



**(501) 682-1517 local**  
**(501) 682-2359 fax**  
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## Board of Trustees

View the **[Board of Trustees Meeting Schedule](#)**.

**Position # 1, Member Trustee, 1st Congressional Dist.**

**Robin Nichols**

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Office (870) 910-7809

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Term Expires 6/30/2019

**Position # 2, Member Trustee, 2nd Congressional Dist.**

**Janet Watson**

200 NW 4th St.  
Bryant, AR 72022  
(501) 847-5605

**[jwatson@bryantschoools.org](mailto:jwatson@bryantschoools.org)**

Term Expires 6/30/2022

**Position # 3, Member Trustee, 3rd Congressional Dist.**

**Deborah Thompson**

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Fax: (479) 750-8861

**[dthompson@sdale.org](mailto:dthompson@sdale.org)**

Term Expires 6/30/2019

**Position # 4, Member Trustee, 4th Congressional Dist.**

**Kathy Clayton**

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Malvern, AR 72104

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Term Expires 6/30/2019

**Position # 5, Member Trustee, Administrator Trustee**

**Dr. Richard Abernathy**

Executive Director

Arkansas Association of Educational Administrators

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Little Rock, AR 72201

Office (501) 372-1691

Fax (501) 372-2807

**[r.abernathy@theaaea.org](mailto:r.abernathy@theaaea.org)**

Term Expires 6/30/2024

**Position # 6, Member Trustee, Administrator Trustee**

**Jeff Stubblefield (Chair)**

3912 Bloomer Heights

Charleston, AR 72933

**[jstubblefield@tigersmail.org](mailto:jstubblefield@tigersmail.org)**

Term Expires 6/30/2021

**Position # 7, Member Trustee, Non-Certified Trustee**

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[kdavis1@fortsmithschools.org](mailto:kdavis1@fortsmithschools.org)

Term Expires 6/30/2021

**Position # 8, Member Trustee, Minority Trustee**

**Anita Bell**

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[b42mag@aol.com](mailto:b42mag@aol.com)

Term Expires 6/30/2021

**Position # 9, Member Trustee, Retirant Trustee**

**Lloyd Black**

7 Timber Valley Cove  
Little Rock, AR 72204  
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[blackl1752@aol.com](mailto:blackl1752@aol.com)

Term Expires 6/30/2022

**Position # 10, Member Trustee, Retirant Trustee**

**Bobby G. Lester**

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Term Expires 6/30/2019

**Position # 11, Member Trustee, Retirant Trustee**

**Danny Knight** (Vice-Chair)

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Term Expires 6/30/2024

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**Arkansas Teacher Retirement System** 1400 West Third Street, Little Rock, AR  
72201 [Directions](#)

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682-2359 |   

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1 and 2 (a) Lead Plaintiff



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ERIC J. BELFI (*pro hac vice* TBD)  
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11 Counsel for Arkansas Teacher Retirement System

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
13 COUNTY OF SANTA CLARA

14 ARKANSAS TEACHER RETIREMENT )  
SYSTEM, Individually and on Behalf of All )  
15 Others Similarly Situated, )

16 Plaintiff, )

17 vs. )

18 A10 NETWORKS, INC., )  
LEF CHEN, )  
19 GREG STRAUGHN, )  
ROBERT COCHRAN, )  
20 PETER Y. CHUNG, )  
ALAN S. HENRICKS, )  
21 PHILLIP J. SALSBURY, )  
MORGAN STANLEY & CO. LLC, )  
22 MERRILL LYNCH, PIERCE, FENNER & )  
SMITH INCORPORATED, )  
23 J.P. MORGAN SECURITIES LLC, )  
RBC CAPITAL MARKETS LLC, )  
24 PACIFIC CREST SECURITIES LLC, )  
OPPENHEIMER & CO. INC. and )  
25 DOES 1-25, inclusive, )

26 Defendants. )

VIA FAX

Case No. **115CV278575**

CLASS ACTION

COMPLAINT FOR VIOLATIONS OF THE  
SECURITIES ACT OF 1933

DEMAND FOR JURY TRIAL

FILED Santa Clara County  
05/25/15 8:56am  
David H. Yamasaki  
Chief Executive Officer  
By: sackard DTSDIV010101  
R#201300024647  
OK \$1,435.00  
TL \$1,435.00  
Case: 1:15-cv-278575

1 PRAYER FOR RELIEF

2 WHEREFORE, Plaintiff prays for relief and judgment, as follows:

3 A. Determining that this action is a proper class action, certifying Plaintiff as a Class  
4 representative under California Code of Civil Procedure §382 and Rule 3.764 of the California Rules of  
5 Court, and appointing Plaintiff's counsel as Class Counsel;

6 B. Awarding compensatory damages in favor of Plaintiff and other Class members against  
7 all Defendants, jointly and severally, for all damages sustained as a result of Defendants' wrongdoing,  
8 in an amount to be proven at trial, including interest thereon;

9 C. Awarding rescission or a rescissory measure of damages;

10 D. Awarding Plaintiff and the Class their reasonable costs and expenses incurred in this  
11 action, including counsel fees and expert fees; and

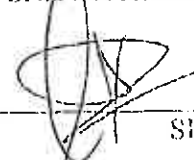
12 E. Awarding such other relief including equitable and/or injunctive relief as deemed  
13 appropriate by the Court.

14 JURY TRIAL DEMANDED

15 Plaintiff hereby demands a trial by jury.

16 DATED: March 24, 2015

17 ROBBINS GELLER RUDMAN  
& DOWD LLP  
SHAWN A. WILLIAMS

18 

19 SHAWN A. WILLIAMS

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21 One Montgomery Street, Suite 1800  
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24 Local Counsel



UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

NASHVILLE DIVISION

DR. JOSEPH F. KASPER, Individually and )  
On Behalf of All Others Similarly Situated, )

Plaintiff, )

v. )

AAC HOLDINGS, INC., JERROD N. )

MENZ, MICHAEL T. CARTWRIGHT, )

ANDREW W. MCWILLIAMS AND KIRK )

R. MANZ )

Defendants. )

No. 3:15-cv-00923

(Consolidated)

JUDGE CAMPBELL

MAGISTRATE JUDGE BRYANT

CLASS ACTION

JURY TRIAL DEMANDED

CONSOLIDATED CLASS ACTION COMPLAINT  
FOR VIOLATION OF FEDERAL SECURITIES LAWS

1. Determining that this action is a proper class action pursuant to Rule 23(a) and (b)(3) of the Federal Rules of Civil Procedure on behalf of the Class Classes as defined herein, and a certification of Plaintiffs as class representatives pursuant to Rule 23 of the Federal Rules of Civil Procedure and appointment of Plaintiffs' counsel as Class Counsel;

2. Awarding compensatory and punitive damages in favor of Plaintiffs and the other Class members against all Defendants, jointly and severally, for all damages sustained as a result of Defendants' wrongdoing, in an amount proven at trial, including pre judgment and post-judgment interest thereon;

3. Awarding Plaintiffs and other members of the Class their costs and expenses in this litigation, including reasonable attorneys' fees and experts' fees and other costs and disbursements; and

4. Awarding Plaintiffs and the other Class members such other relief as this Court may deem just and proper.

**XII. JURY DEMAND**

Plaintiffs hereby demand a trial by jury in this action of all issues so triable.

Dated: July 6, 2018

Respectfully submitted,

**BARRETT JOHNSTON MARTIN &  
GARRISON, LLC**

By: /s/ David W. Garrison  
David W. Garrison (No. 24968)  
Jerry E. Martin (No. 20193)  
Timothy L. Miles (No. 21605)  
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*Liaison Counsel for Lead Plaintiffs*

---

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**KAPLAN FOX & KILSHEIMER LLP**

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*Lead Counsel for Lead Plaintiffs and the Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

*In re Aaron's, Inc. Securities Litigation*

Civil Action No. 1:17-cv-02270-SCJ

CLASS ACTION

**CONSOLIDATED COMPLAINT  
FOR VIOLATIONS OF THE  
FEDERAL SECURITIES LAWS**

JURY TRIAL DEMANDED

(a) Declaring the action to be a proper class action pursuant to Rule 23(a) and (b)(3) of the Federal Rules of Civil Procedure on behalf of the Class defined herein;

(b) Awarding all damages and other remedies available under the Securities Exchange Act in favor of Lead Plaintiff and all members of the Class against all Defendants, including interest thereon;

(c) Awarding Lead Plaintiff and the Class their reasonable costs and expenses incurred in this action, including attorneys' fees and expert fees; and

(d) Such other further relief as the Court may deem just and proper.

### **JURY TRIAL DEMAND**

Lead Plaintiff hereby demands a trial by jury of all issues so triable.

Dated: October 27, 2017

Respectfully submitted,

/s/ Michael A. Caplan

Michael A. Caplan

**CAPLAN COBB LLP**

Georgia Bar No. 601039

75 Fourteenth Street, N.E.

Atlanta, Georgia 30309

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Facsimile: (404) 596-5604

*Liaison Counsel for the Class*

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*Co-Lead Counsel for Lead Plaintiff  
Arkansas Teacher Retirement System and  
the Class*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

OKLAHOMA LAW ENFORCEMENT  
RETIREMENT SYSTEM, Individually And On  
Behalf Of All Others Similarly Situated,

Plaintiff,

vs.

ADEPTUS HEALTH INC., *et al.*,

Defendants.

Case No. 4:17-CV-0449-ALM

Judge Amos L. Mazzant, III

**JURY TRIAL DEMANDED**

**CONSOLIDATED CLASS ACTION COMPLAINT**

**XVI. JURY DEMAND**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiffs hereby demand a trial by jury in this action of all issues so triable.

Dated: November 21, 2017

/s/ Clyde M. Siebman

Clyde M. Siebman  
Texas Bar No. 18341600  
Elizabeth S. Forrest  
Texas Bar No. 24086207

**SIEBMAN, BURG, PHILLIPS  
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ACERA and Arkansas Teacher*

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Abe Alexander  
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*Counsel for Lead Plaintiff ACERA and Arkansas  
Teacher, Named Plaintiff Miami, and Co-Lead  
Counsel for the Class*

Case	Civil No.	Date Filed
<i>Oklahoma Law Enforcement Retirement System v. Adeptus Health Inc.</i>	16-cv-1243	October 27, 2016
<i>Laborers' Local 235 Benefit Funds v. Adeptus Health Inc.</i>	16-cv-1391	December 22, 2016

These actions present virtually identical factual and legal issues because they each arise out of the same alleged misstatements regarding the Company's fraudulent billing scheme.<sup>4</sup> Accordingly, consolidation is appropriate under Rule 42(a) of the Federal Rules of Civil Procedure. *See In re BP*, 758 F. Supp. 2d at 432-33 (consolidating seven securities class action suits alleging defendant company issued materially false and misleading statements).

### CONCLUSION

For the reasons stated herein, ACERA and Arkansas Teacher respectfully request that the Court appoint them as Lead Plaintiff, approve their selection of Bernstein Litowitz and Kessler Topaz as Co-Lead Counsel for the class and George L. McWilliams as Liaison Counsel for the class, consolidate all related actions pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, and grant such other relief as the Court may deem just and proper.

DATED: December 27, 2016

Respectfully Submitted,

/s/ George L. McWilliams

George L. McWilliams  
 Texas Bar No. 13877000  
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 MCWILLIAMS, P.C.**  
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 Texarkana, Texas-Arkansas 75504  
 Tel: (870) 772-2055  
 Fax: (870) 772-0513

<sup>4</sup> These actions assert the same Exchange Act claims against overlapping defendants but *Oklahoma* asserts a class period of April 23, 2015, through November 16, 2015, while *Laborers* asserts a class period of June 25, 2014, through November 1, 2016. *Laborers* also asserts claims under the Securities Act not included in *Oklahoma*. These differences do not render consolidation inappropriate, however, because the cases present nearly identical questions of fact and law, and the interests of judicial economy would be served by consolidation.

glmlawoffice@gmail.com

---

*Liaison Counsel for Proposed Lead  
Plaintiff ACERA and Arkansas Teacher*

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(*pro hac vice* application forthcoming)  
Avi Josefson  
(*pro hac vice* application forthcoming)  
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*Co-Lead Counsel for the Class*

10

[Additional counsel  
11 listed on signature page]

**UNITED STATES DISTRICT COURT**

12

**NORTHERN DISTRICT OF CALIFORNIA**

13

BABAK HATAMIAN, et al.,

) **CASE NO. 3:14-cv-00226-JD**

14

Plaintiffs,

)

15

v.

) **CORRECTED AMENDED CLASS**

) **ACTION COMPLAINT**

16

ADVANCED MICRO DEVICES, INC., et al.,

) **FOR VIOLATIONS OF THE**

) **FEDERAL SECURITIES LAWS**

17

Defendants.

