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**UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII**

STEPHEN G. AQUILINA and LUCINA J.
AQUILINA, Individually and on Behalf of All
Others Similarly Situated; and DONNA J.
CORRIGAN and TODD L. CORRIGAN,
Individually and on Behalf of All Others Similarly
Situated,

Plaintiffs,

vs.

CERTAIN UNDERWRITERS AT LLOYD'S
LONDON; LLOYD'S SYNDICATE #2003;
LLOYD'S SYNDICATE #318; LLOYD'S
SYNDICATE #4020; LLOYD'S SYNDICATE
#2121; LLOYD'S SYNDICATE #2007; LLOYD'S
SYNDICATE #1183; LLOYD'S SYNDICATE
#1729; LLOYD'S SYNDICATE #510; BORISOFF
INSURANCE SERVICES, INC. d/b/a MONARCH
E&S INSURANCE SERVICES; SPECIALTY
PROGRAM GROUP, LLC d/b/a SPG INSURANCE
SOLUTIONS, LLC; ALOHA INSURANCE
SERVICES, INC.; ILIKEA LLC d/b/a MOA
INSURANCE SERVICES HAWAII; and DOES 1-
100,

Defendants.

No. 1:18-cv-00496-ACK-KJM

**PLAINTIFFS' NOTICE OF
UNOPPOSED MOTION
FOR PRELIMINARY
APPROVAL OF
SETTLEMENT
AGREEMENT**

Trial Judge: Alan C. Kay
Hearing Date: July 22, 2021
Trial Date: February 1, 2022

PLEASE TAKE NOTICE that Plaintiffs Stephen G. Aquilina and Lucina J. Aquilina (the “Aquilina Plaintiffs”) and Plaintiffs Donna J. Corrigan and Todd L. Corrigan (the “Corrigan Plaintiffs”) (collectively, “Plaintiffs”) will, and hereby do, move the Court pursuant to Fed. R. Civ. P. 23(e) for an order preliminarily approving the proposed settlement with Lloyd’s Syndicates 2003, 318, 4020, 2121, 2007, 1183, 1729, and 510 (collectively, “Underwriters”), Borisoff Insurance Services, Inc. d/b/a Monarch E&S Insurance Services, Specialty Program Group, LLC d/b/a SPG Insurance Solutions, LLC (collectively, “Monarch”), Aloha Insurance Services, Inc. (“Aloha”), and Ilikea LLC d/b/a Moa Insurance Services Hawaii (“Moa”) (and together with Aloha, Monarch, and Underwriters, “Defendants”). Specifically, Plaintiffs respectfully request that the Court enter an order: (1) preliminarily approving the proposed Settlement, including the Distribution Plan; (2) approving the proposed Notice Program as providing the best notice that is practicable under the circumstances; (3) certifying the proposed Settlement Class; (4) appointing Plaintiffs as class representatives; (5) appointing Joseph P. Guglielmo of Scott+Scott Attorneys at Law LLP, E. Kirk Wood of Wood Law Firm, LLC, and Gregory W. Kugle of Damon Key Leong Kupchak Hastert, a Law Corporation, as Class Counsel; (6) appointing RG/2 Claims Administration, LLC (“RG/2”) as the Settlement Administrator; (7) staying this Litigation pending Final Approval; and (8) scheduling a Final Approval Hearing.

Submitted herewith in support of this Motion are the:

- (1) Plaintiffs' Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement Agreement;
- (2) Declaration of Joseph P. Guglielmo in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement Agreement; and
- (3) Declaration of RG/2 Claims Administration, LLC in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement Agreement.

Dated: July 13, 2021 **SCOTT+SCOTT ATTORNEYS AT LAW LLP**

s/ Joseph P. Guglielmo
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Counsel for Plaintiffs and Proposed Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on July 13, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

s/ Joseph P. Guglielmo
Joseph P. Guglielmo