

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

MARTIN SILVERSTEIN,
Plaintiff,

v.

GENWORTH LIFE INSURANCE COMPANY,
Defendant.

Civil No. 3:23-cv-00684 (DJN)

**PLAINTIFF’S MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, Plaintiff Martin Silverstein, individually and on behalf of a class of policy owners proposed to be certified for purposes of settlement (the “Settlement Class” or “Class”), respectfully moves this Court for an order:

1. Certifying the Settlement Class, appointing Plaintiff as Class Representative, and Susman Godfrey L.L.P. as Class Counsel;
2. Preliminarily approving the proposed Settlement, plan of allocation, and the form and manner of notice to the Settlement Class; and
3. Directing notice to the Class under Rule 23(e)(1).

Plaintiff has conferred with Defendant Genworth Life Insurance Company (“GLIC”) pursuant to Local Rule 7.1, and GLIC has informed Plaintiff that it does not oppose the relief sought in this Motion.

Dated: September 13, 2024

Respectfully submitted,

/s/ Kathleen J.L. Holmes

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Attorneys for Plaintiff Martin Silverstein

CERTIFICATE OF SERVICE

I certify that on this 13th day of September 2024, I electronically filed a copy of the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

/s/ Kathleen J.L. Holmes

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