UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

Jennifer Baker and Jean Greenberg, as representatives of a class of similarly situated persons, and on behalf of the Investment-Incentive Plan for John Hancock Employees,

Case No. 1:20-cv-10397-GAO

Plaintiffs,

v.

John Hancock Life Insurance Company (U.S.A.) and the John Hancock US Benefits Committee,

Defendants.

NOTICE OF SETTLEMENT

Plaintiffs Jennifer Baker and Jean Greenberg and Defendants John Hancock Life Insurance Company (U.S.A.) and the John Hancock US Benefits Committee (collectively, the "Parties"), have reached a settlement in principle of the above captioned action on a class-wide basis. The Parties expect to be able to finalize a comprehensive settlement agreement and file a motion for preliminary approval on or before June 1, 2021. In the meantime, the Parties request that all pending proceedings and deadlines continue to be stayed.¹

¹ On February 12, 2021, the Court granted the Parties' joint motion for a 75-day stay pending mediation. *See ECF Nos. 57* (joint motion to stay pending mediation); *58* (granting motion).

Dated: April 21, 2021

Respectfully submitted,

/s/ Kai H. Richter

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CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2021, a true and correct copy of the foregoing *Notice of Settlement* was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Kai H. Richter Kai H. Richter