) **LEAVE TO FILE GRANTED ON JUNE**

) **10, 2014**

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19

) **Jury Trial Demanded**

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1 representatives, and appointing Labaton Sucharow LLP and Motley Rice LLC as class counsel  
2 pursuant to Rule 23(g);

3 B. Declaring and determining that Defendants violated the Exchange Act by reason  
4 of the acts and omissions alleged herein;

5 C. Awarding Lead Plaintiffs and the Class compensatory damages against all  
6 Defendants, jointly and severally, in an amount to be proven at trial together with prejudgment  
7 interest thereon;

8 D. Awarding Lead Plaintiffs and the Class their reasonable costs and expenses  
9 incurred in this action, including but not limited to attorney's fees and costs incurred by  
10 consulting and testifying expert witnesses; and

11 E. Granting such other and further relief as the Court deems just and proper.

12 **XII. JURY DEMAND**

13 Lead Plaintiffs demand a trial by jury of all issues so triable.

14 Dated: June 11, 2014

15  
16 /s/ Jonathan Gardner  
**LABATON SUCHAROW LLP**  
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22  
23  
24 *Co-Lead Counsel for the Class*

25  
26 **LIEFF CABRASER HEIMANN &**  
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Katherine C. Lubin (State Bar No. 259826)  
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*Liaison Counsel*



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

ARKANSAS TEACHER  
RETIREMENT SYSTEM, on Behalf of  
Itself and All Others Similarly Situated,

Plaintiff,

v.

C.A. No. \_\_\_\_\_ - \_\_\_\_\_

ALON USA ENERGY, INC., DELEK  
US HOLDINGS, INC., DELEK  
HOLDCO, INC., DIONE MERGECO,  
INC., ASTRO MERGECO, INC.,  
EZRA UZI YEMIN, ILAN COHEN,  
ASSAF GINZBURG, FREDEREC  
GREEN, RON W. HADDOCK,  
WILLIAM J. KACAL, ZALMAN  
SEGAL, MARK D. SMITH, AVIGAL  
SOREQ, FRANKLIN WHEELER, and  
DAVID WIESSMAN,

Defendants.

**VERIFIED CLASS ACTION COMPLAINT**

Plaintiff Arkansas Teacher Retirement System (“Plaintiff”), by and through its attorneys, brings this Verified Class Action Complaint (the “Complaint”) on its own behalf and on behalf of a class of all holders of Alon USA Energy, Inc. (“Alon” or the “Company”) common stock, other than Defendants and their affiliates, against the Board of Directors (the “Board”) of Alon and the controlling



F. Granting such other and further equitable relief as this Court may deem  
just and proper.

---

PRICKETT, JONES & ELLIOTT, P.A.

OF COUNSEL:

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& CHECK, LLP

Lee D. Rudy

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Grant Goodhart

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/s/ Michael Hanrahan

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Paul A. Fioravanti, Jr. (#3808)

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*Attorneys for Plaintiff*

Dated: June 15, 2017

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17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

19 PAUL MAZZAFERRO, Individually and On  
20 Behalf of All Others Similarly Situated,

21 Plaintiff,

22 v.

23 ARUBA NETWORKS, INC., DOMINIC P.  
ORR, MICHAEL M. GALVIN, and KEERTI  
MELKOTE,

24 Defendants.  
25  
26  
27  
28

Case No. CV-13-02342 YGR

**CLASS ACTION**

**ARKANSAS TEACHER RETIREMENT  
SYSTEM'S NOTICE OF MOTION AND  
MOTION FOR APPOINTMENT AS LEAD  
PLAINTIFF AND APPROVAL OF ITS  
SELECTION OF CO-LEAD COUNSEL;  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT THEREOF**

**DEMAND FOR JURY TRIAL**

Date: August 27, 2013  
Time: 2:00 p.m.  
Room: 5 – 2nd Floor  
Judge: Hon. Yvonne Gonzalez Rogers

1 Topaz “in complex civil proceedings”). In addition to jointly prosecuting securities class actions,  
2 Kessler Topaz and Nix Patterson also have jointly recovered hundreds of millions of dollars on  
3 behalf of institutional investors harmed by their custodial banks. *See, e.g.,* Abadou Decl., Exs. D  
4 & E (*CompSource Okla. v. BNY Mellon, N.A.*, No. 08-cv-00469-KEW (E.D. Okla. filed Dec. 19,  
5 2008) (\$280 million recovery); *Bd. of Trs. of the AFTRA Ret. Fund v. JPMorgan Chase Bank,*  
6 *N.A.*, No. 09-cv-00686-SAS-DCF (S.D.N.Y. filed Jan. 23, 2009) (\$150 million recovery)).

7 Thus, the Court can be assured that the class will receive the highest caliber of legal  
8 representation should it approve Arkansas Teacher’s selection of Kessler Topaz and Nix  
9 Patterson as Co-Lead Counsel for the class.

10 **IV. CONCLUSION**

11 For the foregoing reasons, Arkansas Teacher respectfully requests that the Court:  
12 (1) appoint Arkansas Teacher as Lead Plaintiff; and (2) approve Arkansas Teacher’s selection of  
13 Kessler Topaz and Nix Patterson as Co-Lead Counsel for the class.

14 Dated: July 22, 2013

Respectfully submitted,

15  
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& CHECK, LLP

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*Counsel for Arkansas Teacher Retirement System  
and Proposed Co-Lead Counsel for the Class*

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA

ERIC OLLILA, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiff,

vs.

BABCOCK & WILCOX ENTERPRISES, INC.,  
E. JAMES FERLAND and JENNY L. APKER,

Defendants

CIVIL ACTION NO.: 3:17-CV-00109

JURY TRIAL DEMANDED

**SECOND AMENDED CONSOLIDATED COMPLAINT  
FOR VIOLATIONS OF FEDERAL SECURITIES LAWS**

### XIII. PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment as follows:

- a. Declaring the action to be a proper class action pursuant to Fed. R. Civ. P. 23;
- b. Awarding Plaintiffs and the members of the Class damages, including interest;
- c. Awarding Plaintiffs' counsel reasonable costs and attorneys' fees; and
- d. Awarding such equitable/injunctive or other relief as the Court may deem just and proper.

### XIV. JURY DEMAND

Plaintiffs demand a trial by jury.

Dated: September 28, 2017

**KAPLAN FOX & KILSHEIMER LLP**

*/s/ Frederic S. Fox*

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This Motion is based upon the accompanying Memorandum of Law in support thereof, the Declaration of Dhamian Blue filed herewith, the pleadings and other filings herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, ATRS respectfully requests that the Court: (i) consolidate the Related Actions under Rule 42(a); (ii) appoint ATRS as Lead Plaintiff for the Class; and (iii) approve ATRS' selection of Kaplan Fox as Lead Counsel for the Class and Blue LLP as Liaison Counsel for the Class.

DATED: May 2, 2017

Respectfully submitted,

By: s/ Dhamian Blue

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*Counsel for Arkansas Teacher Retirement System  
and Proposed Lead Counsel for the Class*



**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

IN RE THE BANCORP INC. SECURITIES  
LITIGATION

Case No. 14 Civ. 0952 (SLR)

**JURY TRIAL DEMANDED**

**ECF CASE**

**AMENDED CONSOLIDATED CLASS ACTION COMPLAINT**

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*Attorneys for Lead Plaintiffs Arkansas Teacher  
Retirement System and Arkansas Public  
Employees Retirement System*

DATED: October 26, 2015

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

POLICEMEN'S ANNUITY AND  
BENEFIT FUND OF THE CITY OF  
CHICAGO, LABORERS' PENSION FUND  
AND HEALTH AND WELFARE  
DEPARTMENT OF THE  
CONSTRUCTION AND GENERAL  
LABORERS' DISTRICT COUNCIL OF  
CHICAGO AND VICINITY, IOWA  
PUBLIC EMPLOYEES' RETIREMENT  
SYSTEM, ARKANSAS PUBLIC  
EMPLOYEES' RETIREMENT SYSTEM,  
VERMONT PENSION INVESTMENT  
COMMITTEE, WASHINGTON STATE  
INVESTMENT BOARD, ARKANSAS  
TEACHER RETIREMENT SYSTEM,  
PUBLIC EMPLOYEES' RETIREMENT  
SYSTEM OF MISSISSIPPI, CITY OF  
TALLAHASSEE RETIREMENT  
SYSTEM, and CENTRAL STATES,  
SOUTHEAST AND SOUTHWEST  
AREAS PENSION FUND,

Plaintiffs,

- against -

BANK OF AMERICA, NA (as Trustee  
Under Various Pooling and Servicing  
Agreements), and U.S. BANK NATIONAL  
ASSOCIATION (as Trustee Under Various  
Pooling and Servicing Agreements),

Defendants.

CASE NO. 1:12-CV-02865-KBF

CONSOLIDATED THIRD AMENDED  
CLASS ACTION COMPLAINT

JURY TRIAL DEMANDED

SUMMARY OF THE ACTION

1. Plaintiffs Policemen's Annuity and Benefit Fund of the City of Chicago ("Chicago Police") and Laborers' Pension Fund and Health and Welfare Department of the Construction, General Laborers' District Council of Chicago and Vicinity ("Chicago

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiffs pray for relief and judgment, as follows:

- A. Awarding compensatory damages and/or equitable relief in favor of Plaintiffs and the Class against Defendants for breaches of their statutory and contractual duties in an amount to be proven at trial, including interest thereon;
- B. Awarding Plaintiffs their reasonable costs and expenses incurred in this action, including counsel fees and expert fees; and
- C. Such other relief as the Court may deem just and proper.

**JURY DEMAND**

Plaintiffs demand a trial by jury on all claims so triable.

Dated: October 31, 2013

SCOTT+SCOTT, ATTORNEYS AT LAW, LLP



---

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*Counsel for Plaintiff Chicago Police and Central States, Southeast and Southwest Areas Pension Fund*

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*Counsel for Plaintiffs Vermont Pension Investment  
Committee, Washington State Investment Board,  
Arkansas Teacher Retirement System, Public*

*Employees' Retirement System of Mississippi, and  
City of Tallahassee Retirement System*

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE No. 9:14-cv-81323-DMM

THE CITY OF LOS ANGELES, ACTING  
THROUGH ITS FIRE AND POLICE  
PENSION SYSTEM, ACTING BY ORDER  
OF AND THROUGH ITS BOARD OF FIRE  
AND POLICE PENSION  
COMMISSIONERS, individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

BANKRATE, INC., EDWARD J.  
DIMARIA, KENNETH S. ESTEROW,  
GOLDMAN SACHS & CO., MERRILL  
LYNCH, PIERCE, FENNER & SMITH, INC.,  
RBC CAPITAL MARKETS, LLC, and  
STEPHENS, INC.,

Defendants.

SECOND AMENDED CLASS ACTION COMPLAINT

**X. JURY TRIAL DEMANDED**

Lead Plaintiff hereby demands a trial by jury on all triable claims.

Dated: December 8, 2015

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**SAXENA WHITE P.A.**

/s/ Lester Hooker

Lester Hooker

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Joseph E. White

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Acting by Order of and Through its Board of  
Fire and Police Pension Commissioners,  
and Lead Counsel for the Class*



UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

ARKANSAS TEACHER RETIREMENT SYSTEM,  
on behalf of itself and all others similarly situated,

*Plaintiff,*

vs.

BANK OF NOVA SCOTIA, NEW YORK  
AGENCY; BMO CAPITAL MARKETS CORP.;  
BNP-PARIBAS SECURITIES CORP.; BARCLAYS  
CAPITAL INC.; CANTOR FITZGERALD & CO.;  
CITIGROUP GLOBAL MARKETS INC.; CREDIT  
SUISSE SECURITIES (USA) LLC; DAIWA  
CAPITAL MARKETS AMERICA INC.;  
DEUTSCHE BANK SECURITIES INC.;  
GOLDMAN, SACHS & CO.; HSBC SECURITIES  
(USA) INC.; JEFFERIES LLC; J.P. MORGAN  
SECURITIES LLC; MERRILL LYNCH, PIERCE,  
FENNER & SMITH INCORPORATED; MIZUHO  
SECURITIES USA INC.; MORGAN STANLEY &  
CO. LLC; NOMURA SECURITIES  
INTERNATIONAL, INC.; RBC CAPITAL  
MARKETS, LLC; RBS SECURITIES INC.; SG  
AMERICAS SECURITIES, LLC; TD SECURITIES  
(USA) LLC; and UBS SECURITIES LLC,

*Defendants.*

No.

CLASS ACTION COMPLAINT

JURY TRIAL DEMANDED

**DEMAND FOR JURY TRIAL**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff demands a jury trial as to all issues triable by a jury.

