

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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

Plaintiff,

No. 11-cv-10230-MLW

vs.

STATE STREET BANK AND TRUST COMPANY,

Defendant.

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

Plaintiffs,

No. 11-cv-12049-MLW

vs.

STATE STREET BANK AND TRUST COMPANY,

Defendant.

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

Plaintiffs,

No. 12-cv-11698-MLW

vs.

STATE STREET BANK AND TRUST COMPANY,

Defendant.

**JOINT MOTION TO EXTEND THE DEADLINE FOR FILING  
THE PROPOSED PARTIAL RESOLUTION  
OF ISSUES FOR THE COURT'S CONSIDERATION**

*Allowed. The Master shall, by October 9, 2018,  
file a further report.  
WCV, D.J. Oct. 3, 2018*

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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

Plaintiff,

No. 11-cv-10230-MLW

vs.

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,

Plaintiffs,

No. 11-cv-12049-MLW

vs.

STATE STREET BANK AND TRUST COMPANY,  
  
Defendant.

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

Plaintiffs,

No. 12-cv-11698-MLW

vs.

STATE STREET BANK AND TRUST COMPANY,  
  
Defendant.

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SPECIAL MASTER'S MOTION TO APPEAR IN COURT AT OCTOBER 15, 2018  
HEARING

ALLOWED  
Weth D.J  
October 3, 2018

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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

Plaintiff,

v.

STATE STREET BANK AND TRUST COMPANY,

Defendant.

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No. 11-cv-10230 MLW

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

Plaintiff,

v.

STATE STREET BANK AND TRUST COMPANY, STATE  
STREET GLOBAL MARKETS, LLC and DOES 1-20,

Defendants.

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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,

Plaintiff,

v.

STATE STREET BANK AND TRUST COMPANY,

Defendant.

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No. 12-cv-11698 MLW

**MOTION FOR EXTENSION OF TIME TO OBJECT TO SHARING IN  
ADDITIONAL PROPOSED PAYMENT TO SPECIAL MASTER**

Lieff Cabraser Heimann & Bernstein LLP (“Lieff Cabraser”) and Thornton Law Firm LLP (“Thornton”) respectfully move for a brief extension of time to file their objections to sharing responsibility, along with Labaton Sucharow LLP, for \$750,000 in proposed additional payments to the Special Master. As grounds for this motion, Lieff Cabraser and Thornton state the following:

1. In its Order dated September 21, 2018 [ECF No. 470] (the “Sept. 21 Order”), the Court stated that it was giving Lieff Cabraser and Thornton “an opportunity to amplify the reasons for their objections [to sharing in the \$750,000 proposed payment] after the terms of the Master’s proposal concerning a possible agreed resolution of issues relating to Labaton is disclosed.”

2. The Sept. 21 Order accordingly set a due date of October 2 for the terms of the Master’s proposal to be disclosed, and a due date of October 9 for Lieff Cabraser and Thornton to file any additional reasons for objecting to sharing in the proposed payment to the Special Master.

3. By Order dated October 3, 2018 [ECF No. 480], the Court allowed an extension of time, to October 9, 2018, for the Special Master to file a further report, which may include the terms of the Special Master’s proposal. At present, therefore, this timing would allow little or no time for Lieff Cabraser and Thornton to properly review any proposal before having to file any objections to sharing in the proposed payment to the Special Master.

WHEREFORE, for the reasons set forth herein, Lieff Cabraser and Thornton respectfully request a two-day extension, to October 11, 2018, to filing any objections to their sharing in responsibility for the Special Master’s \$750,000 proposed payment.

Dated: October 5, 2018

Respectfully submitted,

By: /s/ Richard M. Heimann

Richard M. Heimann (*pro hac vice*)  
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*Attorney for Lief Cabraser Heimann  
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By: /s/ Brian T. Kelly

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*Attorney for Thornton Law Firm LLP*

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

I caused counsel for the other parties in this case to be contacted in order to confer regarding the substance of this motion. Based on counsel's replies, no parties oppose this motion.

/s/ Richard M. Heimann

Richard M. Heimann

**CERTIFICATE OF SERVICE**

I hereby certify that on October 5, 2018, I caused a true and correct copy of the above document to be served via ECF on counsel for all parties and counsel for the Special Master.

/s/ Richard M. Heimann  
Richard M. Heimann