

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ARBUCKLE FUNDING, LLC, and
BRIGHTON TRUSTEES LLC, on behalf of and
as Trustee for COOK STREET MASTER TRUST
III, individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

TALCOTT RESOLUTION LIFE AND
ANNUITY INSURANCE COMPANY and
TALCOTT RESOLUTION LIFE INSURANCE
COMPANY,

Defendants.

Civil Action No. 7:23-cv-07972-CS

**NOTICE OF CLASS COUNSEL’S MOTION FOR ATTORNEYS’ FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND INCENTIVE AWARD**

PLEASE TAKE NOTICE that Class Counsel for Plaintiffs Arbuckle Funding, LLC, and Brighton Trustees LLC, individually and on behalf of the Premium Tax Settlement Class, will move this Court before the Honorable Cathy Seibel for an order for attorneys' fees, reimbursement of litigation expenses, and an incentive award for Plaintiff Arbuckle Funding, LLC.

In support of the Motion, Class Counsel will rely upon the accompanying memorandum of law, the supporting Declaration of Ryan C. Kirkpatrick, the exhibits attached thereto, and other written or oral argument as may be requested or permitted by the Court.

Dated: August 11, 2026

Respectfully submitted,

/s/ Ryan Kirkpatrick

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify, that on August 11, 2026, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification to the attorneys of record and is available for viewing and downloading.

/s/ Ryan Kirkpatrick

Ryan C. Kirkpatrick

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ARBuckle FUNDING, LLC, and
BRIGHTON TRUSTEES LLC, on behalf of and as
Trustee for COOK STREET MASTER TRUST III,
individually and on behalf of all others similarly
situated,

Plaintiffs,

vs.

TALCOTT RESOLUTION LIFE AND
ANNUITY INSURANCE COMPANY and
TALCOTT RESOLUTION LIFE INSURANCE
COMPANY,

Defendants.

Civil Action No. 7:23-cv-07972-CS

[PROPOSED] ORDER AWARDING FEES, EXPENSES, AND INCENTIVE AWARD

WHEREAS, Plaintiffs Arbuckle Funding LLC (“Arbuckle Funding”) and Brighton Trustees LLC, on behalf of and as Trustee for Cook Street Master Trust III (“Brighton Trustees,” and together with Arbuckle Funding, “Plaintiffs”), on behalf of themselves and all others similarly situated, entered into a Stipulation of Settlement and Release (“Premium Tax Settlement Agreement”) with Defendants Talcott Resolution Life & Annuity Insurance Company and Talcott Resolution Life Insurance Company (collectively, “Talcott” or “Defendants”);

WHEREAS, on May 13, 2026, the Court entered its Order Preliminarily Certifying Premium Tax Settlement Class and Approving Premium Tax Settlement Class Action Settlement (“Preliminary Approval Order”) (ECF No. 127). Among other things, the Preliminary Approval Order authorized Class Counsel to provide notice of the Settlement, the fairness hearing, and related matters to the Premium Tax Settlement Class;

WHEREAS, notice was provided to the Premium Tax Settlement Class pursuant to the Preliminary Approval Order, and the Court held a fairness hearing on September 24, 2026;

WHEREAS, Class Counsel filed a fee application, seeking attorneys' fees, expenses, and an incentive award;

WHEREAS, this application is uncontested by Defendants;

NOW THEREFORE, having considered Class Counsel's Motion for Attorneys' Fees, Reimbursement of Litigation Expenses, and Incentive Award, the supporting declaration and exhibits, oral argument presented at the fairness hearing, and the complete records and files in this matter,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

1. The capitalized terms used herein shall have the meanings set forth in the Premium Tax Settlement Agreement.
2. Class Counsel Susman Godfrey L.L.P. shall receive attorneys' fees in the amount of \$3,666,666.67 from the Settlement Fund, plus a *pro rata* share of accrued interest.
3. Class Counsel shall be reimbursed \$203,493.98 in costs and expenses reasonably incurred in the presentation and settlement of this litigation, to be paid out of the Settlement Fund created by the Premium Tax Settlement Agreement.
4. The Claims Administration Expenses invoiced to date are \$43,919. Consistent with the terms of the Preliminary Approval Order, the costs are reimbursable from the Settlement Fund. Any additional Claims Administration Expenses shall be paid out of the Settlement Fund as they become due, subject to the terms of the Premium Tax Settlement Agreement and Preliminary Approval Order.

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

6. Plaintiff Arbuckle Funding LLC shall be paid an incentive award of \$5,000, payable out of the Settlement Fund.

7. This Order shall become effective immediately.

ENTERED this ____ day _____ of ____.

Honorable Cathy Seibel
UNITED STATES DISTRICT JUDGE