

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**JUDY HALCOM, HUGH PENSON,  
HAROLD CHERRY, and RICHARD  
LANDINO, Individually and on Behalf of All  
Others Similarly Situated,**

*Plaintiffs,*

**v.**

**GENWORTH LIFE INSURANCE  
COMPANY AND GENWORTH LIFE  
INSURANCE COMPANY OF NEW YORK,**

*Defendants.*

**Civil Action No. 3:21-cv-00019**

**CLASS ACTION**

**JOINT MOTION TO APPROVE SETTLEMENT WITH OBJECTORS**

Pursuant to Fed. R. Civ. Pro. (“FRCP”) 23(e)(5)(B), Plaintiffs Judy Halcom, Hugh Penson, Harold Cherry (through his Estate), and Richard Landino, on behalf of themselves and the Class (collectively, “Plaintiffs”), Defendants Genworth Life Insurance Company and Genworth Life Insurance Company of New York (collectively, “Defendants”), Goldman Scarlato & Penny, P.C., Robbins Geller Rudman & Dowd LLP, Berger Montague P.C., and Phelan Petty P.C. (collectively, “Class Counsel”), Objectors Diane Crone, Terry Crone, Walter Leen, Paul Lubell, Bonnie Fontenot Nielson, and Dennis Nielson (collectively, the “Crone Objectors”), Objectors Allen Pfeffer, Lenora Galitz, and Salia Galitz (collectively, the “Pfeffer Objectors”), and W. Edward Bacon (“Bacon,” Bacon together with the Crone and Pfeffer Objectors, the “Objectors”), and Duncan Law Group, LLC, Cronin & Co., Ltd., and Hirschler Fleischer, P.C. (collectively,

“Objectors’ Counsel”) jointly move for approval of an agreement of settlement reached between Plaintiffs, Class Counsel, Defendants, and Objectors (the “Objectors’ Settlement Agreement”) in the above-captioned action (the “Action”). Together, the Plaintiffs, Defendants, Class Counsel, Objectors, and Objectors’ Counsel shall be referred to in this Motion as the “Parties.”

The grounds and reasons for granting this relief are stated with particularity in the accompanying brief and other supporting papers, which are being filed contemporaneously with this Motion under Local Rule 7(F)(1).

[signatures on next page]

DATED: June 3, 2022

Respectfully submitted,

/s/ Jonathan M. Petty

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**CERTIFICATE OF SERVICE**

I certify that on the 3rd day of June, 2022, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF System, which will send a notification of such filing to all counsel of record.

/s/ Heidi Siegmund

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