

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

NING YU, On Behalf of Himself and All Others Similarly Situated,)	
)	
)	C.A. No. 1:08-cv-11108-JLT
Plaintiff,)	
)	
vs.)	
)	
STATE STREET CORPORATION, et al.,)	<u>Hearing Requested</u>
)	
Defendants.)	
)	
<hr/>)	
PHYLLIS CRAIN, Individually and On Behalf of All Others Similarly Situated,)	
)	
Plaintiff,)	
)	
vs.)	C.A. No. 1:08-cv-11261-JLT
)	
STATE STREET CORPORATION, et al.,)	
)	
Defendants.)	
)	
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**MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND
APPROVAL OF SELECTION OF LEAD AND LIAISON COUNSEL**

Class member Anatoly Alexander, by his counsel, hereby moves this Court for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing Anatoly Alexander as Lead Plaintiff; (iii) approving Anatoly Alexander’s selection of the law firms of Coughlin Stoia Geller Rudman & Robbins LLP and Dyer & Berens LLP to serve as Lead Counsel and the law firm of Shapiro Haber & Urmy LLP to serve as Liaison Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Anatoly Alexander submits herewith a Memorandum of Law and Declaration of Thomas G. Shapiro.

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.

DATED: September 2, 2008

Respectfully submitted,

/s/ Thomas G. Shapiro

Thomas G. Shapiro (BBO#454680)
Adam M. Stewart (BBO#661090)
Shapiro Haber & Urmy LLP
53 State Street
Boston, MA 02109
Telephone: (617) 439-3939
Facsimile: (617) 439-0134
tshapiro@shulaw.com
astewart@shulaw.com

[Proposed] Liaison Counsel

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SAMUEL H. RUDMAN
DAVID A. ROSENFELD
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)
srudman@csgrr.com
drosefeld@csgrr.com

DYER & BERENS LLP
ROBERT J. DYER III
JEFFREY A. BERENS
682 Grant Street
Denver, CO 80203
Telephone: 303/861-1764
303/395-0393 (fax)
bob@dyerberens.com
jeff@dyerberens.com

[Proposed] Co-Lead Counsel for Plaintiffs

HOLZER HOLZER & FISTEL, LLC
COREY D. HOLZER
MICHAEL I. FISTEL, JR.
1117 Perimeter Center West, Suite E-107
Atlanta, GA 30338
Telephone: 770/392-0090
770/392-0029 (fax)
cholzer@holzerlaw.com
mfistel@holzerlaw.com

Additional 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 September 2, 2008.

/s/ Thomas G. Shapiro
Thomas G. Shapiro

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)	
Defendants.)	
)	

**[PROPOSED] ORDER CONSOLIDATING THE ACTIONS, APPOINTING LEAD
PLAINTIFF AND APPROVING SELECTION OF LEAD AND LIAISON COUNSEL**

Having considered the Motion of Anatoly Alexander for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Lead and Liaison Counsel and the Memorandum of Law and Declaration of Thomas G. Shapiro, in support thereof, and good cause appearing therefore:

1. The Actions are hereby consolidated;
2. Anatoly Alexander is hereby appointed Lead Plaintiff for the Class pursuant to Section 27 of the Securities Act of 1933; and
3. The law firms of Coughlin Stoia Geller Rudman & Robbins LLP and Dyer & Berens LLP are hereby appointed Lead Counsel and the law firm of Shapiro Haber & Urmey LLP is hereby appointed Liaison Counsel.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE JOSEPH L. TAURO
UNITED STATES DISTRICT JUDGE