

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

ALBERT L. GRAY, Administrator, et al., :
Plaintiffs, :
 :
vs. : C.A. No. 04-312L
 :
JEFFREY DERDERIAN, et al., :
Defendants. :

NOTICE OF SETTLEMENT – McLAUGHLIN & MORAN, INC.

Counsel for the Gray Plaintiffs, and counsel for Defendant McLaughlin & Moran, Inc. wish to advise the Court that a settlement in principle has been reached for consideration of 16 million dollars.

Plaintiffs' counsel in all pending Station Fire Cases¹ have agreed to this settlement of claims against McLaughlin & Moran, Inc. This settlement is expressly subject to: (1) approval of all Plaintiffs; (2) execution of mutually acceptable settlement and release agreements by all Plaintiffs, which shall include satisfactory release and indemnity language preserving Plaintiffs' claims against the remaining non-settling Defendants, and protecting settling Defendant against cross-claims from any other Defendant; (3) approval of this settlement by the Court; (4) approval by the Court of the

¹ All Station Fire Plaintiffs in the cases of Gray, et al. v. Derderian, et al., C.A. No. 04-312L; Napolitano, et al. v. Derderian, et al., C.A. No. 06-80L; Passa, et al. v. Derderian, et al., C.A. No. 03-148L; Kingsley, et al. v. Derderian, et al., C.A. No. 03-208L; Guindon, et al., v. American Foam Corp., et al., C.A. No. 03-335L; Henault, et al. v. American Foam Corp., et al., C.A. No. 03-483L; Roderiques, et al. v. American Foam Corp., et al., C.A. No. 04-026L; Sweet, et al. v. American Foam Corp., et al., C.A. No. 04-056L; Paskowski, et al. v. Derderian, et al., C.A. No. 05-002L; Kolasa v. American Foam Corp., et al., C.A. No. 05-070L; Long v. American Foam Corporation, C.A. No. 06-047L; Malagrino v. American Foam Corp., et al., C.A. No. 06-002L; and Gonsalves v. Derderian, et al., C.A. No. 06-076L.

allocation plan being developed by the Special Master; and (5) successful defense of any challenge by any party in any action set forth in Footnote 1 to the constitutionality of the Rhode Island Uniform Contribution Among Tortfeasors Act (R.I.G.L. § 10-6-1, et seq.), as amended.

Plaintiffs #1 through #11, inclusive, #12b, #13a, b, and c, #14 through #16, inclusive, #80 through #132, inclusive, #222; #223, and #242 through #248, inclusive,
By their Attorneys,

/s/ Patrick T. Jones

/s/ Peter J. Schneider

Patrick T. Jones, Esq. (#6636)
Peter J. Schneider, Esq. (#6834)
Cooley Manion Jones LLP
21 Custom House Street
Boston, MA 02110
Tel.: 617-737-3100
Fax: 617-737-3113
[email: pjones@cmjlaw.com]
[email: pschneider@cmjlaw.com]

Plaintiffs #13d and e, #17 through #63, inclusive, #133 through #190, inclusive, #225 through #233, inclusive, # 240, and #251 through #257, inclusive, and the Napolitano plaintiffs,
By their Attorney,

/s/ Mark S. Mandell

Mark S. Mandell, Esq. (#0502)
Mandell, Schwartz & Boisclair, Ltd.
One Park Row
Providence, RI 02903
Tel.: 401-273-8330
Fax: 401-751-7830
[email: msmandell@msb.com]

Plaintiffs #13d and e, #17 through #63, inclusive, #133 through #190, inclusive, #225 through #233, inclusive, # 240, and #251 through #257, inclusive, and the Napolitano plaintiffs,
By their Attorneys,

/s/ Max Wistow

/s/ John P. Barylick

Max Wistow, Esq. (#0330)
John P. Barylick, Esq. (#1907)
Wistow & Barylick Incorporated
61 Weybosset Street
Providence, RI 02903
Tel.: 401-831-2700
Fax: 401-272-9752
[email: mw@wistbar.com]
[email: jpb@wistbar.com]

Plaintiffs #65b, #71 through #75, inclusive, #197 through #214, inclusive, #224; #234 through #237, inclusive, #260 through #262, inclusive, #265 and #266,
By their Attorney,

/s/ Michael A. St. Pierre

Michael A. St. Pierre, Esq. (#2553)
Revens, Revens & St. Pierre, P.C.
946 Centerville Road
Warwick, RI 02886
Tel.: 401-822-2900
Fax: 401-826-3245
[email: mikesp@rrsplaw.com]

