

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

DAVID B. KARR, individually and on behalf of) others similarly situated,)) Plaintiff,))	Case No. 1916-CV26645 Division 14
vs.))	
KANSAS CITY LIFE INSURANCE) COMPANY)) Defendant.)	

**PLAINTIFF’S MOTION FOR ENTRY OF FINAL JUDGMENT PURSUANT TO JURY
VERDICT IN FAVOR OF THE CERTIFIED CLASS**

Plaintiff David B. Karr on behalf of himself and the certified class of Missouri policyholders (collectively, “Plaintiffs”) hereby moves for the entry of final judgment in favor of Plaintiffs in accordance with the jury’s verdict on December 9, 2022. Plaintiffs respectfully request that the Court’s judgment (1) include the class definition in accordance with Mo. Sup. Ct. R. 52.08(c)(3); (2) include an award of prejudgment interest as required by Mo. Rev. Stat. § 408.020 in the amount of \$13,492,389.41 accruing as of December 21, 2022, and continuing to accrue at the daily amount of no less \$4,698.66 until the Court enters final judgment; (3) include an award of post-judgment interest at the rate of 9% as required by Mo. Rev. Stat. § 408.040.2; (4) provide for an award of attorneys’ fees, expenses, and a service award to Mr. Karr as set forth in Class Counsel’s contemporaneously filed Motion for Attorneys’ Fees, Expenses, and Service Award; (5) approve Plaintiffs’ proposed plan of allocation; and (6) establish a Qualified Settlement Fund to collect and distribute the judgment and appoint Analytics Consulting LLC to administrator the fund. The Court’s judgment should also resolve any post-trial motions by Defendant.

Plaintiffs respectfully submit a proposed form of judgment at Exhibit 1 to their Suggestions in Support of this Motion.

December 21, 2022

Respectfully submitted,

STUEVE SIEGEL HANSON LLP

/s/ Patrick J. Stueve

Patrick J. Stueve MO Bar # 37682
Lindsay Todd Perkins MO Bar # 60004
Ethan M. Lange MO Bar # 67857
David A. Hickey MO Bar # 62222
460 Nichols Road, Suite 200
Kansas City, Missouri 64112
Telephone: 816-714-7100
Facsimile: 816-714-7101
Email: stueve@stuevesiegel.com
Email: perkins@stuevesiegel.com
Email: lange@stuevesiegel.com
Email: hickey@stuevesiegel.com

- And -

John J. Schirger MO Bar # 60583
Matthew W. Lytle MO Bar # 59145
Joseph M. Feierabend MO Bar # 62563
MILLER SCHIRGER, LLC
4520 Main Street, Suite 1570
Kansas City, Missouri 64111
Telephone: 816-561-6500
Facsimile: 816-561-6501
Email: jschirger@millerschirger.com
Email: mlytle@millerschirger.com
Email: jfeierabend@millerschirger.com

COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this December 21, 2022, the foregoing document was filed with the Clerk of the Court using the Missouri e-filing system, which sent notification of such filing to all counsel of record.

/s/ Patrick J. Stueve

Counsel for Plaintiffs