UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

(U.S.A.)

JEFFREY LEONARD, IN HIS CAPACITY AS Civil Action No. 18-cv-04994-AKH TRUSTEE OF THE POPLAWSKI 2008 INSURANCE TRUST; PHYLLIS POPLAWSKI; PBR PARTNERS; BRIGHTON TRUSTEES, LLC, on behalf of and as trustee for COOK STREET MASTER TRUST III; BANK OF UTAH, solely as securities intermediary for So ordered, COOK STREET MASTER TRUST III; PEAK /s/ Alvin K. Hellerstein TRUST COMPANY, AK, on behalf of and as Alvin K. Hellerstein trustee for SUSAN L. CICIORA TRUST and 3/26/21 STEWART WEST INDIES TRUST; and ADVANCE TRUST & LIFE ESCROW SERVICES, LTA, as securities intermediary for LIFE PARTNERS POSITION HOLDER TRUST, on behalf of themselves and all others similarly situated Plaintiffs, VS. JOHN HANCOCK LIFE INSURANCE COMPANY OF NEW YORK and JOHN HANCOCK LIFE INSURANCE COMPANY

MOTION TO FILE UNDER SEAL PORTIONS OF THE SECOND AMENDED <u>COMPLAINT</u>

Defendants.

Plaintiffs file this motion, which concerns redactions contained in Plaintiffs' Second Amended Complaint, pursuant to Rule 4(B)(i) of the Court's Individual Rules. The redactions contained in Plaintiffs' Second Amended Complaint are the same as the redactions contained in Plaintiffs' First Amended Complaint, which the Court previously ordered be maintained under seal. *See* Docket No. 125. Accordingly, Plaintiffs respectfully request that the Court allow the redacted information in Plaintiffs' Second Amended Complaint be filed under seal.

Dated: March 25, 2021

/s/Seth Ard

Seth Ard

Ryan Kirkpatrick

Zachary B. Savage

Ari Ruben

Amy Gregory

SUSMAN GODFREY L.L.P.

1301 Avenue of the Americas, 32nd Floor

New York, NY 10019

Tel.: 212-336-8330

Fax: 212-336-8340

sard@susmangodfrey.com

rkirkpatrick@susmangodfrey.com

zsavage@susmangodfrey.com

aruben@susmangodfrey.com

agregory@susmangodfrey.com

Steven Sklaver

Glenn Bridgman

SUSMAN GODFREY L.L.P.

1900 Avenue of the Stars, Suite 1400

Los Angeles, CA 90067

Tel: 310-789-3100

Fax: 310-789-3150

ssklaver@susmangodfrey.com

gbridgman@susmangodfrey.com

Andres Healy

SUSMAN GODFREY L.L.P.

1201 Third Avenue, Suite 3800

Seattle, WA 98101

ahealy@susmangodfrey.com

Tel.: (206) 516-3880

Fax: (206) 516-3883

ahealy@susmangodfrey.com

Attorneys for Plaintiffs