Plaintiffs #64, #65a, #66 through #68,
inclusive, #192 through #195 inclusive, and
#241,
By their Attorney,

/s/ Stephen E. Breggia

Stephen E. Breggia, Esq. (#2865)
Breggia, Bowen & Grande
395 Smith Street
Providence, RI 02908
Tel.: 401-831-1900
Fax: 401-831-0129
[email: sbreggia@bbglaw.us]

Plaintiffs #12a, #76 through #79, inclusive,
#215 through #221, inclusive, #238, #258,
#259, #263, and #264,
By their Attorney,

/s/ Steven A. Minicucci

Steven A. Minicucci, Esq. (#4155)
Calvino Law Associates
373 Elmwood Avenue
Providence, RI 02907
Tel.: 401-785-9400
Fax: 401-941-1550
[email: sminicucci@calvinolaw.com]

Plaintiffs #69; #70; #196, #249, and #250,
By their Attorney,

/s/ Eva-Marie Mancuso

Eva-Marie Mancuso, Esq. (#3564)
Hamel, Waxler, Allen & Collins
387 Atwells Avenue
Providence, RI 02909
Tel.: 401-455-3800
Fax: 401-455-3806
[email: emancuso@hwac.com]

Plaintiffs #191 and #239,
By their Attorney,

/s/ Charles N. Redihan, Jr.

Charles N. Redihan, Jr., Esq. (#1810)
Kiernan, Plunkett & Redihan
91 Friendship Street
Providence, RI 02903
Tel.: 401-831-2900
Fax: 401-331-7123
[email: credihan@kprlaw.com]

Defendant McLaughlin & Moran, Inc.,
By its Attorneys,

/s/ Howard A. Merten

Howard A. Merten (#3171)
Robert K. Taylor (#6514)
Partridge, Snow & Hahn LLP
180 South Main Street
Providence, RI 02903
Tel: 401-861-8200
Fax: 401-861-8210
[e-mail: hm@psh.com]

CERTIFICATION

I hereby certify that an exact copy of the within document was electronically submitted to the Electronic Case Filing System of the United States District Court for its distribution to all counsel of record and a copy was electronically mailed to *pro se* defendant on this 23rd day of May, 2008.

Adam J. Combies, Esq.	acombies@piercedavis.com
Andrew J. Trevelise, Esq.	atrevelise@reedsmith.com
Ann Songer, Esq.	stationfire@shb.com
Anthony F. DeMarco, Esq.	tdemarco@conversent.net
B. Jon Enciso	jenciso@legalmgt.com
Benjamin V. White, III, Esq.	bwhite@vetterandwhite.com
Bennett R. Gallo, Esq.	brg@ndqrb.com
Brian Cunha, Esq.	brian@Briancunha.com
Bruce P. Keller, Esq.	bkeller@debevoise.com
Bruce G. Tucker, Esq.	btucker@legalmgt.com
C. Russell Bengtson, Esq.	rbengtson@ckmlaw.com
Carl A. Henlein, Esq.	chenlein@fbtlaw.com
Charles Babcock, Esq.	cbabcock@jw.com
Charles N. Redihan, Jr., Esq.	credihan@kprlaw.com
Christopher C. Fallon, Jr., Esq.	cfallon@cozen.com
Curtis R. Diedrich, Esq.	cdiedrich@sloanewalsh.com
Daniel Horgan, Esq.	horganlaw@snet.net
Daniel P. McKiernan, Esq.	danielpmckiernan@yahoo.com
David D. Langfitt, Esq.	dlangfitt@mmwr.com
David E. Maglio, Esq.	dmaqlio@magliolaw.com
David T. Mitrou, Esq.	dmitrou@mccormackfirm.com
David A. Wollin, Esq.	dwoillin@apslaw.com
Deborah Solmor, Esq.	dsolmor@skadden.com
Dennis J. Roberts, II, Esq.	droberts@djrlaw.com
Donald J. Maroney, Esq.	dmaroney@kkrs.com
Earl H. Walker, Esq.	ewalker@jw.com
Edward M. Crane, Esq.	ecrane@skadden.com
Edward T. Hinchey, Esq.	ehinchey@sloanewalsh.com
Edwin F. McPherson, Esq.	emcpherson@m-klaw.com
Eric B. DiMario, Esq.	edimario@gunninglafazia.com
Eric Bradford Hermanson, Esq.	ehermanson@choate.com
Esquire Litigation Solutions LLC	stationfire@esquirecom.com
Eva Marie Mancuso, Esq.	emancuso@hwac.com
Fred A. Kelly, Jr., Esq.	stationfirelitigation@nixonpeabody.com
Frederick B. Tedford, Esq.	ftedford@tedfordhenry.com
George E. Wolf, III, Esq.	stationfire@shb.com
Georgia Sullivan, Esq.	georgia.sullivan@thehartford.com
Henry M. Swan, Esq.	hms@dksblaw.com
Howard Julian	sohohomes@yahoo.com
Howard A. Merten, Esq.	hm@psh.com
J. Renn Olenn, Esq.	mkd@olenn-penza.com