Dated: July 24, 2015

**LABATON SUCHAROW LLP**



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*Counsel for Plaintiff Arkansas Teacher Retirement System and the Proposed Class*

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE BP P.L.C. SECURITIES LITIGATION

MDL 2185

Case No. 4:10-md-02185

ARKANSAS TEACHER RETIREMENT SYSTEM,  
EMPLOYEES' RETIREMENT SYSTEM OF THE  
STATE OF HAWAII and ILLINOIS MUNICIPAL  
RETIREMENT FUND,

Plaintiffs,

v.

Case No. 4:14-cv-00457

BP P.L.C., BP AMERICA INC., BP EXPLORATION &  
PRODUCTION INC., ROBERT W. DUDLEY,  
ANTHONY B. HAYWARD, ANDREW G. INGLIS,  
ROBERT MALONE, H. LAMAR MCKAY, DAVID  
RAINEY and DOUGLAS J. SUTTLES,

Defendants.

AMENDED COMPLAINT

C. An award in favor of Plaintiffs against all Defendants, jointly and severally, for all punitive damages Plaintiffs are entitled to as a result of Defendants' wrongdoing, in an amount to be proved at trial;

D. An award in favor of Plaintiffs of the costs, expenses, and disbursements of this action, including any attorneys' and experts' fees, if applicable, together with pre- and post-judgment interest; and

E. An award in favor of Plaintiffs of any other relief as this Court deems just, equitable, and proper.

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**DEMAND FOR JURY TRIAL**

Plaintiffs hereby demand a trial by jury on all issues so triable.

Dated: August 31, 2015

Respectfully submitted,

**MASHAYEKH & CHARGOIS, P.C.**

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*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DENIS CHAVEZ, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

CELADON GROUP, INC., BOBBY L.  
PEAVLER, and PAUL A. WILL,

Defendants.

No. 17 Civ. 2828

**CLASS ACTION COMPLAINT FOR  
VIOLATIONS OF THE FEDERAL  
SECURITIES LAWS**

**JURY TRIAL DEMANDED**

Plaintiff Denis Chavez (“Plaintiff”), by and through his attorneys, alleges upon personal knowledge as to himself, and upon information and belief as to all other matters, based upon the investigation conducted by and through his attorneys, which included, among other things, a review of documents filed by Defendants (as defined below) with the United States Securities and Exchange Commission (the “SEC”), conference call transcripts, news reports, press releases issued by Defendants, and other publicly available documents, as follows:

**NATURE AND SUMMARY OF THE ACTION**

1. This is a federal securities class action on behalf of all investors who purchased or otherwise acquired Defendant Celadon Group, Inc. (“CGI” or the “Company”) common stock between December 30, 2016 through April 18, 2017 inclusive (the “Class Period”). This action is brought on behalf of the Class for violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 (the “Exchange Act”), 15 U.S.C. §§78j(b) and 78t(a) and Rule 10b-5 promulgated thereunder by the SEC, 17 C.F.R. §240.10b-5.

Dated: April 19, 2017

---

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---

**BLOCK & LEVITON LLP**

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*Counsel for Plaintiff*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SUSIE ONG, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiff,

v.

CHIPOTLE MEXICAN GRILL, INC., M.  
STEVEN ELLS, MONTGOMERY F.  
MORAN, and JOHN R. HARTUNG,

Defendants.

No. 1:16-cv-00141-KPF

**NOTICE OF MOTION OF THE ARKANSAS TEACHER RETIREMENT  
SYSTEM FOR APPOINTMENT AS LEAD PLAINTIFF AND  
APPROVAL OF ITS SELECTION OF LEAD COUNSEL**

This Motion is based upon this Notice of Motion, the accompanying Memorandum of Law in support thereof, the Declaration of Gerald H. Silk filed herewith, the pleadings and other filings herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, Arkansas Teacher respectfully requests that the Court: (1) appoint Arkansas Teacher as Lead Plaintiff in the above-captioned action pursuant to the PSLRA; (2) approve Arkansas Teacher's selection of Bernstein Litowitz to serve as Lead Counsel for the Class; and (3) grant such further relief as the Court may deem just and proper.

Dated: March 8, 2016

Respectfully submitted,

---

/s/ Gerald H. Silk

Gerald H. Silk

Avi Josefson

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Arkansas Teacher Retirement System and  
Proposed Lead Counsel for the Class*



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

---

IN RE CITIGROUP INC. BOND LITIGATION

Master File No. 08 Civ. 9522 (SHS)

**CONSOLIDATED AMENDED  
CLASS ACTION COMPLAINT**

**JURY TRIAL DEMANDED**

**ECF CASE**

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b. Awarding all damages and other remedies set forth in the Securities Act in favor of Plaintiff and all members of the Class against Defendants in an amount to be proven at trial, including interest thereon;

c. Awarding Plaintiffs and the Class their reasonable costs and expenses incurred in this action, including counsel fees and expert fees; and

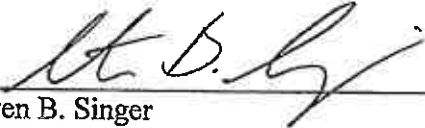
d. Such other and further relief as the Court may deem just and proper.

**JURY TRIAL DEMANDED**

Plaintiffs hereby demand a jury trial.

Dated: January 15, 2009  
New York, New York

**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**

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**IN THE DISTRICT COURT OF THE UNITED STATES FOR THE  
MIDDLE DISTRICT OF ALABAMA, NORTHERN DIVISION**

In re  
COLONIAL BANCGROUP, INC.  
SECURITIES LITIGATION

)  
) Case No.

) 2:09-CV-00104-RDP-WC  
)

) **FIRST AMENDED CONSOLIDATED**  
) **CLASS ACTION COMPLAINT**  
) **FOR VIOLATION OF THE**  
) **FEDERAL SECURITIES LAWS**  
)

) **JURY TRIAL DEMANDED**  
)

Dated: April 29, 2011

Respectfully submitted,

Tyrone C. Means (MEA003)

H. Lewis Gillis (GIL011)

Gerald C. Brooks (BRO212)

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*Liaison Counsel*

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*Attorneys for Arkansas Teacher Retirement System, The State-Boston Retirement System, The Norfolk County Retirement System and City of Brockton Retirement System and Proposed Lead Counsel for the Class*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE COMVAULT SYSTEMS, INC.  
SECURITIES LITIGATION**

Master File No. 14-5628 (MAS) (LHG)

**SECOND AMENDED CLASS  
ACTION COMPLAINT AND  
DEMAND FOR JURY TRIAL**

---

operations of the Company, and intimate knowledge of the Company's actual performance, and their power to control public statements about CommVault, the Individual Defendants had the power and ability to control the actions of CommVault and its employees. By reason of such conduct, the Individual Defendants are liable pursuant to Section 20(a) of the Exchange Act.

**XIII. PRAYER FOR RELIEF**

WHEREFORE, Lead Plaintiff prays for judgment as follows:

- (a) Determining that this action is a proper class action under Rule 23 of the Federal Rules of Civil Procedure;
- (b) ~~Awarding compensatory damages in favor of Lead Plaintiff and other Class members against all Defendants, jointly and severally, for all damages sustained as a result of Defendants' wrongdoing, in an amount to be proven at trial, including interest thereon;~~
- (c) Awarding Lead Plaintiff and the Class their reasonable costs and expenses incurred in this action, including attorneys' fees and expert fees; and
- (d) Awarding such equitable, injunctive, or other further relief as the Court may deem just and proper.

**XIV. JURY DEMAND**

Lead Plaintiff hereby demands a trial by jury of all issues so triable.

Dated: February 5, 2016

s/ James E. Cecchi  
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*Local Counsel for Lead Plaintiff Arkansas Teacher  
Retirement System and the Class*

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*Additional Counsel for Lead Plaintiff*



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE DFC GLOBAL CORP. SECURITIES  
LITIGATION

Civ. A. No. 2:13-cv-06731-BMS

JURY TRIAL DEMANDED

CONSOLIDATED CLASS ACTION COMPLAINT

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CRAIG FRIEDMAN, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ENDO INTERNATIONAL PLC, RAJIV  
KANISHKA LIYANAARCHCHIE DE  
SILVA, and SUKETU P. UPADHYAY,

Defendants.

Case No. 16 Civ. 3912 (JMF)

**NOTICE OF THE MOTION OF ARKANSAS TEACHER RETIREMENT SYSTEM  
FOR APPOINTMENT AS LEAD PLAINTIFF AND  
APPROVAL OF ITS SELECTION OF LEAD COUNSEL**

PLEASE TAKE NOTICE that on August 19, 2016, at 10:00 a.m., before the Honorable Jesse M. Furman, at the United States District Court for the Southern District of New York, located at the Thurgood Marshall United States Courthouse, 40 Centre Street, Courtroom 1105, New York, New York, putative class member Arkansas Teacher Retirement System (“Arkansas Teacher”), by its undersigned counsel, will respectfully move this Court for entry of an Order pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4(a)(3)(B): (1) appointing Arkansas Teacher as Lead Plaintiff; and (2) approving Arkansas Teacher’s selection of Kessler Topaz Meltzer & Check, LLP as Lead Counsel for the class.

This Motion is made on the grounds that Arkansas Teacher is the “most adequate plaintiff” pursuant to the PSLRA. In support of this Motion, Arkansas Teacher submits herewith the Memorandum of Law in Support of the Motion of Arkansas Teacher Retirement System for Appointment as Lead Plaintiff and Approval of Its Selection of Lead Counsel and the Declaration of Geoffrey C. Jarvis in Support of the Motion of Arkansas Teacher Retirement System for Appointment as Lead Plaintiff and Approval of Its Selection of Lead Counsel.

DATED: July 25, 2016

Respectfully submitted,

**KESSLER TOPAZ  
MELTZER & CHECK, LLP**

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Darren J. Check  
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jrdavidson@ktmc.com

*Counsel for Arkansas Teacher Retirement  
System and Proposed Lead Counsel for the  
Class*

---

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 2 Louis Gottlieb (*pro hac vice*)  
 Irina Vasilchenko (*pro hac vice*)  
 3 Jeffrey A. Dubbin (SBN 287199)  
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 8 wtsang@labaton.com

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*for the Class*

10 **BERMAN DEVALERIO**  
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 14 Email: nlavallee@bermandevalerio.com  
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15 *Liaison Counsel for the Class*

17 **UNITED STATES DISTRICT COURT**  
 18 **NORTHERN DISTRICT OF CALIFORNIA**  
 19 **SAN JOSE DIVISION**

20 In re EXTREME NETWORKS, INC.  
 21 SECURITIES LITIGATION,  
 22 This Document Relates to:  
 23 All Actions.

Master File No. 3:15-cv-04883-BLF

CLASS ACTION

**AMENDED CONSOLIDATED CLASS  
 ACTION COMPLAINT  
 FOR VIOLATIONS OF THE  
 FEDERAL SECURITIES LAWS**

Jury Trial Demanded

1           452. By reason of the foregoing, Defendants Berger, Arola and Kurtzweil are liable to  
2 Lead Plaintiff and the members of the Class as controlling persons of Extreme in violation of  
3 Section 20(a) of the Exchange Act.

4 **XII. PRAYER FOR RELIEF**

5           WHEREFORE, Lead Plaintiff respectfully prays for judgment as follows:

6           A. Determining that this action is a proper class action maintained under Rules  
7 23(a) and (b)(3) of the Federal Rules of Civil Procedure, certifying Lead Plaintiff as class  
8 representative, and appointing Labaton Sucharow LLP as class counsel pursuant to Rule 23(g);

9           B. Declaring and determining that Defendants violated the Exchange Act by reason  
10 of the acts and omissions alleged herein;

11           C. Awarding Lead Plaintiff and the Class compensatory damages against all  
12 Defendants, jointly and severally, in an amount to be proven at trial together with prejudgment  
13 interest thereon;

14           D. Awarding Lead Plaintiff and the Class their reasonable costs and expenses  
15 incurred in this action, including but not limited to attorney's fees and costs incurred by  
16 consulting and testifying expert witnesses; and

17           E. Granting such other and further relief as the Court deems just and proper.

18 **XIII. JURY DEMAND**

19           Lead Plaintiff demands a trial by jury of all issues so triable.

20 Dated: June 2, 2017

LABATON SUCHAROW LLP

21 By: /s/ Thomas A. Dubbs  
22 Thomas A. Dubbs

23 Louis Gottlieb  
24 Irina Vasilchenko  
25 Jeffrey A. Dubbin (SBN 287199)  
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*Lead Counsel for the Class*

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*Liaison Counsel*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE FACEBOOK, INC., IPO SECURITIES  
AND DERIVATIVE LITIGATION

MDL No. 12-2389 (RWS)

**CONSOLIDATED CLASS ACTION  
COMPLAINT**

**JURY TRIAL DEMANDED**

This document relates to the  
Consolidated Securities Action:

No. 12-cv-4081	No. 12-cv-4763
No. 12-cv-4099	No. 12-cv-4777
No. 12-cv-4131	No. 12-cv-5511
No. 12-cv-4150	No. 12-cv-7542
No. 12-cv-4157	No. 12-cv-7543
No. 12-cv-4184	No. 12-cv-7544
No. 12-cv-4194	No. 12-cv-7545
No. 12-cv-4215	No. 12-cv-7546
No. 12-cv-4252	No. 12-cv-7547
No. 12-cv-4291	No. 12-cv-7548
No. 12-cv-4312	No. 12-cv-7550
No. 12-cv-4332	No. 12-cv-7551
No. 12-cv-4360	No. 12-cv-7552
No. 12-cv-4362	No. 12-cv-7586
No. 12-cv-4551	No. 12-cv-7587
No. 12-cv-4648	

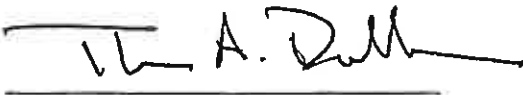


Dated: February 28, 2013  
New York, New York

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John J. Rizio-Hamilton

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Jose G. Galvan and Mary Jane Lule Galvan*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

RICHARD HAAN, Individually and on Behalf )  
of All Others Similarly Situated, )

Plaintiff, )

vs. )

FIVE BELOW, INC., DAVID )  
SCHLESSINGER, THOMAS G. VELLIOS, )  
JOEL D. ANDERSON and KENNETH R. )  
BULL, )

Defendants. )

Civ. Action No.

