

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS (BOSTON)

)	
KAREN L. BACCHI, Individually and on)	Civil Action No. 12-cv-11280-DJC
Behalf of all Persons Similarly Situated,)	
)	
Plaintiff,)	
)	
v.)	
)	
MASSACHUSETTS MUTUAL LIFE)	
INSURANCE COMPANY,)	
)	
Defendant.)	
)	

**PLAINTIFF’S MOTION FOR APPROVAL OF ATTORNEYS’ FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS REPRESENTATIVE
INCENTIVE AWARD**

Plaintiff Karen L. Bacchi respectfully submits the following Motion for Approval of Attorneys’ Fees, Reimbursement of Litigation Expenses, and Class Representative Incentive Award (the “Motion”). For the reasons set forth in the Memorandum of Law in Support of Plaintiff’s Motion, the Declarations of Jason B. Adkins, Andrew S. Friedman, and Mark A. Chavez in Support of Plaintiff’s Motion, and the exhibits attached thereto, Plaintiff respectfully requests that the Court enter an Order:

(1) Granting the Motion;

(2) Approving payment of attorneys’ fees and reimbursement of litigation expenses to Class Counsel in the amount of \$9,375,000 for attorneys’ fees and \$1,533,575.85 in unreimbursed litigation expenses, and an incentive award of \$3,000 to Class Plaintiff to be paid from the Class Settlement Amount in accordance with the terms of the *Stipulation And Agreement of Compromise, Settlement And Release of Action* [ECF 235] dated March 13, 2017; and

(3) Granting such other, further, or different relief as the Court deems just and proper.

Finally, Defendant Massachusetts Mutual Life Insurance Company does not oppose the relief sought in this Motion.

Dated: June 19, 2017.

Respectfully submitted,

/s/ Jason B. Adkins

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Attorneys for Plaintiff

LOCAL RULES 7.1(A)(2) and 37.1 CERTIFICATION

I hereby certify that pursuant to Local Rules 7.1(A)(2) and 37.1 that Plaintiff has conferred with opposing counsel on the matters set forth herein and reports that Defendant's counsel has stated that defendant does not oppose the relief sought herein by this Motion.

Dated: June 19, 2017

/s/ Jason B. Adkins
Jason B. Adkins

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on June 19, 2017.

A copy of the foregoing was mailed this 19th day of June, 2017 to the Settlement Administrator at:

Analytics LLC, Settlement Administrator
Bacchi v. Massachusetts Mutual Life Insurance Co.
P.O. Box 2004
Chanhassen, MN 55317-2004

Dated: June 19, 2017

/s/ Jason B. Adkins
Jason B. Adkins