James K. Archibald, Esq.	jima@wmtburnett.com
James A. Bigos, Esq.	jim@b-plaw.com
James S. D'Ambra, Esq.	ricedolan@ricedolan.com
James E. Kelleher, Esq.	jamesk@rrsplaw.com
James R. Lee, Esq.	ilee@riag.ri.gov
James C. Martin, Esq.	jmartin@reedsmith.com
James T. Murphy, Esq.	stationfire@hansoncurran.com
James H. Reilly, III, Esq.	jreilly@kkrs.com
James J. Restivo, Jr., Esq.	jrestivo@reedsmith.com
James A. Ruggieri, Esq.	jruggieri@hcc-law.com
Jennifer A. Creedon, Esq.	stationlitigation@cetcap.com
Joel F. Pierce, Esq.	jpierce@piercedavis.com
John H. Brooke, Esq.	jbrooke@brookemawhorr.com
John A. Caletri, Esq.	jcaletri@melicklaw.com
John J. Cloherty, III	jcloherty@piercedavis.com
John R. Crockett, III, Esq.	jcrockett@fbtlaw.com
John J. Doody, Esq.	doody@lbbslaw.com
John J. Flanagan, Esq.	jflanagan@torti.com
John G. Hines, Esq.	hines-patz@conversent.net
John R. Mahoney, Esq.	johnmahoney@amlawllp.com
John F. Murphy, Esq.	stationfire@shb.com
John J. Nazzaro, Esq.	attynazzaro@aol.com
Joseph H. Aronson, Esq.	jaronson@mccormackfirm.com
Joseph J. Bellew, Esq.	jbellew@cozen.com
Joseph B. Burns, Esq.	jburns@rms-law.com
Joseph V. Cavanagh, Jr., Esq.	stationfire@blishcavlaw.com
Joseph Krowski, Esq.	josephkrowski.law@verizon.net
Josh M. Greenbaum, Esq.	jgreenbaum@cozen.com
Judith A. Perritano, Esq.	jperritano@piercedavis.com
Karen A. Alegria, Esq.	karen@BrianCunha.com
Karen K. Corcoran, Esq.	karen@desistolaw.com
Kate B. Harden, Esq. for J.Renn Olenn	kbh@olenn-penza.com
Kathleen C. Henry, Esq.	khenry@choate.com
Kathleen M. Daniels, Esq.	kathleen@desistolaw.com
Kelly N. Michels, Esq.	stationfire@hansoncurran.com
Kevin F. Bowen, Esq.	kbowen@bbqlaw.us
Kevin R. Powers, Esq.	kpowers@cetcap.com
Kim M. Clarke, Esq.	kclarke@nixonpeabody.com
Kristin E. Rodgers, Esq.	stationfire@blishcavlaw.com
Kyle E. Bjornlund, Esq.	kbjornlund@cetcap.com
Lauren D. Wilkins, Esq.	lwilkins@smithbrink.com
Lawrence J. Cappuccio, Esq.	l.cappuccio@worldnet.att.net
Lawrence G. Cetrulo, Esq.	stationlitigation@cetcap.com
Lisa A. Pinsonneault, Esq.	lpinsonneault@straussfactor.com
Marc DeSisto, Esq.	stationfire@desistolaw.com
Mark D. Cahill, Esq.	mcahill@choate.com
Mark P. Dolan, Esq.	ricedolan@ricedolan.com
Mark Hadden, Esq.	mhadden@mhaddenlaw.com

