

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 --
ESSEX INSURANCE COMPANY, UNDERWRITERS AT LLOYD'S, LONDON,
SURPLEX UNDERWRITERS INC., V.B. GIFFORD & COMPANY, INC., GRESHAM &
ASSOCIATES OF R.I., INC., GRESHAM & ASSOCIATES OF RHODE ISLAND, INC.
AND ANCHOR SOLUTIONS COMPANY, INC.

Counsel for the Gray Plaintiffs¹ and counsel for Defendants Essex Insurance Company, Underwriters at Lloyd's, London, Surplex Underwriters Inc., V.B. Gifford & Company, Inc., Gresham & Associates of R.I., Inc., Gresham & Associates of Rhode Island, Inc. and Anchor Solutions Company, Inc. wish to advise the Court that settlement in principle has been reached for the following respective considerations:

Essex Insurance Company	\$100,000
Underwriters at Lloyd's, London	\$100,000
Surplex Underwriters Inc.	\$ 35,000
V.B. Gifford & Company, Inc.	\$ 7,500
Gresham & Associates of R.I., Inc. and Gresham & Associates of Rhode Island, Inc.	\$ 10,000
Anchor Solutions Company, Inc.	\$ 10,000

¹ All Plaintiffs represented by counsel in Gray, et al. v. Derderian, et al., C.A. No. 04-312L and Napolitano, et al. v. Derderian, et al., C.A. No. 06-080L as indicated by the signatures of counsel.

These Defendants, comprising all of the solvent "insurance inspection defendants" whose Motions to Dismiss were earlier granted by this Court (and from which decision appeals are presently pending in the First Circuit Court of Appeals) have agreed to resolve all claims against them, including all issues pending on appeal, by the above payments. Plaintiffs' counsel in all pending Station Fire Cases² have agreed to this settlement which is expressly subject to: (1) approval by all Plaintiffs; (2) execution of a mutually acceptable settlement and release agreement by all Plaintiffs; (3) approval of this settlement by this Court; and (4) approval by this Court of the allocation plan being developed by the Special Master.

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: inw@wistbar.com]
[email: jpb@wistbar.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 #1 through #11, inclusive, #12b, #13a, b, and c, #14 through #16, inclusive, #80

Plaintiffs #65b, #71 through #75, inclusive, #197 through #214, inclusive, #224; #234

² 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. 06-080L; 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 and Guindon, et al. v. Derderian, et al., C.A. No. 07-366; 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.

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 #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 #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]

Defendant Essex Insurance Company,
By its Attorneys,

/s/ Mark C. Hadden
Mark C. Hadden, Esq. (#3101)
68 Kennedy Plaza, Suite 3
Providence, RI 02903
Tel.: 401-274-0909
[email: mhadden@mhaddenlaw.com]

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 #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 #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]

/s/ Eric B. Hermanson
Eric B. Hermanson, Esq. (*pro hac vice*)
Choate, Hall and Stewart
Two International Place
Boston, MA 02110
Tel.: 617-248-5000
[email: ehermanson@choate.com]

Defendant Underwriters at Lloyd's, London,
By its Attorney,

/s/ Mark P. Dolan
Mark P. Dolan, Esq. (#3280)
Rice, Dolan & Kershaw
170 Westminster Street, Suite 900
Providence, RI 02903
Tel.: 401-272-8800
Fax: 401-421-7218
[email: ricedolank@aol.com]

Defendant Surplex Underwriters, Inc.,
By its Attorney,

/s/ Thomas J. Cronin
Thomas J. Cronin, Esq. (#5302)
Nolan, Dailey, Rothemich &
Brunero, Ltd.
1070 Main Street
Coventry, RI 02816
Tel.: 401-828-5800
Fax: 401-823-3230
[email: tjc@ndgrb.com]

Defendant V.B. Gifford & Company, Inc.,
By its Attorney,

/s/ William Heffernan
William Heffernan, Esq. (#2498)
Heffernan Law Offices, PC
2145 Diamond Hill Road, Suite One
Cumberland, RI 02864
Tel.: 401-334-5600
[email: heffernanlaw@aol.com]

