BEFORE THE INSURANCE COMMISSIONER OF THE STATE OF IOWA

In the matter of the Application of Transamerica Life Insurance Company (TLIC) for Approval of Its Plan of Division	(Iowa Code Chapter 521I)

BEFORE THE INSURANCE COMMISSIONER AND THE ATTORNEY GENERAL OF THE STATE OF IOWA

In the matter of the Application of Transamerica Life Insurance Company (TLIC) for Approval of the Merger of Newly Formed Company with SCOR Global Life USA Reinsurance Company	(Iowa Code Chapter 521)

MOTION FOR SUMMARY JUDGMENT OF INTERVENOR JOHN HANCOCK

Date: July 20, 2026

FROHMAN LAW OFFICE LLC

Ann Frohman
1350 Aldrich Rd.
Lincoln, NE 68510

MINTZ, LEVIN, COHN, FERRIS, GLOVSKY & POPEO, P.C.

Suman Chakraborty (*pro hac vice*)
Kristen White (*pro hac vice*)
Kerime S. Akoglu (*pro hac vice*)
Matt Phillips (*pro hac vice*)
919 Third Avenue
New York, New York 10022

KOOPMANS LAW GROUP LLC

Ryan Koopmans
500 East Court Ave., Suite 420
Des Moines, IA 50309

Counsel for Intervenor John Hancock

COMES NOW, Intervenors John Hancock Life Insurance Company (U.S.A.) and its affiliate The Manufacturers Life Insurance Company (Bermuda Branch) (collectively, "John Hancock") and move for summary judgment pursuant to Iowa Code Section 191—3.15(17A) and Iowa Rules of Civil Procedure 1.981 through 1.983, as incorporated by 191—2.2(17A.22) (the "Motion"). In support of the Motion, John Hancock states:

1. John Hancock is an Intervenor in the above-captioned proceedings concerning Transamerica Life Insurance Company's ("TLIC") proposed Plan of Division (the "Proposed Plan") under Iowa Code Chapter 521I and the proposed merger of the newly formed entity with SCOR Global Life USA Reinsurance Company ("SGLUSA") under Iowa Code Chapter 521.

2. This Motion presents the threshold legal question of whether Chapter 521I authorizes TLIC's attempt to accomplish a statutory novation of assumed reinsurance treaties issued by TLIC to cedents like John Hancock.

3. John Hancock has standing to bring this Motion as an intervening party in the above-captioned proceeding.

4. John Hancock is entitled to summary judgment as a matter of law because Chapter 521I does not authorize a statutory novation of assumed reinsurance treaties.

5. Summary judgment is appropriate because the question of whether Chapter 521I authorizes approval of the Proposed Plan is a question of statutory interpretation and law, which is properly the subject of a summary judgment motion.

6. In Support of the Motion, John Hancock has filed a Memorandum of Law, along with a Statement of Material Facts and accompanying affidavit attaching relevant exhibits.

Date: July 20, 2026

Respectfully submitted,

FROHMAN LAW OFFICE LLC

By: /s/ Ann Frohman
Ann Frohman (Iowa No. AT0014062)
1350 Aldrich Rd.
Lincoln, NE 68510
ann@frohmanlaw.com

KOOPMANS LAW GROUP LLC

Ryan Koopmans
500 East Court Ave., Suite 420
Des Moines, IA 50309
ryan@koopmangroup.com

MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY & POPEO, P.C.

Suman Chakraborty (*pro hac vice*)
Kristen White (*pro hac vice*)
Kerime S. Akoglu (*pro hac vice*)
Matt Phillips (*pro hac vice*)
919 Third Avenue
New York, New York 10022
schakraborty@mintz.com
kdwhite@mintz.com
ksakoglu@mintz.com
mphillips@mintz.com

Counsel for Intervenor John Hancock