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*Attorneys for Defendant
Hamilton Lane Advisors, L.L.C.*

KEVIN STEINKE, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

AON INVESTMENTS USA, INC., et al.,

Defendants.

:
:
: **PHILADELPHIA COUNTY**
: **COURT OF COMMON PLEAS**
:
: **COMMERCE PROGRAM**
:
: CIVIL TRIAL DIVISION
: JUNE TERM, 2021
: NO.: 210601197
:

**RESPONSE OF DEFENDANT HAMILTON LANE ADVISORS, L.L.C.
TO PLAINTIFFS' MOTION FOR FINAL APPROVAL OF SETTLEMENTS**

Defendant Hamilton Lane Advisors, L.L.C. ("Hamilton Lane"), by and through its counsel, DLA Piper LLP (US), submits this response to Plaintiffs' *Motion for Order Granting Final Approval of [1] Settlement with Hamilton Lane Advisors, L.L.C.; [2] Settlement with Portfolio Advisors LLC; [3] Award of Attorneys' Fees through January 13, 2025; [4] Award of Incentive Fees for Class Representatives; [5] Award of Class Counsel Litigation Costs and Expenses through January 13, 2025; [6] Award of Administration Expenses through July 31, 2025 and Creation of Reserve for Future Administration Expenses; and, [7] Plan for Distribution of Net Settlement Fund to Class Members* (Control No. 25084476) (hereinafter, "the Motion").

Hamilton Lane writes separately to join Plaintiffs' request that the Court grant final approval of the settlement between the Plaintiffs and Hamilton Lane following the September 11,

2025, final approval hearing.¹ The settlement between Hamilton Lane and Plaintiffs is fair, reasonable, and adequate; represents the culmination of years of hotly-contested litigation and arms-length negotiations; appropriately accounts for the risk of continued litigation between the class and Hamilton Lane; and, in light of the absence of *any* objections and a de minimis number of opt-outs (only five), appears to have the approval of the class members themselves. For these reasons, Hamilton Lane joins Plaintiffs' request that the Court grant final approval of the settlement between Hamilton Lane and the Plaintiffs following the September 11, 2025, fairness hearing.

Date: September 9, 2025

Respectfully submitted,

/s/ Brian M. Robinson

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Attorneys for Defendant

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¹ Hamilton Lane takes no position on the other aspects of the Motion, including the reasonableness of Plaintiffs' settlement with co-Defendant Portfolio Advisors LLC and the request for court approval to make various payments to class counsel, class representatives, the settlement administrator, and class members.

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provision of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: DLA PIPER LLP (US)

/s/ Brian M. Robinson

Brian M. Robinson

PA Bar No. 204364

Attorneys for Defendant

Hamilton Lane Advisors, L.L.C.

CERTIFICATE OF SERVICE

I, Brian M. Robinson, hereby certify that on the 9th day of September, 2025, I caused a true and correct copy of the foregoing documents to be electronically filed using the Court's electronic filing system, and that the document is available for downloading and viewing there to all counsel of record.

/s/ Brian M. Robinson

Brian M. Robinson