

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

Rita Kohari, John Radolec, and Mohani Jaikaran, individually and as representatives of a class of similarly situated persons, and on behalf of the MetLife 401(k) Plan (f/k/a the Savings and Investment Plan for Employees of Metropolitan Life and Participating Affiliates),

Plaintiffs,

v.

MetLife Group, Inc., Metropolitan Life Insurance Company, the MetLife Group Benefit Plans Investment Advisory Committee, the Employee Benefits Committee of MetLife Group, Inc., and John and Jane Does 1-20,

Defendants.

Case No. 1:21-cv-6146-JHR-KHP

**PLAINTIFFS'  
NOTICE OF MOTION AND MOTION  
FOR ATTORNEYS' FEES AND  
COSTS, ADMINISTRATIVE  
EXPENSES, AND CASE  
CONTRIBUTION AWARDS**

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that on January 9, 2025, 10:00 a.m., before the Honorable Katharine H. Parker, United States Magistrate Judge, in Courtroom 17D, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, Plaintiffs Rita Kohari, John Radolec, and Mohani Jaikaran (“Plaintiffs”) will and hereby do move this Court for An Order awarding: (1) attorneys’ fees to Class Counsel in the amount of \$1,500,000 (one-third of the \$4.5 million Qualified Settlement Fund); (2) reimbursement of \$212,031.12 in litigation costs and \$160,000 in settlement administration expenses; and (3) settlement class representative case contribution awards in the amount of \$15,000 to each of the named Plaintiffs (\$45,000 total).

This motion is made under Federal Rule of Civil Procedure 23(h) and Article 6 of the Parties' Class Action Settlement Agreement, *ECF No. 111-1*, and is based on the accompanying Memorandum of Law and authorities cited therein, the Declaration of Brock J. Specht and exhibits thereto, the previously filed declarations of the Named Plaintiffs, *ECF Nos. 112, 113, 114*, the previously filed declaration of Brock J. Specht, *ECF No. 111*, the Settlement Agreement, and all files, records, and proceedings in this matter.

Pursuant to Article 6 of the Settlement Agreement, Defendants do not take any position with respect to this motion. As of the filing of this motion, there have been no objections to the proposed attorneys' fees and costs, Settlement Administrative Expenses, or Case Contribution Awards.

Dated: November 22, 2024

Respectfully submitted,

**NICHOLS KASTER, PLLP**

By: s/ Brock J. Specht  
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ATTORNEYS FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I hereby certify that on November 22, 2024 a true and correct copy of the foregoing was served by CM/ECF to the parties registered to the Court's CM/ECF system.

Dated: November 22, 2024

/s/ Brock J. Specht  
Brock J. Specht