

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WILLIAM P. ISHAM, Individually and on Behalf of All Others Similarly Situated,)	No. 1:08-cv-11449-NMG
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
PERINI CORP., et al.,)	<u>Hearing Requested</u>
)	
Defendants.)	
)	
<hr/> MARION ROLLMAN, Individually and on Behalf of All Others Similarly Situated,)	No. 1:08-cv-11556-NMG
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
PERINI CORPORATION, et al.,)	
)	
Defendants.)	
)	
<hr/>)	

THE PENSION FUND GROUP'S MOTION FOR CONSOLIDATION OF RELATED
ACTIONS, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF SELECTION OF
LEAD AND LIAISON COUNSEL

Proposed lead plaintiffs, Iron Workers District Council, Southern Ohio & Vicinity Pension Trust and Operating Engineers Construction Industry and Miscellaneous Pension Fund (collectively, the "Pension Fund Group"), hereby move this Court for an Order (attached hereto as Exhibit A): (1) consolidating the related securities class actions pursuant to Federal Rule of Civil Procedure 42(a); (2) appointing the Pension Fund Group as Lead Plaintiff in the above-captioned actions; (3) approving its selection of Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel and Shapiro Haber & Urmy LLP to serve as Liaison Counsel; and (4) granting such other and further relief as the Court may deem just and proper. In support of this motion, the Pension Fund Group submits herewith a Memorandum of Law and the Declaration of Adam M. Stewart.¹

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(D), plaintiff respectfully submits that it believes oral argument may assist the court and wishes to be heard on this matter.

¹ Pursuant to the Private Securities Litigation Reform Act of 1995, a motion for appointment as lead plaintiff may be made by any class member who wishes to seek appointment as lead plaintiff, whether or not they have previously filed a complaint in this action, no later than 60 days following the publication of the first notice advising investors of the pendency of this action. 15 U.S.C. §§78u-4(a)(3)(A) and (B). While all potential parties to the action should be aware of this filing deadline, counsel for the Pension Fund Group will not be able to determine who else may move for appointment as lead plaintiff until such motions are filed. Accordingly, counsel for the Pension Fund Group requests leave from the meet and confer requirement of Local Rule 7.1(A)(2) with respect to the filing of this Motion.

DATED: October 20, 2008

SHAPIRO HABER & URMY LLP

/s/ Adam M. Stewart

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[Proposed] Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I 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 October 20, 2008.

/s/ Adam M. Stewart

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ORDER GRANTING THE PENSION FUND GROUP'S MOTION FOR CONSOLIDATION
OF RELATED ACTIONS, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF
SELECTION OF LEAD AND LIAISON COUNSEL

Having considered the Pension Fund Group's Motion for Consolidation of Related Actions, Appointment as Lead Plaintiff and Approval of Selection of Lead and Liaison Counsel, and the accompanying Memorandum of Law and Declaration of Adam M. Stewart in support thereof, and good cause appearing therefor:

1. The Pension Fund Group is hereby appointed Lead Plaintiff for the putative class pursuant to the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995; and

2. The Court approves the Pension Fund Group's selection of Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel and Shapiro Haber & Urmy LLP, LLC to serve as Liaison Counsel.

IT IS SO ORDERED.

DATED: _____, 2008

THE HONORABLE NATHANIEL M. GORTON
UNITED STATES DISTRICT JUDGE

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/s/ Adam M. Stewart

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