

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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.)
)

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

THE ANDOVER COMPANIES EMPLOYEE SAVINGS)
AND PROFIT SHARING PLAN, on behalf of itself, and) No. 12-cv-11698 MLW
JAMES PEHOUSHEK-STANGELAND, and all others)
similarly situated,)
)
Plaintiffs,)
)
v.)
)
STATE STREET BANK AND TRUST COMPANY,)
)
Defendant.)
)

**PLAINTIFFS' MOTION FOR AUTHORIZATION TO DISTRIBUTE
TO ELIGIBLE ERISA AND PUBLIC & OTHER CLASS MEMBERS**

Plaintiffs, by and through the undersigned counsel, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, respectfully move this Court for an Order authorizing the distribution of proceeds from the Settlement in the above-captioned actions to eligible Settlement Class Members that are that are ERISA Plans, Group Trusts, or Class Members that are non-ERISA public pension funds, private entities, and other customers (“Public & Other”).

Defendant State Street Bank and Trust Company, through its counsel, has indicated that it assents to the relief sought in this motion.

As grounds for this motion, Plaintiffs rely on the accompanying supporting Memorandum of Law; the accompanying supporting Declaration of Eric J. Miller on Behalf of A.B. Data, Ltd. in Support of Motion for Authorization to Distribute to Eligible ERISA and Public & Other Class Members, with exhibits thereto; and all other prior papers and proceedings herein.

WHEREFORE, and for the reasons discussed more fully in the accompanying supporting Memorandum of Law, Plaintiffs respectfully seek the relief requested on the submitted motion papers. A proposed Order is submitted herewith.

Dated: September 1, 2020

Respectfully submitted,

LABATON SUCHAROW LLP

By: /s/ David J. Goldsmith
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*Lead Counsel for Plaintiff
Arkansas Teacher Retirement
System and the Settlement Class*

Certificate of Compliance with Local Rule 7.1(a)(2)

I certify pursuant to Local Rule 7.1(a)(2) that my partner Nicole M. Zeiss and I conferred with counsel for Defendant State Street Bank and Trust Company (“SSBT”) on August 31, 2020 and today concerning the relief sought in the foregoing motion. Counsel confirmed that SSBT does not oppose the relief sought in the motion.

We also conferred with other Plaintiffs’ Counsel about the motion. Counsel at Thornton Law Firm LLP and Keller Rohrback LLP do not oppose the relief sought in the motion. No other counsel responded.

/s/ David J. Goldsmith

David J. Goldsmith

Certificate of Service

I certify that on September 1, 2020, I caused the (1) foregoing Plaintiffs' Motion for Authorization to Distribute to Eligible ERISA and Public & Other Class Members; (2) accompanying Memorandum of Law; and (3) accompanying Declaration of Eric J. Miller on Behalf of A.B. Data, Ltd. in Support of Motion for Authorization to Distribute to Eligible ERISA and Public & Other Class Members, with exhibits; to be filed through the ECF system in the above-captioned actions, and accordingly to be served electronically upon all registered participants identified on the Notices of Electronic Filing.

/s/ David J. Goldsmith
David J. Goldsmith