

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

GENE R. ROMERO, <i>et al.</i> ,	:	
	:	
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)
<i>et al.</i> ,	:	
	:	
Defendants	:	

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

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 final settlement agreements. Although none of the Plaintiffs identified in Exhibit A has executed a written settlement agreement or received payment yet pursuant to the parties’ agreement in principle to settle, Plaintiffs submit this notice in response to the Court’s request and 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 claims of the remaining *Romero* Plaintiff, Joseph Benoit, is affected by this Notice.

Dated: September 20, 2018

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on September 20, 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: September 20, 2018

/s/ Coleen M. Meehan