CLASS ACTION

COMPLAINT FOR VIOLATIONS OF THE  
FEDERAL SECURITIES LAWS

DEMAND FOR JURY TRIAL

**PRAYER FOR RELIEF**

WHEREFORE, plaintiff prays for relief and judgment, as follows:

A. Determining that this action is a proper class action, designating plaintiff as Lead Plaintiff and certifying plaintiff as a Class representative under Rule 23 of the Federal Rules of Civil Procedure and plaintiff's counsel as Lead Counsel;

B. Awarding compensatory damages in favor of plaintiff and the other Class members against all defendants, jointly and severally, for all damages sustained as a result of defendants' wrongdoing, in an amount to be proven at trial, including interest thereon;

C. Awarding plaintiff and the Class their reasonable costs and expenses incurred in this action, including counsel fees and expert fees; and


D. Awarding such equitable/injunctive or other relief as deemed appropriate by the Court.

**JURY DEMAND**

Plaintiff demands a trial by jury.

DATED: January 15, 2015

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DEBORAH R. GROSS

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Attorneys for Plaintiff

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JOHN ORTUZAR, *Individually and On Behalf  
of All Others Similarly Situated,*

Plaintiff,

v.

FRANCESCA'S HOLDINGS CORPORATION,  
*et al.,*

Defendants.

)  
)  
) Case No. 1:13-cv-06882-RJS

) Case No. 1:13-cv-07804-RJS

)  
) **CONSOLIDATED CLASS ACTION**  
) **COMPLAINT**

) **JURY TRIAL DEMANDED**  
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2014 MAR 14 PM 7:36  
U.S. DISTRICT COURT SDNY

Lead Plaintiff demands a trial by jury for all issues so triable.

Dated: March 14, 2014

Respectfully submitted,

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System and the Class*

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Plaintiff the Arkansas Teacher  
Retirement System and the Class  
and Counsel for Additionally  
Named Plaintiffs Plymouth  
County Retirement System and  
Greater Pennsylvania  
Carpenters' Pension Fund*

**UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT**

IN RE FRONTIER COMMUNICATIONS  
CORPORATION SECURITIES LITIGATION

No. 3:17-cv-01617-VAB

**JURY TRIAL DEMANDED**

ECF CASE

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**CONSOLIDATED CLASS ACTION COMPLAINT FOR  
VIOLATIONS OF THE FEDERAL SECURITIES LAWS**

365. A class action is superior to other available methods for the fair and efficient adjudication of this controversy.

**XV. PRAYER FOR RELIEF**

366. WHEREFORE, Plaintiffs pray for judgment individually and on behalf of the Class, as follows:

- a) Declaring this action to be a proper class action pursuant to Rule 23 of the Federal Rules of Civil Procedure;
  - b) Awarding Plaintiffs and the Class members damages, including interest;
  - c) Awarding Plaintiffs reasonable costs, including attorneys' and experts' fees; and
  - d) Awarding such equitable/injunctive or other relief for the benefit of the Class as the court may deem just and proper.
- 

**XVI. JURY DEMAND**

Lead Plaintiffs hereby demand a trial by jury on all issues.

Dated: April 30, 2018

Respectfully submitted,

/s/ Katherine M. Sinderson

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*Liaison Counsel for Lead Plaintiffs Arkansas  
Teacher Retirement System and Carlos  
Lagomarsino*

---

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JIHAD A. HACHEM,

Plaintiff,

v.

GENERAL ELECTRIC COMPANY,  
JEFFREY R. IMMELT, JEFFREY S.  
BORNSTEIN, JOHN L. FLANNERY, JAMIE  
MILLER, AND KEITH S. SHERIN,

Defendants.

LEAD CASE: No. 17-CV-8457 (JMF)  
Hon. Jesse M. Furman

CLASS ACTION

JURY TRIAL DEMANDED

**CONSOLIDATED AMENDED CLASS ACTION COMPLAINT  
FOR VIOLATIONS OF THE FEDERAL SECURITIES LAWS**

B. Awarding compensatory damages in favor of Plaintiff and the other Class members against all Defendants, jointly and severally, for all damages sustained as a result of Defendants' wrongdoing, in an amount to be proven at trial, including interest thereon;

C. Awarding Plaintiff and the Class their reasonable costs and expenses incurred in this action, including counsel fees and expert fees; and

D. Awarding such equitable/injunctive or other relief as deemed appropriate by the Court.

**JURY DEMAND**

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Plaintiff demands a trial by jury.

DATED: March 20, 2018

Respectfully submitted,

/s/ Jonathan Gardner  
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---

*Additional Counsel for Lead Plaintiff and the  
Proposed Class*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

NEW YORK STATE TEACHERS'  
RETIREMENT SYSTEM, Individually  
and on Behalf of All Other Persons  
Similarly Situated,

Plaintiff,

Civil Case No. 14-cv-11191

Honorable Linda V. Parker

**Jury Trial Demanded**

v.

GENERAL MOTORS COMPANY,  
DANIEL F. AKERSON, NICHOLAS S.  
CYPRUS, CHRISTOPHER P. LIDDELL,  
DANIEL AMMANN, CHARLES K.  
STEVENS, III, MARY T. BARRA,  
THOMAS S. TIMKO, and GAY KENT,

Defendants.

**CONSOLIDATED CLASS ACTION COMPLAINT**

DATED: January 15, 2015

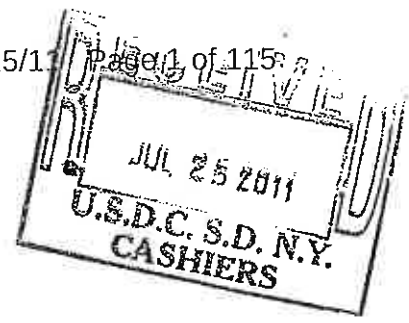
/s/ Salvatore J. Graziano  
Salvatore J. Graziano  
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*Local Counsel for Lead Plaintiff and for the Class*

NY/863676



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re GOLDMAN SACHS GROUP, INC. SECURITIES LITIGATION	: x	Master File No. 1:10-cv-03461-PAC
	:	<u>CLASS ACTION</u>
This Document Relates To:	:	<u>JURY TRIAL DEMANDED</u>
ALL ACTIONS.	:	<u>ECF CASE</u>
	: x	

**CONSOLIDATED CLASS ACTION COMPLAINT FOR  
VIOLATIONS OF FEDERAL SECURITIES LAWS**

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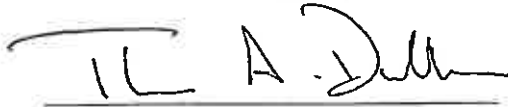
D. Awarding such equitable/injunctive or other relief as the Court may deem just and proper.

**JURY DEMAND**

Lead Plaintiffs demand a trial by jury.

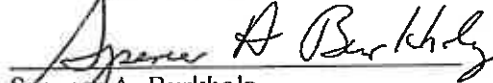
DATED: July 25, 2011

LABATON SUCHAROW LLP



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*Institutional Investor Group and*  
11 *Co-Lead Counsel for the Class*

12 [Additional counsel  
listed on signature page]

14 UNITED STATES DISTRICT COURT  
15 CENTRAL DISTRICT OF CALIFORNIA  
16 SOUTHERN DIVISION

17 RICHARD GAMMEL, Individually  
18 and on behalf of all others similarly  
situated,  
19  
20 Plaintiff,  
21  
22 vs.  
HEWLETT-PACKARD COMPANY,  
23 LEO APOTHEKER and CATHERINE  
A. LESJAK,  
24  
25 Defendants.

No. SA CV 11-01404 AG (RNBx)  
CLASS ACTION  
**SECOND AMENDED CLASS  
ACTION COMPLAINT  
FOR VIOLATIONS OF THE  
FEDERAL SECURITIES LAWS**  
Jury Trial Demanded

BY \_\_\_\_\_  
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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
SANTA ANA

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1           280. By reason of the foregoing, the Individual Defendants are liable to  
2 Lead Plaintiffs and the members of the Class for violations of Section 20(a) of the  
3 Exchange Act.

4 **XIII. PRAYER FOR RELIEF**

5           WHEREFORE, Lead Plaintiffs respectfully pray for judgment as follows:

6           A. Determining that this action is a proper class action maintained under  
7 Rules 23(a) and (b)(3) of the Federal Rules of Civil Procedure, certifying Lead  
8 Plaintiffs as class representatives, and appointing Labaton Sucharow LLP and  
9 Motley Rice LLP as class co-counsel pursuant to Rule 23(g);

10           B. Declaring and determining that Defendants violated the Exchange Act  
11 by reason of the acts and omissions alleged herein;

12           C. Awarding Lead Plaintiffs and the Class compensatory damages  
13 against all Defendants, jointly and severally, in an amount to be proven at trial  
14 together with prejudgment interest thereon;

15           D. Awarding Lead Plaintiffs and the Class their reasonable costs and  
16 expenses incurred in this action, including but not limited to attorney's fees and  
17 fees and costs incurred by consulting and testifying expert witnesses; and

18           E. Granting such other and further relief as the Court deems just and  
19 proper.

20 **XIV. DEMAND FOR JURY TRIAL**

21           Lead Plaintiffs demand a trial by jury of all issues so triable.

22  
23 Dated: October 19, 2012

LABATON SUCHAROW LLP 

24 By: \_\_\_\_\_

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12 *Counsel for Plaintiff*

13  
14 **UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

15 PAUL ANSFIELD, Individually and On  
Behalf of All Others Similarly Situated,  
16  
17 Plaintiff,

18 v.

19 INFOBLOX, INC., ROBERT D. THOMAS,  
and REMO E. CANESSA,  
20  
21 Defendants.

Case No.

**CLASS ACTION COMPLAINT FOR  
VIOLATIONS OF THE FEDERAL  
SECURITIES LAWS**

**JURY TRIAL DEMANDED**

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**DEMAND FOR TRIAL BY JURY**

Plaintiff hereby demands a trial by jury.

Dated: May 30, 2014

**GREEN & NOBLIN, P.C.**

s/ Robert S. Green  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

PAUL ANSFIELD,  
Plaintiff,  
  
v.  
  
INFOBLOX, INC., et al.,  
Defendants.

Case No. 14-cv-02500-VC

**ORDER CONSOLIDATING CASES  
AND GRANTING RETIREMENT  
SYSTEMS' MOTION**

Re: Dkt. Nos. 15, 20, 21, 29, and 32


United States District Court  
Northern District of California

The Retirement Systems' motion to consolidate the following cases is granted: *Ansfield v. Infoblox, Inc.*, 3:14-cv-02500-VC, *Beqaj v. Infoblox, Inc.*, 14-cv-02564-VC, and *Achey v. Infoblox, Inc.*, 14-cv-02644-VC.

The Retirement Systems' motion to appoint them as lead plaintiff, with Labaton Sucharow as lead counsel and Lieff Cabraser Heimann & Bernstein as liaison counsel, is also granted. (Docket No. 21). The motions to appoint lead plaintiff filed by Ansfield (Docket No. 15), Lopez (Docket No. 20), Congemi (Docket No. 29), and Infoblox Investor Group (Docket No. 32) are denied.

**IT IS SO ORDERED.**

Dated: September 26, 2014

  
\_\_\_\_\_  
VINCE CHHABRIA  
United States District Judge

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ARKANSAS TEACHER RETIREMENT  
SYSTEM, THE CITY OF BRISTOL  
PENSION FUND, and THE CITY OF  
OMAHA POLICE AND FIRE RETIREMENT  
SYSTEM, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

INSULET CORPORATION, DUANE  
DESISTO, ALLISON DORVAL, BRIAN  
ROBERTS and CHARLES LIAMOS,

Defendants.

