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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
MICHAEL FEDER, on behalf of himself and all
others similarly situated, OHIO STATE FUNDS
and PUBLIC EMPLOYEES' RETIREMENT
SYSTEM OF MISSISSIPPI,

Plaintiffs,

-v-

AMERICAN INTERNATIONAL GROUP, INC.,
MAURICE GREENBERG, HOWARD SMITH
and THOMAS TIZZIO,

Defendants.

-----X
JEROME NOLL, individually and on behalf
of all others similarly situated,

Plaintiff,

-v-

AMERICAN INTERNATIONAL GROUP, INC.,
MAURICE GREENBERG, HOWARD SMITH
and THOMAS TIZZIO,

Defendants.

-----X
STEPHAN FRANK, on behalf of himself and
all others similarly situated,

Plaintiff,

-v-

AMERICAN INTERNATIONAL GROUP, INC.,
MAURICE GREENBERG, HOWARD SMITH
and THOMAS TIZZIO,

Defendants.

-----X
JOSEPH SCUILLA, individually and on behalf

No. 04 Civ. 8141 (LTS) (AJP)

No. 04 Civ. 8226 (LTS) (AJP)

No. 04 Civ. 8292 (LTS) (AJP)

of all others similarly situated,

Plaintiff,

-v-

No. 04 Civ. 8336 (LTS) (AJP)

AMERICAN INTERNATIONAL GROUP, INC.,
MAURICE GREENBERG, HOWARD SMITH,
MICHAEL CASTELLI and MARTIN SULLIVAN,

Defendants.

-----X
EUGENE OLSON,

Plaintiff,

-v-

No. 04 Civ. 8339 (LTS) (AJP)

AMERICAN INTERNATIONAL GROUP, INC.,
MAURICE GREENBERG, HOWARD SMITH
and THOMAS TIZZIO,

Defendants.

-----X
ROBERT J. CASEY, II, on behalf of himself
and all others similarly situated,

Plaintiff,

-v-

No. 04 Civ. 8366 (LTS) (AJP)

AMERICAN INTERNATIONAL GROUP, INC.,
MAURICE GREENBERG, HOWARD SMITH
and THOMAS TIZZIO,

Defendants.

-----X
LISA M. CROUCH, on behalf of herself and
all others similarly situated,

Plaintiff,

-v-

No. 04 Civ. 8579 (LTS) (AJP)

AMERICAN INTERNATIONAL GROUP, INC.,
MAURICE GREENBERG, HOWARD SMITH
and THOMAS TIZZIO,

Defendants.

-----X
MICHAEL CASSIDY, individually and on behalf
of all others similarly situated,

Plaintiff,

-v-

No. 04 Civ. 8642 (LTS) (AJP)

AMERICAN INTERNATIONAL GROUP, INC.,
MAURICE GREENBERG, HOWARD SMITH
and THOMAS TIZZIO,

Defendants.

-----X
ANNE E. FLYNN, on behalf of herself and all
others similarly situated,

Plaintiff,

-v-

No. 04 Civ. 9301 (LTS) (AJP)

AMERICAN INTERNATIONAL GROUP, INC.,
MAURICE GREENBERG, HOWARD SMITH
and THOMAS TIZZIO,

Defendants.

-----X
ROBERT D. JAFFEE IRA ROLLOVER,
ROBERT D. & PHYLLIS A. JAFFEE FAMILY
FOUNDATION and ROBERT D. JAFFE, as
Trustee of the Robert D. Jaffee Revocable Trust,

Plaintiffs,

-v-

No. 04 Civ. 9615 (LTS) (AJP)

AMERICAN INTERNATIONAL GROUP, INC.,
MAURICE GREENBERG, HOWARD SMITH
and THOMAS TIZZIO,

Defendants.