Mark S. Mandell, Esq. msb@msb-atty.com
Mark T. Nugent, Esq. mnugent@morrisonmahoney.com
Mark Parsky, Esq. mep@mcveyparsky-law.com
Mark T. Reynolds, Esq. mtreynolds@conversent.net
Mark R. Ter Molen, Esq. mtermolen@mayerbrownrowe.com
Mark D. Tourgee, Esq. aminchillo@itwlaw.com
Matthew F. Medeiros, Esq. mfm@lmkbw.com
Meghan H. Sullivan, Esq. meghan.sullivan@lw.com
Michael A. DeSisto, Esq. michael@desistolaw.com
Michael R. DeLuca, Esq. mrd@gsm-law.com
Michael J. Mazurczak, Esq. stationlitigation@melicklaw.com
Michael J. McCormack, Esq. mmccormack@mccormackfirm.com
Michael Potenza, Esq. mpotenza@debevoise.com
Michael A. St. Pierre, Esq. mikesp@rrsplaw.com
Michael G. Sarli, Esq. mgs@gsm-law.com
Nancy W. Hamilton, Esq. nhamilton@jw.com
Patrick T. Jones, Esq. pjones@cmjlaw.com
Paul Sullivan, Esq. pvsullivan@morrisonmahoney.com
Peter Resnik, Esq. presnik@mwe.com
Peter Schneider, Esq. pschneider@cmjlaw.com
Rajaram Suryanarayan, Esq. rsury@qunninglafazia.com
Ralph J. Monaco, Esq. rmonaco.c-l@snet.net
Randall L. Souza, Esq. stationfirelitigation@nixonpeabody.com
Richard W. MacAdams, Esq. rmacadams@mandwlaw.com
Robert P. Corrigan, Esq. rpcorrigan@conversent.net
Robert T. Norton, Esq. rnorton@sloanelwalsh.com
Robert I. Reardon, Esq. reardonlaw@aol.com
Robert K. Taylor, Esq. rkt@psh.com
Ronald J. Creamer, Esq. resminilaw@yahoo.com
Ronald Langlois, Esq. rlanglois@smithbrink.com
Ronald J. Resmini, Esq. resminilaw@yahoo.com
Russell Bramley, Esq. bramley@hbhlaw.net
S. Michael Levin, Esq. mlevin@wszlaw.com
Scott J. Tucker, Esq. stucker@ths-law.com
Stefanie DiMaio-Larivee, Esq. fonial@msn.com
Stephen T. Armato, Esq. stationlitigation@cetcap.com
Stephen E. Breggia, Esq. sbreggia@bbqlaw.us
Stephen P. Fogerty, Esq. fogerty@halloran-sage.com
Stephen J. MacGillivray, Esq. smacqillivray@eapdlaw.com
Stephen M. Prignano, Esq. sprignano@eapdlaw.com
Steven J. DeLuca, Esq. sdeluca@morrisonmahoney.com
Steven W. Kasten, Esq. skasten@mwe.com
Steven A. Minicucci, Esq. sminicucci@calvinolaw.com
Steven M. Richard, Esq. stationfirelitigation@nixonpeabody.com
Stewart Grossman, Esq. sgrossman@lgllp.com
Susan S. Wettle, Esq. swettle@fbtlaw.com
Suzanne O'Donoghue, Esq. sodonoghue@hcc-law.com
T. Dos Urbanski, Esq. stationlitigation@melicklaw.com

Thomas C. Angelone, Esq.	angelonelaw@aol.com
Thomas R. Bender, Esq.	stationfire@hansoncurran.com
Thomas G. Briody, Esq.	tbriodylaw@aol.com
Thomas J. Cronin, Esq.	tcronin@gunninglafazia.com
Thomas W. Lyons, Esq.	tlyons@straussfactor.com
Timothy B. Hardwicke, Esq.	timothy.hardwicke@lm.com
Timothy A. Williamson, Esq.	aminchillo@itwlaw.com
Tracy L. Poppe, Esq.	reardonlaw@aol.com
W. Thomas McGough, Jr., Esq.	tmcgough@reedsmith.com
William F. Burke, Esq.	wburke@apslaw.com
William M. Heffernan, Esq.	heffernanlaw@aol.com
William A. Filippo, Esq.	wfilippo@calvinolaw.com
William E. O'Gara, Esq.	wogara@pld-law.com

/s/ Patrick T. Jones

/s/ Peter J. Schneider

Patrick T. Jones, Esq. (#6636)

Peter J. Schneider, Esq. (#6834)

Cooley Manion Jones LLP

21 Custom House Street

Boston, MA 02110

Tel.: 617-737-3100

Fax: 617-737-3113

[email: pjones@cmjlaw.com]

[email: pschneider@cmjlaw.com]