

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT

RICHARD GOLDSTEIN, PETER HALE)	
AND BARBARA J. SULLIVAN, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 98-2330-BLS1
)	(Judge Hinkle)
SAVINGS BANK LIFE INSURANCE)	
COMPANY OF MASSACHUSETTS,)	
AND THE MASSACHUSETTS)	
COMMISSIONER OF INSURANCE,)	
)	
Defendants.)	

**PLAINTIFFS' MOTION FOR AWARD OF
ATTORNEYS' FEES, REIMBURSEMENT OF
EXPENSES AND CLASS REPRESENTATIVE AWARDS**

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Attorneys for Plaintiffs

DATED: April 20, 2010

By way of this Motion, plaintiffs respectfully requests that this Honorable Court award plaintiffs their attorneys' fees, reimbursement of expenses and Class Representative awards. In support of this Motion, plaintiffs refer this Court to their accompanying *Memorandum In Support of Their Motion For Award of Attorneys' Fees, Reimbursement of Expenses And Class Representative Awards*, which attaches the declarations of attorneys Jason B. Adkins, John Peter Zavez, Norman Berman, Daniel E. Bacine, and Brendan Bridgeland.

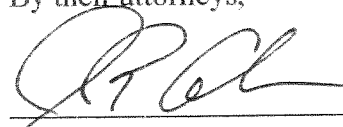
WHEREFORE, based on the foregoing and for the reasons set forth in plaintiffs' Memorandum and the supporting declarations attached thereto, plaintiffs' lead Class counsel respectfully requests that this Motion be allowed and that plaintiffs be awarded attorneys' fees in the amount of \$7.5 million (\$7,500,000), expenses in the amount of \$456,658.41 and Class Representative Incentive Awards in the amount of \$7,500 for each of the three Class Representatives (totaling an additional \$22,500).

DATED: April 20, 2010

Respectfully submitted,

Richard Goldstein, et al.

By their attorneys,



ADKINS, KELSTON & ZAVEZ, P.C.

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by mail (by hand) on this date 4/20/10

+ leg mail
on 4/20/10



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