-----X

LAURA TAYLOR SWAIN, UNITED STATES DISTRICT JUDGE

ORDER CONSOLIDATING CASES

The Court is in receipt of various motions to consolidate in class actions brought against American International Group, Inc. (“AIG”), and others, all of which involve common questions of law and fact. There has been no opposition to the applications for consolidation from any party to the actions brought pursuant to the securities laws.

Consolidation

Pursuant to Rule 42 of the Federal Rules of Civil Procedure, the Court may consolidate “actions involving a common question of law or fact.” Fed. R. Civ. P. 42(a). The Court is granted broad discretion in its determination of whether consolidation is appropriate. Johnson v. Celotex Corp., 899 F.2d 1281, 1284-85 (2d Cir. 1990).

The Court finds that all of the above-captioned actions present common factual and legal issues, involve overlapping defendants and will involve similar subject matter and similar issues related to class certification. Accordingly, the Court finds that the actions should be consolidated, in the interests of judicial economy. Therefore, it is hereby ORDERED as follows:

A. CONSOLIDATION

1. The above-captioned actions are consolidated for all purposes pursuant to Federal Rule of Civil Procedure 42(a). The consolidated cases do not include Amidei v. American International Group, Inc., et al., 04 Civ. 9387, or any other action brought pursuant to ERISA. The consolidated securities cases shall be referred to collectively as In re American International

Group, Inc. Securities Litigation, Master File No. 04 Civ. 8141 (LTS)(AJP).

2. No action taken hereunder shall have the effect of making any person, firm or corporation a party to any action in which the person or entity has not been named, served, or added as such in accordance with the Federal Rules of Civil Procedure.

B. MASTER DOCKET AND SEPARATE ACTION DOCKETS

1. A Master Docket is hereby established for the consolidated proceedings in the actions consolidated herein and any other actions subsequently consolidated with them either for all purposes or for pretrial purposes (the "Consolidated Actions"). Entries in said Master Docket shall be applicable to the Consolidated Actions, and entries shall be made therein in accordance with the regular procedures of the Clerk of this Court, except as modified by this Order.

2. (a) When a pleading is filed and the caption, pursuant to this Order, shows that it is applicable to "All Actions," the parties shall electronically or manually file such pleading pursuant to this Court's Guidelines and Amended Instructions for Electronic Case Filing.

(b) When a pleading is electronically filed and the caption, pursuant to this Order, shows that it is applicable to "All Actions," the parties shall electronically file such pleading in the Master File only. Docket entries shall not be made to each separate action.

(c) When a pleading is manually filed and the caption, pursuant to this Order, shows that it is applicable to "All Actions," the parties shall submit to this Court the original

pleading for the Master File. No copies shall be submitted for each separate action.

Upon receiving the original pleading, the Clerk shall docket the pleading to the Master File only. Docket entries shall not be made to each separate action.

C. MASTER FILE AND SEPARATE ACTION FILES

1. A Master File is hereby established for the consolidated proceedings in the Consolidated Actions. The Master File shall be Civil Action No. 04 Civ. 8141 (LTS)(AJP). The original of this Order shall be docketed by the Clerk of Court in the Master File herein established.
2. The Clerk shall maintain a separate file for each of the Consolidated Actions, and filings shall be made therein in accordance with the regular procedures of the Clerk of this Court except as modified by Section B of this Order. The Clerk shall docket a copy of this Order in each such separate file. Once the Clerk has docketed this Order, counsel of record in each of the Consolidated Actions will receive a Notice of Electronic Filing.

D. NEWLY FILED OR TRANSFERRED ACTIONS

1. When a class action that relates to the same subject matter as the Consolidated Actions is hereafter filed in or transferred to this Court and assigned to the undersigned, it shall be consolidated with these actions in the same manner as the cases identified in Section A above (provided that any case transferred to this Court solely for pretrial proceedings shall be consolidated only to that extent absent further order of this Court), except as provided below, and the Clerk of Court shall:
 - (a) Docket a copy of this Order in the file for newly filed or transferred actions.

(b) Make an appropriate entry in the Master Docket.

