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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION**

WILLIAM F. WREN and JOHN
MURPHY, on behalf of themselves and
others similarly situated,

Plaintiffs,

v.

TRANSAMERICA LIFE INSURANCE
COMPANY,

Defendant.

Case No. 5:21-cv-00178-JGB-SP

**PLAINTIFFS' NOTICE OF
MOTION AND UNOPPOSED
MOTION PRELIMINARILY
CERTIFYING SETTLEMENT
CLASS AND APPROVING CLASS
ACTION SETTLEMENT**

Hearing Date: August 3, 2026
Time: 9:00 a.m.
Courtroom 1

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on August 3, 2026, at 9:00 a.m., Plaintiffs
3 William F. Wren and John Murphy will and hereby respectfully move pursuant to
4 Federal Rule of Civil Procedure 23, for an order: (1) Preliminarily certifying the
5 proposed Class for Settlement, and appointing Plaintiffs as class representatives and
6 Susman Godfrey and Bonnett Fairbourn Friedman & Balint as Class Counsel; (2)
7 Preliminarily approving the Settlement and Plan of Allocation; (3) Approving the
8 form and manner of notice, appointing JND Legal Administration as Settlement
9 Administrator, and directing notice to the Class; and (4) Scheduling a final approval
10 hearing.

11 This Motion will be heard in the Courtroom of the Honorable Jesus G. Bernal
12 for the United States District Court in the Central District of California. The Court is
13 located at the United States District Court, 3470 Twelfth Street, Riverside, California
14 92501, Courtroom 1.

15 This Motion is based upon this notice, the concurrently filed memorandum of
16 law, the exhibits and declarations attached thereto, the pleadings and records on file
17 in this action, and such other matters as the Court deems necessary and proper.

18 Transamerica does not oppose this motion. Pursuant to Local Rule 7-3, counsel
19 for the parties met and conferred about this motion on July 3, 2026.

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21 Dated: July 10, 2026

SUSMAN GODFREY L.L.P.

22 By: */s/ Steven G. Sklaver*
23 STEVEN G. SKLAVER (237612)

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