

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

FRED HANEY,  
et al.,

Plaintiffs,

v.

Civil Action No. 3:22-cv-55

GENWORTH LIFE INSURANCE  
CO., et al.,

Defendants.

**ORDER**

For the reasons stated on the record during the final settlement approval hearing on November 17, 2022, it is hereby ORDERED that:

(1) To resolve the objection regarding rate increase letters between preliminary approval of the settlement agreement and the mailing of notice made by Mr. Gary M. Davis, esquire, on behalf of himself and Lorrienne Freedlander (ECF No. 61), the parties shall submit briefs to the Court on the following schedule:

(a) By November 23, 2022, Plaintiffs and Defendants shall submit a supplemental response to Mr. Davis's objection; and

(b) By November 23, 2022, Plaintiffs and Defendants shall file a Statement of Position respecting how many class members received similar letters during the same period and how many class members elected to reduce their benefits; and

(c) Mr. Davis shall email his response to the courtroom deputy and counsel for both parties for filing by December 5, 2022; and

(d) Plaintiffs and Defendants shall file a reply by December 8, 2022; and

(2) Consistent with the notice that was provided to the Court that the Plaintiffs, Defendants, and Objectors from ECF Nos. 48, 53, 56, 69, and 73 have reached a settlement agreement of the objections, by November 30, 2022, the parties shall file a motion for withdrawal of the objections and approval of that agreement; and

(3) By November 30, 2022, the parties shall file an updated Settlement Agreement that reflects the provisions respecting the updated options with the objectors; and

(4) Argument on both matters shall be heard on December 13, 2022, at 10:00 AM. Counsel for the parties shall attend the hearing in-person, but class members, their counsel, and members of the public who wish to attend the hearing remotely may contact the courtroom deputy (804-916-2228), no later than December 12, 2022, at 4:00 PM EST, to receive information about how to access the Zoom conference. Class counsel is directed to ensure that the information to access the hearing remotely is published on the settlement website.

It is further ORDERED that Class Counsel shall ensure that Mr. Davis receives this Order and all briefings pertaining to his objection.

It is so ORDERED.

/s/ REP  
Robert E. Payne  
Senior United States District Judge

Richmond, Virginia  
Date: November 21, 2022