Civ. A. No. 15-12345-MLW

CLASS ACTION

**CONSOLIDATED COMPLAINT  
FOR VIOLATIONS OF THE  
FEDERAL SECURITIES LAWS**

JURY TRIAL DEMANDED

**ECF CASE**

DATED: June 1, 2016

*/s/ Glen DeValerio*

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*Additional Counsel for Lead Plaintiffs*

---

**CERTIFICATE OF SERVICE**

I, Glen DeValerio, hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on June 1, 2016.

*/s/ Glen DeValerio*

\_\_\_\_\_  
Glen DeValerio

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE JPMORGAN CHASE & CO.  
SECURITIES LITIGATION

) Master File No. 1:12-cv-03852-GBD

) **SECOND AMENDED**

) **CONSOLIDATED**

) **CLASS ACTION COMPLAINT**

) **JURY TRIAL DEMANDED**

) **ECF CASE**

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U S DISTRICT COURT SDNY

1. Court-appointed Lead Plaintiffs the Arkansas Teacher Retirement System (“Arkansas Teachers”), the Ohio Public Employees Retirement System (“Ohio PERS”), the School Employees Retirement System of Ohio (“SERS Ohio”), the State Teachers Retirement System of Ohio (“STRS Ohio”), Sjunde AP-Fonden (“AP7”), and the State of Oregon by and through the Oregon State Treasurer on behalf of the Common School Fund and, together with the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund (“Oregon”) (collectively, “Lead Plaintiffs”) bring this action individually and on behalf of all persons and entities, except Defendants and their affiliates (defined below in ¶¶36-41, 393), who purchased or otherwise acquired the publicly traded common stock of JPMorgan Chase & Co. (“JPMorgan” or the “Company”) between February 24, 2010 and May 21, 2012, inclusive (the “Class Period”) and were injured thereby.

2. Lead Plaintiffs allege the following based upon personal knowledge as to themselves and their own acts and upon information and belief as to all other matters. Lead Plaintiffs’ information and belief is based on, *inter alia*, the investigation of Court-appointed Co-Lead Counsel, Bernstein Litowitz Berger & Grossmann LLP, Grant & Eisenhofer P.A, and Kessler Topaz Meltzer & Check, LLP. The investigation included, but was not limited to, interviews and consultations with former employees of JPMorgan and its subsidiaries, as well as review and analysis of: (i) JPMorgan’s public filings with the U.S. Securities and Exchange Commission (“SEC”); (ii) research reports by securities and financial analysts; (iii) transcripts of investor conference calls; (iv) publicly available presentations and reports issued by JPMorgan, including the Report of JPMorgan Chase & Co. Management Task Force Regarding 2012 CIO Losses (the “JPMorgan Task Force Report”) and the Report of the Review Committee of the Board of Directors of JPMorgan Relating to the Board’s Oversight Function with Respect to

Rule 10b-5 promulgated thereunder, to Lead Plaintiffs and other members of the Class who purchased or otherwise acquired JPMorgan common stock during the Class Period. Moreover, as detailed above, during the Class Period during which the Individual Defendants served as officers of JPMorgan, each of the Individual Defendants is responsible for the material misstatements and omissions made by JPMorgan.

416. As a direct and proximate result of the Individual Defendants' wrongful conduct, Lead Plaintiffs and the other members of the Class suffered damages in connection with their purchases of JPMorgan common stock during the Class Period.

---

**PRAYER FOR RELIEF**

WHEREFORE, Lead Plaintiffs pray for relief and judgment, as follows:

1. Determining that this action is a proper class action under Rule 23(a) and (b)(3) of the Federal Rules of Civil Procedure on behalf of the Class defined herein;
2. Awarding compensatory damages in favor of Lead Plaintiffs and the other Class members against all Defendants, jointly and severally, for all damages sustained as a result of Defendants' wrongdoing, in an amount to be proven at trial, including interest thereon;
3. Awarding Plaintiffs and the Class their reasonable costs and expenses incurred in this action, including counsel fees and expert fees; and
4. Such other and further relief as the Court may deem just and proper.


**JURY TRIAL DEMANDED**

Plaintiffs hereby demand a trial by jury.

Dated: April 12, 2013

Respectfully Submitted,

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& GROSSMANN LLP**

  
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Class*

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*Special Assistant Attorneys General and  
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Oregon by and through the Oregon State  
Treasurer on behalf of the Common School  
Fund and, together with the Oregon Public  
Employee Retirement Board, on behalf of  
the Oregon Public Employee Retirement  
Fund*

---

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

_____ )		
DAVID HOPPAUGH, Individually and On )	)	
Behalf of All Others Similarly Situated, )	)	Civ. A. No. 1:12-cv-00103-CMH-IDD
	)	
Plaintiff, )	)	
vs. )	)	JURY TRIAL DEMANDED
	)	
K12 INC., RONALD J. PACKARD, and )	)	
HARRY T. HAWKS, )	)	CLASS ACTION
	)	
Defendants. )	)	
_____ )		

AMENDED CLASS ACTION COMPLAINT

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*Local Counsel for the Class*

Defendants' wrongful conduct, Plaintiff and other members of the Class suffered damages in connection with their purchases of the Company's common stock during the Class Period.

**WHEREFORE**, Plaintiff prays for relief and judgment, as follows:

(a) Determining that this action is a proper class action and certifying Arkansas as class representative under Rule 23 of the Federal Rules of Civil Procedure and Labaton Sucharow LLP as Lead Counsel;

(b) Awarding compensatory damages in favor of Plaintiff and the other Class members against all Defendants, jointly and severally, for all damages sustained as a result of Defendants' wrongdoing, in an amount to be proven at trial, including interest thereon;

(c) Awarding Plaintiff and the Class their reasonable costs and expenses incurred in this action, including counsel fees and expert fees; and

(d) Such other and further relief as the Court may deem just and proper.

**JURY TRIAL DEMANDED**

Plaintiff hereby demands a trial by jury.

DATED: June 22, 2012

**WEBSTER BOOK LLP**

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*Lead Counsel for the Class*

---

OCT - 1 2014

No.  
Vancouver Registry



*In the Supreme Court of British Columbia*

Between

**ARKANSAS TEACHER RETIREMENT SYSTEM**

Petitioner

and

**LIONS GATE ENTERTAINMENT CORP.**

Respondent

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**PETITION TO THE COURT**

---

**This proceeding has been started by the Petitioner for the relief set out in Part 1 below.**

If you intend to respond to this petition, you or your lawyer must

- (a) file a response to civil claim in Form 67 in the above-named registry of this court within the time for response to civil claim described below, and
- (b) serve on the Petitioner
  - (1) 2 copies of the filed response to petition, and
  - (2) 2 copies of each filed affidavit on which you intend to rely at the hearing.

**Orders, including orders granting the relief claimed, may be made against you, without any further notice to you, if you fail to file the response to petition within the time for response.**

**Time for response to civil claim**

A response to petition must be filed and served on the Petitioner,

- (a) if you were served with the petition anywhere in Canada, within 21 days after that service,
- (b) if you were served with the petition anywhere in the United States of America, within 35 days after that service,

16. Notice of this proceeding will be given to the Respondent by serving this petition and any supporting affidavits on the Respondent promptly following the filing of such documents.
17. The Petitioner is acting in good faith.
18. It is in the best interests of Lions Gate for the Proceeding to be prosecuted.
19. Such further and other grounds as counsel may advise.

**PART 3: LEGAL BASIS**

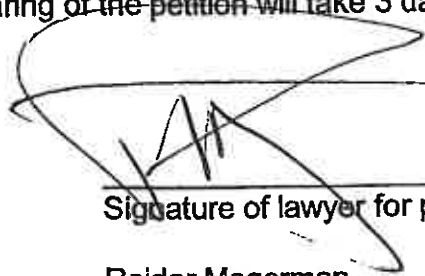
20. Sections 232 and 233 of the *BCBCA*.
21. Rules 2-1(2)(b), 14-1 and 16-1 of the *Supreme Court Civil Rules*.
22. Such further and other grounds as counsel may advise.

**PART 4: MATERIALS TO BE RELIED UPON**

23. Affidavit #1 of George Hopkins, sworn on October 1, 2014.
24. Such further and other materials as counsel may advise and this Honourable Court may permit.

The Petitioner estimates that the hearing of the petition will take 3 days.

Date: October 1, 2014



Signature of lawyer for petitioner

Reidar Mogerman

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680 Waterloo Street  
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Fax: (519) 660-7845

Email: dimitri.lascaris@siskinds.com

Place of trial: Vancouver Law Courts

---

Address of the registry: 800 Smithe Street, Vancouver, BC V6Z 2E1

Date: [dd/mmm/yyyy]

---

Signature of lawyer  
for plaintiff

Reidar Mogerman

---

**ENDORSEMENT ON ORIGINATING PLEADING OR PETITION FOR SERVICE  
OUTSIDE BRITISH COLUMBIA**

---

The Plaintiff claims the right to serve this pleading on the Defendants outside British Columbia on the grounds that:

- (a) this action concerns a tort committed in British Columbia, pursuant to section 10(g) of the *Court Jurisdiction and Proceedings Transfer Act*, SBC 2003, c 28; or
- (b) this action concerns a business carried on in British Columbia, pursuant to section 10(h) of the *Court Jurisdiction and Proceedings Transfer Act*, SBC 2003, c 28.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

FERNANDO ROSSY, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

MERGE HEALTHCARE, INC., MICHAEL  
W. FERRO, JR., JEFFERY A. SURGES,  
STEVEN M. ORESKOVICH and JUSTIN C.  
DEARBORN,

Defendants.

Civil Action No. 1:14-cv-0318

**JURY TRIAL DEMANDED**

**CONSOLIDATED AMENDED COMPLAINT**

WHEREFORE, Lead Plaintiff, on behalf of itself and the other members of the Class, prays for relief and judgment, including:

A. Determining that Counts I and II of this action constitute a proper class action under Federal Rules of Civil Procedure 23, certifying Lead Plaintiff as a Class representative under Rule 23 of the Federal Rules of Civil Procedure, and certifying Lead Plaintiff's counsel as Lead and Liaison Counsel for the Class;

B. Awarding compensatory damages in favor of Lead Plaintiff and the other Class members against all Defendants, jointly and severally, for all damages sustained as a result of Defendants' wrongdoing, in an amount to be determined at trial, including pre-judgment and post-judgment interest, as allowed by law;

C. Awarding extraordinary, equitable, and/or injunctive relief as permitted by law (including, but not limited to, rescission);

D. Awarding Lead Plaintiff and the other members of the Class their costs and expenses incurred in this action, including reasonable counsel fees and expert fees; and

E. Awarding such other and further relief as may be just and proper.

**JURY TRIAL DEMANDED**

Lead Plaintiff hereby demands a trial by jury on all triable claims.

Dated: May 28, 2014

Respectfully Submitted,

**LASKY & RIFKIND, LTD.**

*/s/ Norman Rifkind*

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Teacher Retirement System and the Class*

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*Lead Counsel for Lead Plaintiff Arkansas Teacher  
Retirement System and the Class*

Putative class member Arkansas Teacher Retirement System (“Arkansas Teacher”) hereby moves this Court for entry of an Order: (1) consolidating all related actions pursuant to Federal Rule of Civil Procedure 42(a); (2) appointing Arkansas Teacher as Lead Plaintiff pursuant to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(3)(B); (3) approving Arkansas Teacher’s selection of the law firm of Kessler Topaz Meltzer & Check, LLP (“Kessler Topaz”) as Lead Counsel and Lasky & Rifkind, Ltd. (“Lasky & Rifkind”) as Liaison Counsel; and (4) granting such other and further relief as the Court may deem just and proper.

In support of this Motion, Arkansas Teacher submits herewith the accompanying Memorandum of Law, the Declaration of Norman Rifkind, the prior pleadings and proceedings herein, and such other written or oral argument as may be permitted by the Court.

Dated: March 17, 2014

Respectfully Submitted,

**LASKY & RIFKIND, LTD.**

*/s/ Norman Rifkind*

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*Lead Counsel for Plaintiffs*  
[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

In re MGM MIRAGE SECURITIES LITIGATION	)	No. 2:09-cv-01558-GMN-VCF
	)	
	)	<u>CLASS ACTION</u>
	)	
This Document Relates To:	)	FIRST AMENDED COMPLAINT FOR
	)	VIOLATIONS OF FEDERAL SECURITIES
ALL ACTIONS.	)	LAWS
	)	

216. By reason of such conduct, the Insider Defendants are liable pursuant to §20(a) of the Exchange Act. As a direct and proximate result of the Insider Defendants' wrongful conduct, Lead Plaintiffs and the Class suffered damages in connection with their respective purchases of the Company's publicly-traded securities during the Class Period.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs pray for relief and judgment, as follows:

A. Determining that this action is a proper class action, designating Lead Plaintiffs as class representatives under Rule 23 of the Federal Rules of Civil Procedure and Lead Plaintiffs' counsel as Lead Class Counsel;

B. Awarding compensatory damages in favor of Plaintiffs and the other Class members against all Defendants, jointly and severally, for all damages sustained as a result of Defendants' wrongdoing, in an amount to be proven at trial, including interest thereon;

C. Awarding Plaintiffs and the Class their reasonable costs and expenses incurred in this action, including counsel fees and expert fees; and

D. Awarding all equitable and other relief as the Court may deem just and proper.

**JURY TRIAL DEMANDED**

Plaintiffs hereby demand a trial by jury on all claims and issues so triable.

