

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

OSHONYA SPENCER,)
CHARLES STRICKLAND and)
DOUGLAS MCDUFFIE, on behalf of)
themselves and all others similarly situated,)
)
Plaintiffs,)

v.)

No. 3:03CV1681 (JCH)

THE HARTFORD FINANCIAL SERVICES)
GROUP, INC., HARTFORD LIFE, INC.,)
HARTFORD LIFE INSURANCE)
COMPANY, HARTFORD ACCIDENT)
AND INDEMNITY COMPANY,)
HARTFORD CASUALTY INSURANCE)
COMPANY, HARTFORD INSURANCE)
COMPANY OF THE MIDWEST and)
HARTFORD FIRE INSURANCE COMPANY,)
)
Defendants.)

**NAMED PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Named Plaintiffs move the Court for preliminary approval of the Settlement on the terms and conditions set forth in the Stipulation of Settlement Agreement and Release (“Settlement” or “Settlement Agreement”, submitted herewith) and entry of the [Proposed] Order Preliminarily Approving Settlement, Authorizing Notice to the Class and Setting Fairness Hearing which is attached as Exhibit “A” to the Settlement Agreement (and also is being submitted separately herewith). The Settlement creates a Settlement Fund of \$72.5 million.

The Settlement is an excellent result for Settlement Class Members. As outlined in the Memorandum of Law in Support submitted herewith, preliminary approval is warranted because:

(a) The notice program provided for in the Settlement Agreement meets all of the requirements of Rule 23 of the Federal Rules of Civil Procedure, is the best practicable notice under the circumstances and is reasonable calculated to reach all Settlement Class Members.

(b) The Settlement is “sufficiently fair, reasonable and adequate to justify notice those affected and an opportunity to be heard”, the legal standard for preliminary approval of a class action settlement. *See In re NASDAQ Market-Makers Antitrust Litig.*, 176 F.R.D. 99, 102 (S.D.N.Y. 1997) (citations omitted).

(c) The Settlement is the result of extensive arm’s length negotiations by experienced complex commercial and class action counsel with the assistance of a well-respected and experienced mediator.

WHEREFORE, Named Plaintiffs respectfully request that the Court grant the motion and enter the [Proposed] Order Preliminarily Approving Settlement, Authorizing Notice to the Class and Setting Fairness Hearing, and grant such other and further relief as the Court deems appropriate.

Dated: June 3, 2010

/s/ David S. Golub

David S. Golub, Esq. (ct00145)
Jonathan M. Levine, Esq. (ct07584)
SILVER GOLUB & TEITELL LLP
184 Atlantic Street, P.O. Box 389
Stamford, CT 06904
(203) 325-4491

Peter R. Kahana, Esq. (phv0784)
Steven L. Bloch, Esq. (phv0786)
BERGER & MONTAGUE, P.C.
1622 Locust Street
Philadelphia, PA 19103
(215) 875-3000

Carl S. Kravitz, Esq. (phv01826)
Caroline E. Reynolds, Esq. (phv3807)
ZUCKERMAN SPAEDER LLP
1800 M Street, N.W., Suite 1000
Washington, D.C. 20036
(202) 778-1800

Richard B. Risk, Jr., Esq.
RISK LAW FIRM
3417 East 76th Street
Tulsa, OK 74136
(918) 494-8025

*Attorneys for Named Plaintiffs
and the Settlement Class*