminary  
9 Approval Order, and the Court held a fairness hearing on June 26, 2023, at 1:30pm;

10 WHEREAS, Class Counsel filed a motion for attorneys’ fees, reimbursement  
11 of litigation expenses, and a service award for the named Plaintiff; and

12 NOW THEREFORE, having considered Class Counsel’s “Motion for  
13 Attorneys’ Fees, Reimbursement of Litigation Expenses, and Service Award,”  
14 supporting materials, oral argument presented at the fairness hearing, and the  
15 complete records and files in this matter,

16 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:**

17 1. The capitalized terms used herein shall have the meanings set forth in  
18 the Settlement Agreement.

19 2. Class Counsel Susman Godfrey shall receive attorneys’ fees equal to  
20 \$8,000,000, to be paid from the Final Settlement Fund created by the Settlement,  
21 plus a pro rata share of the interest earned on the Final Settlement Fund at the same  
22 rate and for the same period as earned by the Final Settlement Fund, to be paid out  
23 of the Final Settlement Fund.

24 3. Class Counsel shall be reimbursed \$363,445.27 in costs and expenses  
25 reasonably incurred in the presentation and settlement of this litigation, to be paid  
26 out of the Final Settlement Fund created by the Settlement.  
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4. The Settlement Administration Expenses through February 28, 2023 are \$3,048.35. Under the terms of the Settlement Agreement, those costs are payable out of the Final Settlement Fund. Any additional Settlement Administration Expenses may be paid out of the Final Settlement Fund as they become due.

5. The Court shall entertain any supplemental application for reimbursement of expenses incurred by Class Counsel on behalf of the Settlement Class.

6. Plaintiff LSMIC shall be paid a service award equal to \$25,000, payable out of the Final Settlement Fund.

7. This Order shall become effective immediately.

IT IS SO ORDERED.

Dated: \_\_\_\_\_, 2023

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Stephen V. Wilson  
UNITED STATES DISTRICT JUDGE