

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT

RICHARD GOLDSTEIN, *et al.*,  
Plaintiffs,

v.

Civil Action No. 98-2330-BLS1  
(Judge Hinkle)

SAVINGS BANK LIFE INSURANCE  
COMPANY OF MASSACHUSETTS, *et al.*,  
Defendants.

**JOINT MOTION OF THE PARTIES FOR AN ORDER GRANTING FINAL APPROVAL OF SETTLEMENT, AND DISMISSING PLAINTIFFS' CLAIMS WITH PREJUDICE**

The Plaintiffs and the Defendant Savings Bank Life Insurance Company of Massachusetts ("SBLI") respectfully move for entry of an order granting final approval of settlement, and dismissing plaintiffs' claims with prejudice. In support of this motion, the Parties state as follows:

1. This litigation filed in 1998 relates to SBLI's payment of dividends to policyholders. The Parties agreed to settle this litigation by entering a Stipulated Settlement Agreement dated December 29, 2009 ("the Stipulation").

2. The Parties believe the Settlement is fair, reasonable and adequate. It was reached after lengthy, intensive, arms-length negotiations between counsel and only after aggressive litigation until two business days before trial.

3. Final approval of the Settlement is appropriate for the reasons set forth in the Stipulation and in Plaintiffs' and SBLI's memoranda in support of this motion. Without

*5/20/10. allowd after hearing for the reasons set forth in court today. Hinkle*

*Notice sent: 6/20/10 (FR)  
D.P.K - AKLZ  
J.A. - DR-6.D  
J.P.Z - K.A.H  
D.M.S - B.D.P.T.J  
T.F.M - K.H  
J.J.G - K.W.P  
S.M.C - G.T.L.P  
R.A.J - C.L.M  
D.E.B - L.B.C  
R.J.V - A.C.P*