UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

KIRK DAHL, et al., Individually and on Behalf of All Others Similarly Situated, Plaintiffs, vs. BAIN CAPITAL PARTNERS, LLC, et al., Defendants.	Lead Case No. 1:07-cv-12388-WGY CLASS ACTION NAMED PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENTS WITH DEFENDANTS BAIN CAPITAL PARTNERS, LLC, AND THE GOLDMAN SACHS GROUP, INC.

Named Plaintiffs Kirk Dahl, Police and Fire Retirement System of the City of Detroit, City of Omaha Police and Fire Retirement System, and Michael Wojno, as executor for the estate of Robert Zimmerman ("Named Plaintiffs") hereby move the Court pursuant to Rule 23(e) of the Federal Rules of Civil Procedure for an order: (1) granting preliminary approval of the proposed Settlements; (2) certifying a Settlement Class pursuant to Rule 23(b)(3) of the Federal Rules of Civil Procedure for purposes of effectuating the proposed Settlements; (3) directing that Settlement Class Members be given notice of the pendency of this Action and the proposed Settlements in substantially the same form and manner set forth in the Settlement Agreements and the exhibits submitted in connection with this motion in the Appendix; (4) setting a hearing date for the Court to consider final approval of the proposed Settlements and related matters; and (5) setting a schedule of events to govern the remaining procedural aspects of the proposed Settlements.

In support of their motion, Named Plaintiffs rely on the Settlement Agreements, the exhibits submitted in connection with this motion in the Appendix, and the Memorandum of Law in Support of Named Plaintiffs' Unopposed Motion for Preliminary Approval of Settlements with Defendants Bain Capital Partners, LLC, and The Goldman Sachs Group, Inc., submitted herewith, which are incorporated herein in their entirety.

DATED: June 11, 2014

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LOCAL RULE 7.1(a)(2) CERTIFICATION

I hereby certify that Co-Lead Counsel conferred in good faith with counsel for Settling Defendants, and Settling Defendants do not oppose the relief requested herein.

s/ DAVID W. MITCHELL
DAVID W. MITCHELL

CERTIFICATE OF SERVICE

I hereby certify that this document 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 June 11, 2014.

s/ DAVID W. MITCHELL
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