Dated: April 17, 2012

Respectfully submitted,

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13 *Liaison Counsel for the Class*

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15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

17 CASE NO. 4:15-cv-05803-YGR

18  
19 **IN RE NIMBLE STORAGE, INC.**  
**SECURITIES LITIGATION**

**SECOND AMENDED CONSOLIDATED**  
**CLASS ACTION COMPLAINT**  
**FOR VIOLATIONS OF THE**  
**FEDERAL SECURITIES LAWS**

21 **LEAVE TO FILE GRANTED**  
22 **DECEMBER 9, 2016**

23 CLASS ACTION

24 Jury Trial Demanded

1 E. Granting such other and further relief as the Court deems just and proper.

2 **XV. JURY DEMAND**

3 Lead Plaintiff demands a trial by jury of all issues so triable.

4 Dated: January 20, 2017

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19 *Liaison Counsel*

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)

STEVEN KNURR, Individually and on Behalf of All Others Similarly Situated,	)	Civil Action No. 1:16-cv-01031-TSE-MSN
Plaintiff,	)	<u>CLASS ACTION</u>
vs.	)	
ORBITAL ATK, INC., et al.,	)	<u>DEMAND FOR JURY TRIAL</u>
Defendants.	)	

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LEAD PLAINTIFF'S AMENDED<sup>1</sup> COMPLAINT  
FOR VIOLATIONS OF THE FEDERAL SECURITIES LAWS

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<sup>1</sup> This Court previously granted in part and denied in part Defendants' motion to dismiss. Dkt. No. 77. This amended complaint realleges the dismissed claims for the purpose of preserving them for appeal. It also adds Hollis M. Thompson as a defendant in Counts I and II and provides additional support for the corporate scienter allegations relating to Orbital ATK. A redline can be made available, and, for ease of reference, the alleged false and misleading statements by Hollis M. Thompson are set forth in ¶¶79, 90, 96, 105, 111, and 117; supporting factual allegations were added in ¶¶22, 151, 161, 173, 186, 188, 216-224, and 228-230; and references to Hollis M. Thompson were added to existing allegations in ¶¶4, 6, 9, 23, 49-50, 56, 61, 150-151, 160, 162-163, 170, 172, 174, 179, 185, 187, 189, 199-200, 204, and 253-257.



301. By reason of such conduct, Thompson, Pierce, and DeYoung are liable pursuant to §20(a) of the Exchange Act.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs, on their own behalf and on behalf of the Class, pray for relief and judgment, as follows:

A. Declaring that this action is a proper class action and certifying Plaintiffs as Class representatives pursuant to Rule 23 of the Federal Rules of Civil Procedure and Robbins Geller Rudman & Dowd LLP as Class Counsel for the proposed Class;

---

B. Awarding compensatory damages in favor of Plaintiffs and other members of the Class against all Defendants, jointly and severally, for all damages sustained as a result of Defendants' wrongdoing, in an amount to be proven at trial, including interest thereon;

C. Awarding Plaintiffs and the Class their reasonable costs and expenses incurred in this action, including attorneys' fees and expert fees; and

D. Awarding Plaintiffs and other members of the Class such other and further relief, including any injunctive or other equitable relief, that may be deemed just and proper by the Court.

**JURY DEMAND**

Plaintiffs hereby demand a trial by jury.

DATED: October 10, 2017

THE OFFICE OF CRAIG C. REILLY  
CRAIG C. REILLY, VSB #20942

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*/s/ Craig C. Reilly*  
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Employees' Retirement System



Dated: October 11, 2016

Respectfully submitted,

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*Counsel for Arkansas Teacher Retirement  
System and Proposed Co-Lead Counsel for the  
Class*

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Teacher Retirement System and  
Plaintiff John A. Prokop and  
Lead Counsel for the Putative Class*

[Additional Counsel on Signature Page]

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

ARKANSAS TEACHER RETIREMENT  
SYSTEM and JOHN A. PROKOP,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiffs,

vs.

OSI SYSTEMS, INC., DEEPAK  
CHOPRA, ALAN EDRICK,  
and AJAY MEHRA

Defendants.

Case No. 17-cv-08841-VAP(SKx)

**CONSOLIDATED CLASS  
ACTION**

**CONSOLIDATED CLASS  
ACTION COMPLAINT FOR  
VIOLATIONS OF THE FEDERAL  
SECURITIES LAWS**

**DEMAND FOR JURY TRIAL**

Judge: Hon. Virginia A. Phillips

1 particular conduct and transactions giving rise to the securities violations as alleged  
2 herein, and exercised the same.

3 292. As set forth above, OSI and the Individual Defendants each violated  
4 Section 10(b) and Rule 10b-5 by their acts, statements and omissions as alleged in  
5 this Complaint. By virtue of their positions as controlling persons, the Individual  
6 Defendants are liable pursuant to Section 20(a) of the Exchange Act. As a direct and  
7 proximate result of Defendants' wrongful conduct, Plaintiffs and other members of  
8 the Class suffered damages in connection with their purchases of OSI Securities  
9 during the Class Period.

10 **XII. PRAYER FOR RELIEF**

11 WHEREFORE, Plaintiffs pray for judgment as follows:

12 A. Declaring this action to be a proper class action pursuant to Rule 23 of  
13 the Federal Rules of Civil Procedure;

14 B. Awarding Plaintiffs and the members of the Class damages and interest  
15 thereon;

16 C. Awarding Plaintiffs and the Class's reasonable costs, including  
17 attorneys' and experts' fees; and

18 D. Awarding such equitable, injunctive or other relief that the Court may  
19 deem just and proper.  
20

21 **XIII. JURY DEMAND**

22 Plaintiffs demand a trial by jury.  
23

24 DATED: May 4, 2018

Respectfully submitted,

25  
26 **KESSLER TOPAZ  
MELTZER & CHECK, LLP**

27 /s/ Eli R. Greenstein  
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*Liaison Counsel for the Putative Class*



1 Finally, Kiesel Law has substantial experience litigating complex class actions  
2 and is well qualified to represent the class as Liaison Counsel. *See* Zukin Decl., Ex.  
3 E.

4 Thus, the Court can be assured that the class will receive the highest caliber of  
5 legal representation should it approve Arkansas Teacher's selection of Kessler Topaz  
6 as Lead Counsel and Kiesel Law as Liaison Counsel for the class.

7 **IV. CONCLUSION**

8 For the reasons set forth above, Arkansas Teacher respectfully requests that  
9 the Court: (1) consolidate the above-captioned Related Actions; (2) appoint Arkansas  
10 Teacher as Lead Plaintiff; (3) approve Arkansas Teacher's selection of Kessler  
11 Topaz as Lead Counsel and Kiesel Law as Liaison Counsel for the class; and (4)  
12 grant such other relief as the Court may deem just and proper.

13 Dated: February 5, 2018

Respectfully submitted,

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13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

15 ARKANSAS TEACHER RETIREMENT  
16 SYSTEM, individually and on behalf of all  
17 others similarly situated,

18 Plaintiff,

19 v.

20 PROTHENA CORPORATION PLC, GENE  
21 G. KINNEY, TRAN B. NGUYEN, and  
22 SARAH NOONBERG,

23 Defendants.  
24  
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Case No.

COMPLAINT FOR VIOLATIONS OF  
THE FEDERAL SECURITIES LAWS

CLASS ACTION

JURY TRIAL DEMANDED

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13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15 ARKANSAS TEACHER RETIREMENT  
16 SYSTEM, individually and on behalf of all  
17 others similarly situated,

18 Plaintiff,

19 v.

20 PROTHENA CORPORATION PLC, GENE  
21 G. KINNEY, TRAN B. NGUYEN, and  
22 SARAH NOONBERG,

23 Defendants.  
24  
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Case No.

COMPLAINT FOR VIOLATIONS OF  
THE FEDERAL SECURITIES LAWS

CLASS ACTION

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12 Lead Counsel for Lead Plaintiff  
13 [Additional counsel appear on signature page.]

14 UNITED STATES DISTRICT COURT  
15 CENTRAL DISTRICT OF CALIFORNIA  
16 SOUTHERN DIVISION

17 In re QUALITY SYSTEMS, INC. ) No. 8:13-cv-01818-CJC-JPR  
18 SECURITIES LITIGATION ) CLASS ACTION  
19 \_\_\_\_\_ )  
20 This Document Relates To: ) JOINT STIPULATION TO STAY ALL  
21 ALL ACTIONS. ) PROCEEDINGS PENDING  
22 \_\_\_\_\_ ) APPROVAL OF SETTLEMENT

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DATED: May 15, 2018

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12 NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

13 IN RE RH, INC. SECURITIES  
14 LITIGATION,

Case No. 4:17-00554-YGR

ECF CASE

15 **CONSOLIDATED CLASS ACTION**  
16 **COMPLAINT FOR VIOLATIONS**  
17 **OF THE FEDERAL SECURITIES**  
18 **LAWS**

19 DEMAND FOR JURY TRIAL



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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE SCHERING-PLOUGH  
CORPORATION / ENHANCE SECURITIES  
LITIGATION

This Document Relates to:

ALL ACTIONS.

Lead Case No. 2:08-cv-00397 (DMC) (MF)  
(Securities Class Action)

CONSOLIDATED CLASS ACTION  
COMPLAINT FOR VIOLATIONS OF THE  
FEDERAL SECURITIES LAWS

**JURY TRIAL DEMANDED**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

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In re: SPECTRUM PHARMACEUTICALS,  
INC., SECURITIES LITIGATION

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)  
)  
) Case No. 2:13-cv-00433-LDG (CWH)  
) Base File  
)  
) JURY TRIAL DEMANDED  
)  
) CLASS ACTION  
)  
)

---

**CONSOLIDATED AMENDED CLASS ACTION COMPLAINT**

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**FILED**  
3/30/2018

MMA

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

*In re Stericycle, Inc. Securities Litigation*

Civ. A. No. 1:16-cv-07145  
Hon. Andrea R. Wood

CLASS ACTION

JURY TRIAL DEMANDED

ECF CASE

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**AMENDED CLASS ACTION COMPLAINT FOR VIOLATIONS OF  
THE FEDERAL SECURITIES LAWS**

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*Lead Counsel for Lead Plaintiffs the Public Employees' Retirement System  
of Mississippi and the Arkansas Teacher Retirement System*

UNITED STATES DISTRICT COURT  
DISTRICT OF KANSAS

WAYNE E. ANDERSON, Individually and on ) Behalf of All Others Similarly Situated, ) Plaintiff, ) vs. ) SPIRIT AEROSYSTEMS HOLDINGS, INC., ) JEFFREY L. TURNER, PHILIP D. ) ANDERSON, ALEXANDER K. KUMMANT, ) AND TERRY J. GEORGE, ) Defendants. )	Civil Action No. 2:13-cv-02261-EFM-TJJ <u>CLASS ACTION</u> CONSOLIDATED COMPLAINT FOR VIOLATIONS OF THE FEDERAL SECURITIES LAWS DEMAND FOR JURY TRIAL
---	--

A. Determining this action to be a proper class action, and certifying Lead Plaintiffs as Class representatives and Lead Plaintiffs' counsel as Class counsel under Rule 23 of the Federal Rules of Civil Procedure;

B. Awarding compensatory damages in favor of Lead Plaintiffs and the other members of the Class against all defendants, jointly and severally, for all damages sustained as a result of defendants' wrongdoing, in an amount to be proven at trial, including interest thereon;

C. Awarding Lead Plaintiffs and the Class their reasonable costs and expenses incurred in this action, including attorneys' fees and expert fees; and

D. Awarding such equitable, injunctive, or other and further relief as the Court may deem just and proper.

#### **XVI. JURY DEMAND**

Plaintiffs demand a trial by jury.

