

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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

Plaintiffs,

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,  
STATE STREET GLOBAL MARKETS, LLC and DOES 1-20,

Defendants.

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

**THE HAMILTON LINCOLN LAW INSTITUTE'S CENTER FOR CLASS  
ACTION FAIRNESS'S RESPONSE TO THE PROPOSED FORM OF CLASS NOTICE**

Pursuant to the Court's Memorandum and Order (Dkt. 619), the Hamilton Lincoln Law Institute's Center for Class Action Fairness ("CCAF") provides the following few minor suggestions with respect to the proposed class notice (Dkt. 619-1).

1. On page 2 of the notice, CCAF recommends slightly amending the sixth paragraph (regarding CCAF) as follows:

The Court has stated that it may make an additional fee award to the Hamilton Lincoln Law Institute's Center for Class Action Fairness ("CCAF"), which **has** participated ~~helpfully~~ in proceedings concerning the fee award **since 2017 as an "*amicus curiae*" (Latin for "friend of the court.") Among other things, CCAF maintained that Plaintiffs' Counsel should be awarded a total fee less the \$75,000,000 initially awarded. In its orders, the Court has found CCAF's participation "very helpful" but t**The Court has not yet decided whether an award will be made to CCAF and, if so, whether it will be made from funds that would otherwise be distributed to the class. However, any award to CCAF will not materially reduce the additional more than \$14,000,000 the class will receive as a result of the Court's February 27, 2020 decision.

These minor changes will better inform class members of the history of CCAF's participation in the proceedings, and will also enhance neutrality.

2. In the second paragraph of page 1, CCAF recommends introducing AB Data's role as the settlement administrator, such that the final sentence reads as follows: "If you wish to receive a hard copy of this decision, please contact **the settlement administrator** AB Data at 1-877-240-3540, and it will be sent to you at no cost."

3. In the last paragraph on page 2, CCAF recommends using the term "Plaintiffs' Counsel" instead of "Class Counsel" for the sake of consistency.

4. In the first full paragraph on page 3, CCAF recommends inserting a sentence as follows:

Plaintiffs' Counsel will use their best efforts to implement a three-step distribution process for the payment of settlement funds. **All distributions will be made via check.** A tiered process will expedite the distribution to the class of funds that are not potentially in dispute, while fee awards are finalized by the Court.

Respectfully submitted,

Dated: July 10, 2020

/s/ M. Frank Bednarz  
M. Frank Bednarz (BBO No. 676742)  
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*Attorneys for Amicus Curiae  
Hamilton Lincoln Law Institute  
Center for Class Action Fairness*

**CERTIFICATE OF SERVICE**

I certify that on July 10, 2020, I served a copy of the forgoing on all counsel of record by filing a copy via the ECF system.

Dated: July 10, 2020

/s/ M. Frank Bednarz

M. Frank Bednarz