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

GENE R. ROMERO, et al.,	•	
Plaintiffs,	:	CIVIL ACTION NO. 01-3894-MAK
v.	•	CONSOLIDATED WITH: NO. 01-6764 (Romero II) NO. 03-6872 (Romero III)
ALLSTATE INSURANCE COMPANY,	•	NO: 15-1049 (Abell) NO: 15-3047 (Anzivine)
et al.,	:	
Defendants	:	

NOTICE OF VOLUNTARY DISMISSAL OF THE CLAIMS OF *ROMERO* AND <u>ABELL SETTLING PLAINTIFFS PURSUANT TO LOCAL RULE 41.1(b)</u>

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 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 preparing and executing final settlement agreements. Although none of the Plaintiffs identified in Exhibit A has been paid yet pursuant to the parties' agreement in principle to settle, Plaintiffs submit this notice in accordance with the Court's August 13, 2018 Order (Dkt. No. 1507, at ¶ 2) to allow 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). None of the other Plaintiffs' remaining claims is affected by this Notice. Dated: August 17, 2018

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Respectfully submitted,

/s/ Coleen M. Meehan

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CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2018, a true and correct copy of the foregoing Notice of Voluntary Dismissal of the Claims of *Romero* and *Abell* Settling Plaintiffs Pursuant to Local Rule 41.1(b) was served via ECF and electronic email on all counsel of record.

Date: August 17, 2018

/s/ Coleen M. Meehan