IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

GENE R. ROMERO, et al.,

: CIVIL ACTION

Plaintiffs,

NO. 01-3894-MAK

v.

CONSOLIDATED WITH: NO. 01-6764 (Romero II)

NO. 03-6872 (Romero III)

NO: 15-1049 (Abell)

ALLSTATE INSURANCE COMPANY,

NO. 15-1049 (Abell) NO. 15-3047 (Anzivine)

et al.,

Defendants

NOTICE OF VOLUNTARY DISMISSAL OF THE CLAIMS OF ROMERO AND ABELL SETTLING PLAINTIFFS PURSUANT TO LOCAL RULE 41.1(b)

In response to the Court's May 15, 2018 Order (Dkt. No. 1376, at ¶ 2), pursuant to Local Rule 41.1(b), Plaintiffs, by and through their undersigned counsel, hereby notify the Court that each of the *Romero/Abell* Plaintiffs identified in the attached Exhibit A has reached an agreement in principle to settle with Defendants Allstate Insurance Company, The Allstate Corporation, The Agents Pension Plan, and the Administrative Committee (collectively, the "Allstate Defendants"), and Defendant Edward M. Liddy, and that the parties are in the process of finalizing each agreement for execution. Although none of the Plaintiffs identified in Exhibit A has been paid yet pursuant to the parties' agreement to settle, as required by the Court's May 15, 2018 Order, Plaintiffs submit this notice for the Court to enter an order voluntarily dismissing the claims of these settling Plaintiffs with prejudice, without costs, pursuant to the agreement of

counsel and Local Rule 41.1(b). The claims of the remaining Plaintiffs, including the remaining *Romero/Abell* Plaintiffs not identified in Exhibit A,¹ are not affected by this Notice.

Respectfully submitted,

/s/ Coleen M. Meehan

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¹ Romero I/Abell Plaintiff Rudolph McClinon, who had agreed with Defendants to settle his claims, has recently died. Counsel is in the process of preparing a motion for substitution of the appropriate party. His claims should not be dismissed until he is properly substituted. In addition, Romero I/Abell Plaintiff "Sherry Earl," who was substituted last year for her deceased husband and had agreed to a settlement as well, has recently notified counsel that her legal name is Farris Sharon Garner. To properly process settlement, her name will need to be corrected. Accordingly, her claims should not be dismissed yet.

CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2018, a true and correct copy of the foregoing Notice of Dismissal was served via ECF and electronic email on all counsel of record.

Date: May 30, 2018 /s/ Coleen M. Meehan