

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

ADVANCE TRUST & LIFE ESCROW  
SERVICES, LTA, as securities  
intermediary for LIFE PARTNERS  
POSITION HOLDER TRUST, and  
ALICE CURTIS, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

RELIASTAR LIFE INSURANCE  
COMPANY,

Defendant.

Civ. No.: 0:18-cv-2863-DWF-BRT

**PLAINTIFFS' MOTION FOR APPROVAL OF FORM AND MANNER OF  
CLASS NOTICE**

On March 29, 2022, the Court granted the motion for class certification filed by Plaintiffs Advance Trust & Life Escrow Services, LTA and Alice Curtis. ECF No. 211.

Pursuant to the March 29, 2022 Order and Federal Rule of Civil Procedure 23(c), Class Counsel requests that the Court approve (a) the Class Notices attached as Exhibit 2 (short-form notice) and Exhibit 3 (long-form notice) to the declaration of Jennifer Keough, and (b) the manner of notice as described below and in the accompanying Keough declaration. Plaintiffs have conferred with Defendant ReliaStar Life Insurance Company ("RLIC") pursuant to the March 29 Order and Local Rule 7.1, and RLIC has informed Plaintiffs that it does not oppose the form and manner of class notice proposed in this unopposed motion.

Dated: April 28, 2022

Respectfully submitted,

/s/ Ryan T. Weiss

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*Class Counsel and Attorneys for Plaintiffs  
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and Alice Curtis*

**CERTIFICATE OF CONFERENCE**

All parties agree regarding this joint motion and attached proposed order.

/s/ Ryan T. Weiss  
Ryan T. Weiss