2. The Court requests the assistance of counsel in calling to the attention of the Clerk the filing or transfer of any case which might properly be consolidated with these actions.

E. APPLICATION OF THIS ORDER TO SUBSEQUENT CASES

1. This Order shall apply to each class action assigned to the undersigned alleging claims similar to those set forth in these actions, whether brought on behalf of holders of AIG stocks, bonds, or any other securities, so long as AIG is named as a defendant in the action. This Order shall apply to each such case which is subsequently filed in or transferred to this Court and which is assigned to the undersigned, unless a party objecting to the consolidation of that case or to any other provision of this Order serves an application for relief from this Order or from any of its provisions within ten (10) days after the date on which the Clerk notifies counsel for that party of this Order. The provisions of this Order shall apply to such action pending the Court's ruling on the application.

2. Unless a plaintiff in a subsequently filed or transferred case is permitted by the Court to use a separate complaint, defendants shall not be required to answer, plead or otherwise move with respect to that complaint in any such case. If a plaintiff in any such case is permitted to use a separate complaint, each defendant shall have thirty days from the date the Court grants such permission within which to answer, plead or otherwise move with respect to any such complaint.

F. CAPTIONS

1. Every pleading filed in the Consolidated Action, and in any separate action included therein,

2. (a) When a paper is electronically filed and the caption shows that it is applicable to “All Actions,” the parties shall electronically file such paper in the Master File only. No docket entries shall be made to each separate action.

(b) When a paper is manually filed and the caption shows that it is applicable to “All Actions,” the parties shall submit to this Court the original paper for the Master File. Copies shall not be submitted for each separate action. Upon receiving the original paper, the Clerk shall docket the paper to the Master File only. Docket entries shall not be made to each separate action.

3. (a) When a paper is filed and the caption shows that it is applicable to fewer than “All Actions,” the parties shall electronically or manually file such paper pursuant to this Court’s Guidelines and Amended Instructions for Electronic Case Filing.

(b) When a paper is electronically filed and the caption shows that it is applicable to fewer than “All Actions,” the parties shall electronically file such paper in the Master File and electronically file such paper to each separate action to which it applies.

(c) When a paper is manually filed and the caption shows that it is applicable to fewer than “All Actions,” the parties shall submit to this Court the original paper for the Master File and copies of such paper for each separate action to which it applies. Upon receiving the papers, the Clerk shall docket the original paper to the Master File and docket copies of such paper to each separate action to which it applies.

H. SCHEDULE

1. The Ohio Public Employees Retirement System, the State Teachers Retirement System of Ohio, and the Ohio Police and Fire Pension Fund, the Lead Plaintiff, shall file and serve a Consolidated Amended Complaint for the Consolidated Actions and any actions subsequently consolidated with them, within sixty (60) days of the date of this Order.
2. Pending filing and service of the Consolidated Amended Complaint, defendants shall have no obligation to move, answer, or otherwise respond to any of the complaints in the actions consolidated herein or any actions subsequently consolidated with them.
3. Defendants shall answer or otherwise respond to the Consolidated Amended Complaint within of sixty (60) days after service thereof.
4. If Defendants move to dismiss the Consolidated Amended Complaint, opposition papers shall be served and filed within forty-five (45) days after the filing and service of such motion, and any reply papers shall be served and filed within thirty (30) days after the filing and service of plaintiffs' opposition papers.
5. A pre-trial conference in the above-captioned matter and oral argument on any pending

motions shall be held on August 25, 2005 at 2:30 p.m.

6. Further proceedings in these consolidated actions will be conducted in compliance with the provisions of the Preliminary Pre-Trial order issued in the lead case, dated November 4, 2004, and in accordance with applicable orders, federal and local court procedural rules and Individual Practices Rules of the undersigned, including Rule 2.B. thereof.

SO ORDERED.

Dated: New York, New York
February 7, 2005



LAURA TAYLOR SWAIN
United States District Judge