Defendants Gresham & Associates of
R.I., Inc. and Gresham & Associates of
Rhode Island, Inc.,
By their Attorney,

/s/ Stephen P. Fogerty
Stephen P. Fogerty, Esq. (*pro hac vice*)
Halloran & Sage LLP
315 Post Road, West
Westport, CT 06880-4739
Tel.: 203-227-2855
Fax: 203-227-6992
[email: fogerty@halloran-sage.com]

Defendant Anchor Solutions Company, Inc.,
By its Attorney,

/s/ Dennis J. Roberts, II
Dennis J. Roberts, II, Esq. (#0560)
Law Office of Dennis J. Roberts, II
49 Westminster Street, Suite 305
Providence, RI 02903
Tel.: 401-274-9600
Fax: 401-274-6500
[email: drobotts@djrlaw.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 8th of September, 2008.

Andrew A. Beerworth, Esq.	abeerworth@morrisonmahoney.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.	horqanlaw@snet.net
Daniel P. McKiernan, Esq.	danielpmckiernan@yahoo.com
David D. Langfitt, Esq.	dlangfitt@mmwr.com
David E. Maglio, Esq.	dmaglio@magliolaw.com
David T. Mitrou, Esq.	dmitrou@mccormackfirm.com
David A. Wollin, Esq.	dwoillin@apslaw.com
Deborah Solmor, Esq.	dsolmor@skadden.com
Denean M. Russo, Esq.	drusso@mwdqlaw.com
Dennis J. Roberts, II, Esq.	droberts@dirlaw.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.	jlee@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
John H. Brooke, Esq.	jbrooke@brookemawhorr.com
John A. Caletri, Esq.	jcaletri@melicklaw.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
Kate B. Harden, Esq. for J.Renn Olenn kbh@olenn-penza.com
Karen A. Alegria, Esq. karen@Briancunha.com
Karen K. Corcoran, Esq. karen@desistolaw.com
Karey P. Pond, Esq. kpond@tedfordhenry.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@bbglaw.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. mnuigent@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. mqs@gsm-law.com
Nancy W. Hamilton, Esq. nhamilton@jw.com
Nicholas B. Kosiavelon, Esq. nkosiavelon@BMCattorneys.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@gunninglafazia.com
Ralph J. Monaco, Esq. rmonaco.c-l@snet.net
Randall L. Souza, Esq. stationfirelitigation@nixonpeabody.com
Robert P. Corrigan, Esq. rpcorrigan@conversent.net
Robert T. Norton, Esq. rnorton@sloanewalsh.com
Robert I. Reardon, Esq. reardonlaw@aol.com
Robert L. Reifenberg, Esq. rreifenberg@clausen.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 Carroll, Esq.	scarroll@BMCattorneys.com
Scott J. Tucker, Esq.	stucker@ths-law.com
Stefanie DiMaio-Larivee, Esq.	fofia@msn.com
Stephen T. Armato, Esq.	stationlitigation@cetcap.com
Stephen E. Breggia, Esq.	sbreggia@bbglaw.us
Stephen P. Fogerty, Esq.	fogerty@halloran-sage.com
Stephen J. MacGillivray, Esq.	smacgillivray@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 W. Lyons, Esq.	tlyons@straussfactor.com
Timothy B. Hardwicke, Esq.	timothy.hardwicke@lm.com
Timothy R. Scannell, Esq.	tscannell@BMCattorneys.com
Timothy A. Williamson, Esq.	aminchillo@itwlaw.com
Tracy L. Poppe, Esq.	reardonlaw@aol.com
Tyler Jay Lory, Esq.	tlory@clausen.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
William P. Pistorius, Esq.	wpistorius@clausen.com

/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

(401) 831-2700

(401) 272-9752 (fax)

Email: mw@wistbar.com

Email: jpb@wistbar.com