Dated: April 7, 2014

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Lead Counsel for Plaintiffs



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

ARKANSAS TEACHER )  
RETIREMENT SYSTEM, BOSTON )  
RETIREMENT SYSTEM, ROOFERS )  
LOCAL 149 PENSION FUND, )  
OKLAHOMA FIREFIGHTERS )  
PENSION AND RETIREMENT )  
SYSTEM, KBC ASSET )  
MANAGEMENT NV, ERSTE- )  
SPARINVEST )  
KAPITALANLAGEGESELLSCHAFT )  
M.B.H., STICHTING BLUE SKY )  
~~ACTIVE LARGE CAP EQUITY~~ )  
FUND USA, FELIX ROVELLI, and )  
AARON ROCKE, on behalf of )  
themselves and all other similarly )  
situated stockholders of TESLA )  
MOTORS, INC., and derivatively on )  
behalf of Nominal Defendant TESLA )  
MOTORS, INC., )  
)  
Plaintiffs, )  
)  
v. )  
)  
ELON MUSK, BRAD W. BUSS, )  
ROBYN M. DENHOLM, IRA )  
EHRENPREIS, ANTONIO J. )  
GRACIAS, STEPHEN T. )  
JURVETSON, and KIMBAL MUSK, )  
)  
Defendants, )  
)  
and )  
)  
TESLA MOTORS, INC., )  
)  
Nominal Defendant. )

C.A. No. 12740



- E. Ordering Elon Musk, Kimbal Musk, Gracias, Jurvetson and Buss to disgorge to the Company improper benefits they receive in connection with the Acquisition;
- F. Granting further appropriate equitable relief to remedy Defendants' breaches of fiduciary duty and unjust enrichment;
- G. Awarding to Plaintiffs the costs and disbursements of this action, including reasonable attorneys' fees, accountants' and experts' fees, costs and expenses; and
- H. Granting such other and further relief as the Court deems just and proper.

---

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

15 CV 3870

PAUL HELLER, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

VIPSHOP HOLDINGS LIMITED, YA SHEN,  
and DONGHAO YANG,

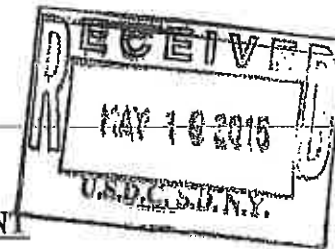
Defendants.

Case No.

CLASS ACTION

**JUDGE SWAIN**  
COMPLAINT FOR VIOLATION OF  
THE FEDERAL SECURITIES LAWS

DEMAND FOR JURY TRIAL



CLASS ACTION COMPLAINT

Plaintiff Paul Heller ("Plaintiff"), individually and on behalf of all other persons similarly situated, by his undersigned attorneys, for his complaint against defendants, alleges the following based upon personal knowledge as to himself and his own acts, and information and belief as to all other matters, based upon, *inter alia*, the investigation conducted by and through his attorneys, which included, among other things, a review of the defendants' public documents, conference calls and announcements made by defendants, United States Securities and Exchange Commission ("SEC") filings, wire and press releases published by and regarding Vipshop Holdings Limited, ("Vipshop" or the "Company"), analysts' reports and advisories about the Company, and information readily obtainable on the Internet. Plaintiff believes that substantial evidentiary support will exist for the allegations set forth herein after a reasonable opportunity for discovery.

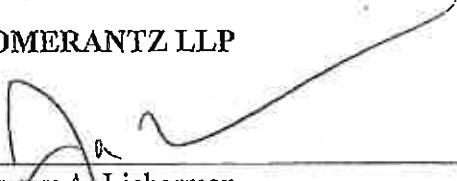
**DEMAND FOR TRIAL BY JURY**

Plaintiff hereby demands a trial by jury.

Dated: May 19, 2015

Respectfully submitted,

**POMERANTZ LLP**



---

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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE VIRTUS INVESTMENT  
PARTNERS, INC.  
SECURITIES LITIGATION

Case No. 15-cv-1249 (WHP)

**JURY TRIAL DEMANDED**

**ECF CASE**

**CONSOLIDATED CLASS ACTION COMPLAINT**

Dated: August 21, 2015

Respectfully submitted,

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14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA

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IN RE VOCERA COMMUNICATIONS,  
INC., SECURITIES LITIGATION

MASTER FILE NO. 3:13-cv-03567 EMC  
CONSOLIDATED CLASS ACTION  
COMPLAINT FOR VIOLATIONS OF  
THE FEDERAL SECURITIES LAWS  
JURY TRIAL DEMANDED

This Document Relates to:  
All Actions.

**REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED**

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DATED: September 19, 2014

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## 1 and 2 (b) Class Representative

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UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ARKANSAS TEACHER RETIREMENT  
SYSTEM, on behalf of itself and all others  
similarly situated,

Plaintiffs,

- against -

STATE STREET CORPORATION, STATE  
STREET BANK AND TRUST COMPANY and  
STATE STREET GLOBAL MARKETS, LLC,

Defendants.

No. 11-CV-10230 (MLW)

**AMENDED CLASS  
ACTION COMPLAINT**

Jury Trial Demanded

Plaintiff Arkansas Teacher Retirement System (“ARTRS”), individually and on behalf of all other similarly situated entities, by its undersigned attorneys, for its Amended Class Action Complaint against Defendants State Street Corporation, State Street Bank and Trust Company (“State Street Bank”), and State Street Global Markets, LLC (collectively, “State Street” or “Defendants”), alleges the following upon personal knowledge as to itself and its own acts, and upon information and belief as to all other matters.

**I. INTRODUCTION**

1. State Street was the custodian bank for ARTRS and the other institutional investors that constitute the Class. A custodian bank is an institution that holds securities on behalf of investors. The responsibilities entrusted to a custodian include the guarding and safekeeping of securities, delivering or accepting traded securities, and collecting principal, interest, and dividend payments on held securities. Custodians may also perform ancillary services for their clients. Custodians are typically used by institutional investors who do not

E. With regard to the Fifth Claim for Relief, that the Court find that Defendant State Street Bank breached each of its Custodian Contracts with Plaintiff, and award appropriate compensatory damages to Plaintiff in an amount to be determined at trial;

F. That the Court award Plaintiff and the Class all costs and expenses of this action, including reasonable attorneys' and experts' fees; and

G. That the Court award Plaintiff and the Class such other relief as the Court deems just and proper.

---

**Demand for Jury Trial**

Plaintiff demands a trial by jury of all issues so triable.

Dated: April 15, 2011

THORNTON & NAUMES, LLP

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE SUNEDISON, INC.  
SECURITIES LITIGATION

This Document Applies To:

*Horowitz et al. v. SunEdison, Inc. et al.*,  
1:16-cv-07917-PKC

Case No. 1:16-md-2742-PKC

**JURY TRIAL DEMANDED**

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**SECOND AMENDED CONSOLIDATED SECURITIES CLASS ACTION COMPLAINT**

**XV. Prayer For Relief**

WHEREFORE, Plaintiffs pray for judgment individually and on behalf of the Class, as follows:

- a) Declaring this action to be a proper class action pursuant to Rule 23 of the Federal Rules of Civil Procedure;
- b) Awarding Plaintiffs and the Class members damages, including interest;
- c) Awarding Plaintiffs reasonable costs, including attorneys' and experts' fees; and
- d) Awarding such equitable/injunctive or other relief for the benefit of the Class as the court may deem just and proper.

---

**XVI. Jury Demand**

Plaintiffs demand a trial by jury for all issues so triable.

DATED: March 17, 2017

*/s/ Salvatore J. Graziano*

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*Counsel for Lead Plaintiff Municipal  
Employees' Retirement System of Michigan,  
Named Plaintiff the Arkansas Teacher  
Retirement System, and Lead Counsel for the  
Class*

1 and 2 (c) Other

---

---

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS

SUSAN CROSBY

PLAINTIFF

VS.

NO. 60-CV-12-4539

THE ARKANSAS TEACHER RETIREMENT  
SYSTEM

DEFENDANT

ANSWER TO COMPLAINT

---

Defendant Arkansas Teacher Retirement System ("ATRS") for its answer to plaintiff's complaint:

1. Admits that plaintiff is a resident of Pulaski County, Arkansas and was formerly employed by defendant.

2. Admits that George Hopkins is the Executive Director of ATRS; that ATRS was created by the state legislature; that \_\_\_\_; that at the time of plaintiff's termination Dr. Richard Abernathy was the Executive Director of the ATRS Board and that the individuals named in paragraph 2(d) of the complaint were members of the Board. States that to the extent paragraph 2 of the complaint contains legal conclusions, no response is required.

3. Admits that jurisdiction and venue are proper.

4. Denies that the parties mediated pursuant to A.C.A. 21-1-604(f)(2) and denies that plaintiff made a timely request for such mediation, but admits that the parties participated in a private mediation prior to the filing of plaintiff's complaint. Denies the remaining allegations contained in paragraph 4 of the complaint.

5. Admits that Hopkins knew plaintiff socially prior to her hire.



DUSTIN MCDANIEL  
Attorney General

By: /s/ Lori Freno, Sr. Asst. Attorney General  
Arkansas Bar Number 97042  
ARKANSAS ATTORNEY GENERAL'S  
OFFICE  
323 Center Street, Suite 200  
Little Rock, AR 72201  
(501) 682-1314  
E-mail: lori.freno@arkansasag.gov

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Attorneys for Defendants

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**CERTIFICATE OF SERVICE**

I hereby certify that on March \_\_, 2013, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send notification of such filing to the following:

Lloyd W. Kitchens, III - *lkitchens@bradhendricks.com*

/s/ Michelle M. Kaemmerling

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
WESTERN DIVISION

SUSAN CROSBY

PLAINTIFF

v.

Case No. 4:11-CV-638 JLH

GEORGE HOPKINS, *et al.*,

DEFENDANTS

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DEFENDANTS' MOTION TO DISMISS

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~~For their Motion to Dismiss, defendant Arkansas Teacher~~

Retirement System, as well as defendants George Hopkins, Robin Nichols, Donna Morey, Janelle Riddle, Beverly Leming, Dr. Richard Abernathy, Jeff Stubblefield, David Cauldwell, Hazel Coleman, Lloyd Black, and Bobby Lester, in both their official and individual capacities, set forth the following:

1. Plaintiff's Complaint set forth no factual foundation to support her claims against defendant Board of Trustee members.
2. Plaintiff's Complaint set forth an insufficient factual foundation to support her claims against defendants Arkansas Teacher Retirement System and George Hopkins.
3. The Arkansas Teacher Retirement System is absolutely immune from suit for actions brought under 42 U.S.C. § 1983.

dismissed because they are not “public employers” as defined by the Act.

11. Plaintiff’s state law wrongful discharge claim must be dismissed because the Arkansas Teacher Retirement System and official-capacity defendants are absolutely immune from suit in federal court regarding this claim. Her claim against the individual-capacity actors also must be dismissed because there was no employment contract between plaintiff and these individuals, and also because plaintiff was not terminated in violation of any well-established policy of the State.

For the foregoing reasons, the defendants respectfully request that this Court dismiss the present Complaint in its entirety pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), and for all other relief that is just and proper.

Respectfully submitted,

DUSTIN McDaniel  
Attorney General

By: /s/ Lori Freno, Sr. Asst. Attorney General  
Arkansas Bar Number 97042  
Arkansas Attorney General’s Office  
323 Center Street, Suite 200  
Little Rock, AR 72201  
(501) 682-1314  
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/s/ Michelle M. Kaemmerling  
Michelle M. Kaemmerling (2001227)  
Jane A. Kim (2007160)  
WRIGHT, LINDSEY & JENNINGS LLP  
200 West Capitol Avenue, Suite 2300  
Little Rock, Arkansas 72201-3699  
(501) 371-0808  
Fax: (501) 376-9442  
E-mail: mkaemmerling@wlj.com, jkim@wlj.com

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Attorneys for defendants

---

**CERTIFICATE OF SERVICE**

I hereby certify that on September 27, 2011, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send notification of such filing to the following:

Lloyd W. Kitchens, III  
tkitchens@bradhendricks.com  
amurray@bradhendricks.com  
clewis@bradhendricks.com

There are no persons to be notified manually.

/s/ Lori Freno

IN THE CIRCUIT COURT OF MILLER COUNTY, ARKANSAS  
PROBATE DIVISION

In The Matter of the Estate of )  
Shirley P. Gamble, Deceased )

No. 46PR-15-234-2

PETITION FOR APPOINTMENT OF ADMINISTRATOR

Arkansas Teacher Retirement System (ATRS), whose address is 1400 West Third Street, Little Rock, Arkansas 72201, and whose interest in the decedent's estate is that of creditor, petitions that letters of administration of the estate be issued. The facts known to petitioner are:

1. The decedent, Shirley P. Gamble, aged 74, who resided at 10 Preston Circle in Texarkana, Miller County, Arkansas, died intestate in Atlanta, Georgia on or about February 10, 2015.
2. ATRS is an agency of the State of Arkansas and is one of five state-support retirement systems in Arkansas. ATRS provides retirement, disability, and survivor benefits to employees of Arkansas public schools and educationally related public agencies.
3. At the time of her death, the decedent, Shirley P. Gamble, was receiving a monthly benefit from ATRS which was deposited directly into a bank account at Hibernia National Bank per her request.
4. Ms. Gamble's right to receive a benefit ceased the month after her death. ATRS was not notified of Ms. Gamble's death and her estate continued to receive a monthly benefit by direct deposit to the decedent's bank account.
5. Upon learning of her death, ATRS immediately stopped payments. The amount due to ATRS as a result of the erroneous payments total \$15,147.15.

