

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

ARKANSAS TEACHER RETIREMENT SYSTEM,  
on behalf of itself and all others similarly situated,

Plaintiff,

v.

STATE STREET BANK AND TRUST COMPANY,

Defendant.

No. 11-cv-10230 MLW

ARNOLD HENRIQUEZ, MICHAEL T. COHN, WILLIAM R.  
TAYLOR, RICHARD A. SUTHERLAND, and those similarly  
situated,

Plaintiffs,

v.

STATE STREET BANK AND TRUST COMPANY,

Defendant.

No. 11-cv-12049 MLW

THE ANDOVER COMPANIES EMPLOYEE SAVINGS AND  
PROFIT SHARING PLAN, on behalf of itself, and JAMES  
PEHOUSHEK-STANGELAND, and all others similarly  
situated,

Plaintiffs,

v.

STATE STREET BANK AND TRUST COMPANY,

Defendant.

No. 12-cv-11698 MLW

**LABATON SUCHAROW LLP'S SUBMISSION OF DECLARATIONS OF  
ERIC J. BELFI AND CHRISTOPHER J. KELLER**

Labaton Sucharow LLP respectfully submits, as Exhibits 1 and 2 hereto, the Declarations of Eric J. Belfi and Christopher J. Keller in further response to Paragraph 2 of the Court's October 16, 2018 Order, ECF 494.

Dated: November 30, 2018

Respectfully submitted,

By: /s/ Joan A. Lukey

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*Counsel for Labaton Sucharow LLP*

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to all counsel of record on November 30, 2018.

/s/ Joan A. Lukey

Joan A. Lukey

# **Exhibit 1**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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ARKANSAS TEACHER RETIREMENT SYSTEM, )  
on behalf of itself and all others similarly situated )  
 ) No. 11-cv-10230 MLW  
Plaintiffs, )  
 )  
v. )  
 )  
STATE STREET BANK AND TRUST COMPANY, )  
 )  
Defendant )  
 )  

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ARNOLD HENRIQUEZ, MICHAEL T. COHN, )  
WILLIAM R. TAYLOR, RICHARD A. SUTHERLAND )  
and those similarly situated, ) No. 11-cv-12049 MLW  
 )  
v. )  
 )  
STATE STREET BANK AND TRUST COMPANY, )  
STATE STREET GLOBAL MARKETS, LLC and )  
DOES 1-20 )  
 )  
Defendants. )  
 )  

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THE ANDOVER COMPANIES EMPLOYEES SAVINGS )  
AND PROFIT SHARING PLAN, on behalf of itself and )  
JAMES PEHOUSHEK-STRANGELAND, and all others )  
similarly situated, )  
 ) No. 11-cv-11698 MLW  
v. )  
 )  
STATE STREET BANK AND TRUST COMPANY, )  
 )  
Defendant. )  
 )  

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**DECLARATION OF ERIC J. BELFI**

I, ERIC J. BELFI, declare as follows:

1. I am a partner of Labaton Sucharow LLP (“Labaton” or “the Firm”). I submit this Declaration in response to the Order of the Court dated October 16, 2018, as a supplement to paragraph 4 of my declaration of October 25, 2018.

2. As referenced in the Special Master’s Report at p. 90, Chargois acted as local counsel in a case that settled in 2008, entitled *Bristol Retirement System v. HCC Insurance Holdings Inc.*, No. 07-cv-0801 (S.D. Tex.). Chargois functioned as traditional local counsel in this Texas lawsuit, and was paid commensurate with the work that he and his firm performed. Neither he nor his firm referred the client to Labaton. Reference to this closed case was inadvertently omitted from my earlier declaration.

3. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 28<sup>th</sup> day of November, 2018.

/s/ Eric J. Belfi  
Eric J. Belfi

# **Exhibit 2**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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ARKANSAS TEACHER RETIREMENT SYSTEM,	)
on behalf of itself and all others similarly situated	)
	) No. 11-cv-10230 MLW
Plaintiffs,	)
	)
v.	)
	)
STATE STREET BANK AND TRUST COMPANY,	)
	)
Defendant	)
<hr/>	
ARNOLD HENRIQUEZ, MICHAEL T. COHN,	)
WILLIAM R. TAYLOR, RICHARD A. SUTHERLAND	)
and those similarly situated,	) No. 11-cv-12049 MLW
	)
v.	)
	)
STATE STREET BANK AND TRUST COMPANY,	)
STATE STREET GLOBAL MARKETS, LLC and	)
DOES 1-20	)
	)
Defendants.	)
<hr/>	
THE ANDOVER COMPANIES EMPLOYEES SAVINGS	)
AND PROFIT SHARING PLAN, on behalf of itself and	)
JAMES PEHOUSHEK-STRANGELAND, and all others	)
similarly situated,	)
	) No. 11-cv-11698 MLW
v.	)
	)
STATE STREET BANK AND TRUST COMPANY,	)
	)
Defendant.	)
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**DECLARATION OF CHRISTOPHER J. KELLER**

I, CHRISTOPHER J. KELLER, declare as follows:

1. I am a partner of Labaton Sucharow LLP (“Labaton” or “the Firm”). I submit this Declaration in response to the Order of the Court dated October 16, 2018, as a supplement to paragraph 3 of my declaration of October 25, 2018.

2. As referenced in the Special Master’s Report at p. 90, and in my deposition testimony, Chargois acted as local counsel in a case that settled in 2008, entitled *Bristol Retirement System v. HCC Insurance Holdings Inc.*, No. 07-cv-0801 (S.D. Tex.). Chargois functioned as traditional local counsel in this Texas lawsuit, and was paid commensurate with the work that he and his firm performed. Neither he nor his firm referred the client to Labaton. Reference to this closed case was inadvertently omitted from my earlier declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 28<sup>th</sup> day of November, 2018.

s/ Christopher J. Keller  
Christopher J. Keller