

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

IN RE GENWORTH FINANCIAL, INC.,
SECURITIES LITIGATION

Civ. A. No. 3:14-cv-00682-JAG

Hon. John A. Gibney, Jr.

CLASS ACTION

**LEAD PLAINTIFFS' MOTION
FOR ENTRY OF CLASS DISTRIBUTION ORDER**

Pursuant to Rule 23 of the Federal Rules of Civil Procedure and Local Civil Rule 7, Lead Plaintiffs Her Majesty the Queen in Right of Alberta and Fresno County Employees' Retirement Association ("Lead Plaintiffs") move this Court for entry of an Order, *inter alia*, approving distribution of the Net Settlement Fund to Authorized Claimants as set forth in the Declaration of Megan M. Peters in Support of Lead Plaintiffs' Motion for Approval of Distribution Plan ("Peters Declaration"), attached hereto as Exhibit 1.¹

This Motion is based on the accompanying Memorandum of Points and Authorities in Support Thereof, the Peters Declaration and exhibits thereto, all pleadings and papers filed herein, arguments of counsel, and any other matters properly before the Court.

Lead Counsel have given notice to Defendants' Counsel of this Motion, and have confirmed that Defendants do not oppose the Motion. Lead Counsel are not aware of any opposition to this Motion and there are no Claims in dispute for the Court's review. The parties agree that the motion may be submitted without oral argument.

Lead Plaintiffs submit herewith a [Proposed] Class Distribution Order for the Court's consideration.

¹ All capitalized terms that are not defined herein are defined in the Stipulation and Agreement of Settlement dated as of April 1, 2016 (ECF No. 196-1).

Dated: May 30, 2017

Respectfully submitted,

/s/ Susan R. Podolsky

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CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2017, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Susan R. Podolsky

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