6. The sole heir of the decedent, and his respective age, relationship to the decedent, and residence address, are:

Name	Age	Relationship	Residence Address
George Gamble, Jr.	Over 21 years of age	Son	720 James Madison Drive Atlanta, Georgia 30331

7. The sole heir, George Gamble, Jr., withdrew the benefits erroneously paid to the decedent and has verbally agreed to repay the balance of \$15,147.15 on behalf of the estate and himself, but has failed to do so.
8. The probable value of the decedent's estate is:

Real property: \$109,050.00

Personal property: Unknown

9. The real property of the Estate consists of a single family residence and all of one lot and parts of two other adjoining lots upon which the residence is located, and is commonly known as 8 and 10 Preston Circle, Texarkana, Arkansas, and more fully described as follows:

North Seventy-One Feet (N 71') of Lot Numbered Four (4), Lot Numbered (5), and the South One Foot (S '1) of Lot Numbered Six (6) in Block numbered Two (2) of PRESTON STREET HEIGHTS ADDITION to the City of Texarkana, Miller County, Arkansas.

10. A limited title search of the real property indicates that Texar Federal Credit Union holds an unsatisfied mortgage on part of the real property as recorded on Book 2006, Page 5690 on March 21, 2006, and as such stands as a creditor of the Estate.
11. 2014 Miller County Real Estate Property Taxes are delinquent on a portion of the real property described above as described in Parcel number 465-303-0, as well as 2014 Miller County Personal Property Taxes as described in Parcel Number 0000380.
12. Petitioner nominates the Trust & Asset Management Division of Farmers Bank & Trust, whose address is 200 East Main Street, Magnolia, Arkansas 71754, for appointment as administrator of the estate. ATRS requests that Farmer's Bank & Trust be allowed to serve without bond.

THEREFORE, petitioner requests that this court make an order determining the fact of the death and of the intestacy of the decedent, and appointing Petitioner's nominee administrator of the estate.

Respectfully submitted,

ARKANSAS TEACHER RETIREMENT SYSTEM  
1400 West Third St.  
Little Rock, Arkansas 72201  
Tel: (501) 682-3332  
Fax: (501) 682-2359  
martham@artrs.gov

By:   
Martha Miller 78109  
Staff Attorney

STATE OF ARKANSAS  
COUNTY OF Pulaski

FILED  
NOV 12 2019  
MILLER COUNTY CLERK  


IN THE CIRCUIT COURT OF GARLAND COUNTY, ARKANSAS  
FIRST DIVISION

FILED

MICHAEL IHRIE and DEA ANN RICHARD, his wife

2016 OCT 14 PM 5:58

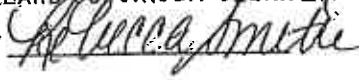
vs.

No. CV-2015-607

JEANNIE PIKE  
GARLAND CO. CIRCUIT CLERK

THE KROGER CO. d/b/a K025 KROGER EAST DELTA  
KROGER LIMITED PARTNERSHIP I;  
PIONEER GENERAL CONTRACTORS, INC.  
ARKANSAS TEACHER RETIREMENT SYSTEM;  
ARKANSAS INDUSTRIAL ROOFING, INC.;

BY



AAON, INC.;

JOHN DOE 1; JOHN DOE 2; JOHN DOE 3;

JOHN DOE 4; JOHN DOE 5

DEFENDANTS

ENTRY OF APPEARANCE

COMES NOW the separate defendant, Arkansas Teacher Retirement System, and serve notice on the parties and the Court, that James D. Burns of the Laser Law Firm, P.A. hereby enters his appearance in the above styled action as counsel for Separate Defendant.

Respectfully submitted,  
LASER LAW FIRM, P.A.  
101 S. Spring Street, Suite 300  
Little Rock, Arkansas 72201-2488  
(501) 376-2981

BY: 

JAMES D. BURNS  
BAR ID #2006-175  
e-mail: [jburns@laserlaw.com](mailto:jburns@laserlaw.com)

CERTIFICATE OF SERVICE

I, James D. Burns, hereby certify that a copy of the above and foregoing pleading has been served on all attorneys of record as listed below this 12th day of October, 2016 Via Court Connect:.

Jay Bequette  
Bequette & Billingsley, PA  
425 West Capitol Ave., Ste 3200  
Little Rock, AR 72201  
[jbequette@bbpalaw.com](mailto:jbequette@bbpalaw.com)

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Michael Vanderford  
Anderson, Murphy & Hopkins, LLP  
400 West Capitol Ave, Ste 2400  
Little Rock, AR 72201  
[vanderford@amhfirm.com](mailto:vanderford@amhfirm.com)

  
James D. Burns



IN THE CIRCUIT COURT OF PULASKI COUNTY  
CIVIL DIVISION

LINDA LANCE

PETITIONER

VS

60CV-17-74

ARKANSAS TEACHER RETIREMENT SYSTEM

RESPONDENT

**RESPONDENT'S RESPONSE TO PETITIONER'S  
PETITION FOR JUDICIAL REVIEW**

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COMES NOW the Respondent, Arkansas Teacher Retirement System (ATRS), and in response to Petitioner's Petition for Judicial Review, states:

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1. Respondent admits that Petitioner has been a member of ATRS since 1983, but lacks sufficient information to admit or deny the remaining allegations contained in Paragraph 1 of the Petition.
2. Respondent admits the allegations contained in Paragraph 2 of the Petition.
3. Respondent admits the allegations contained in Paragraph 3 of the Petition.
4. Respondent admits the allegations contained in Paragraph 4 of the Petition.
5. Respondent admits that the Director of ATRS issued a review of a Staff Determination regarding a proposed Qualified Domestic Relations Order concerning Petitioner's ATRS benefits on February 15, 2016, but denies Petitioner's characterization of the review.
6. Respondent denies the allegations as characterized by the Petitioner. In the Director's Review of the Staff Determination, the Director specifically found that the 2008 amended QDRO, which was provided to ATRS on April 1, 2015, was inconsistent with the terms of the ATRS Plan and therefore not a qualified order; that a previously submitted QDRO had been reviewed and accepted by ATRS in 2006; and that this

13. Respondent denies that it has violated any law in fulfilling its statutory responsibility under A.C.A. § 9-18-103(b)(2)(B)(ii) in reviewing and rejecting as "unqualified" the 2008 QDRO. Respondent asserts that the remaining assertions and conclusions of Paragraph 13 are speculative, and ATRS lacks sufficient information to admit or deny such conjecture.

14. Respondent denies the allegations contained in Paragraph 14 of the Petition.

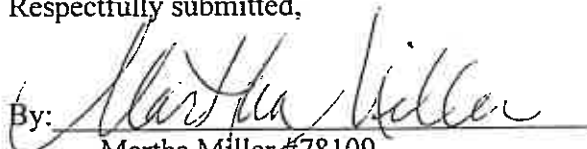
Respondent further affirmatively states that the judicial review under the Administrative Procedures Act is by the court without a jury and is confined to the administrative record, and the Petitioner has failed to establish a basis for relief under the APA, specifically A.C.A. § 25-15-212 (h).

15. Respondent denies the allegations contained in Paragraph 15 of the Petition.

16. Respondent denies each and every material allegation of the Petition not specifically admitted in this Response.

WHEREFORE, Respondent prays that the Petition be denied and dismissed; for costs, attorneys' fees and for all other just and proper relief to which it may be entitled.

Respectfully submitted,

By:   
Martha Miller #78109  
Arkansas Teacher Retirement System  
1400 West Third Street  
Little Rock, AR 72201

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing pleading was served on the 31<sup>st</sup> day of May 2017, *via* U.S. Mail, postage prepaid, as well as an electronic email, to the following:

James Andrew Marshall, Esq.  
P. O. Box 1548  
Conway, AR 72034  
[Andymarshall915@gmail.com](mailto:Andymarshall915@gmail.com)

  
Martha Miller

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

LYONDELL CHEMICAL COMPANY, et al.,

Debtors.

EDWARD S. WEISFELNER, AS TRUSTEE OF  
THE LB CREDITOR TRUST,

Plaintiff,

-against-

FUND 1, et al.,

Defendants.

Case No. 09-10023 (REG)

Chapter 11

(Jointly Administered)

Adv. Pro. No. 10-4609 (REG)

**NOTICE OF VOLUNTARY DISMISSAL**

**PLEASE TAKE NOTICE** that, pursuant to Federal Rule of Civil Procedure 41(a), made applicable to this action by Rule 7041 of the Federal Rules of Bankruptcy Procedure, plaintiff hereby dismisses this action solely against defendant, Pension Fund 28, without prejudice.

September 4, 2014

Writer's Direct Number: 614 462-2225  
Direct Fax: 614 224-3568  
Internet: Daniel.Swetnam@icemiller.com

**VIA EMAIL AND REGULAR MAIL**

Sigmund S. Wissner-Gross, Esq.  
Brown Rudnick LLP  
Seven Times Square  
New York, NY 10036

---

**Re: Edward S. Weisfelner, as Trustee of the LB Creditor Trust v. Fund 1, et al.,**  
**Adv. Pro. No. 10-4609 (the "Fund I Action")**

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Dear Mr. Wissner-Gross:

This firm is counsel to Arkansas Teacher Retirement System ("ATRS"), identified as Pension Fund 28 in the Fund I Action. In accordance with the Protocol to Address Alleged Domestic Sovereign Immunity Defenses, enclosed herewith is an Affidavit of George Hopkins, the Executive Director of ATRS, which includes the sovereign immunity analysis of ATRS. Based on the enclosed items, we believe that ATRS should be dismissed from the Fund 1 action based on sovereign immunity.

Please let me know if you have any questions concerning these items.

Very truly yours,

ICE MILLER LLP  


Daniel R. Swetnam

DRS/dw  
Enclosures

**IN THE CIRCUIT COURT OF ST. FRANCIS COUNTY, ARKANSAS**

**PALESTINE-WHEATLEY SCHOOL DISTRICT**

**FILED PLAINTIFF**

**VS. CASE NO. 62CV-12-253-2**

**JAN 30 2013**

**GEORGE HOPKINS, as Executive Director of  
The Arkansas Teacher Retirement System,  
THE ARKANSAS TEACHER RETIREMENT SYSTEM, and  
BOBBIE FINGERS**

TIME \_\_\_\_\_ M  
**BETTE S. GREEN, CLERK  
ST. FRANCIS COUNTY**

**DEFENDANT**

**ANSWER TO COMPLAINT**

Come Defendants, George Hopkins, as Executive Director of the Arkansas Teacher Retirement System and Arkansas Teacher Retirement System ("ATRS") and for their Answer to Complaint of Plaintiff Palestine-Wheatley School District state:

1. Defendants lack sufficient information to admit or deny the allegations contained in Paragraph 1 of Complaint.
2. Defendants admit the allegations contained in Paragraph 2 of the Complaint.
3. Defendants state that the correct invocation of Arkansas Code for jurisdiction of this matter is Ark. Code Ann. § 25-15-212, but otherwise admit the allegations contained in Paragraph 3 of the Complaint.
4. Defendants lack sufficient information to admit or deny the allegations contained in Paragraph 4 of the Complaint.
5. Defendants admit the allegations contained in Paragraph 5 of the Complaint.
6. Regarding Paragraph 6 of the Complaint, ATRS was not at any time a party to the lawsuit cited between Ms. Fingers and Palestine Wheatley School District nor did ATRS participate in any capacity in the lawsuit or settlement between Ms. Fingers and Palestine Wheatley School District. To the extent that such assertions,

extent that such assertions, conclusions, and facts are alleged by the Plaintiff in the Complaint, ATRS lacks sufficient information to admit or deny.

17. Defendants deny each and every material allegation of the Complaint not specifically admitted in this Answer.


18. Defendants state that the Complaint fails to state facts upon which relief can be granted to Plaintiff.

19. Defendants reserve the right to file an amended answer and otherwise plead in this action.

WHEREFORE, Defendants pray that the Complaint be denied and dismissed; for costs, attorneys' fees and for all other just and proper relief to which it may be entitled.

Respectfully submitted,

By:

  
\_\_\_\_\_  
Laura M. Gilson # 85094  
General Counsel  
Arkansas Teacher Retirement System,  
1400 West Third Street  
Little Rock, AR 72201

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the 30<sup>th</sup> day of January, 2013, via U. S. Mail, postage prepaid, upon the following:

William Clay Brazil, Esq.  
Brazil, Adlong, Winingham, Mickel PLC  
1315 Main St.  
Conway, Arkansas 72034