

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

JOSEPH CACCIAPALLE, et al.,)	
)	
Plaintiffs,)	No. 13-466C
)	(Judge Sweeney)
v.)	
)	
THE UNITED STATES,)	
)	
Defendant.)	

PLAINTIFFS’ MOTION FOR CLASS CERTIFICATION

Plaintiffs Joseph Cacciapalle and American European Insurance Company (collectively, “Plaintiffs”), hereby move for entry of an Order, in the form attached hereto, certifying this action as a class action pursuant to Rules 23(a) and 23(b) of the Rules of the Court of Federal Claims on behalf of two Classes consisting of:

- (1) All persons and entities who held shares of Fannie Mae Preferred Stock on August 17, 2012 and who were damaged thereby, and their successors in interest (meaning current shareholders) (the “Fannie Preferred Class”);
- (2) All persons and entities who held shares of Freddie Mac Preferred Stock on August 17, 2012 and who were damaged thereby, and their successors in interest (meaning current shareholders) (the “Freddie Preferred Class”).

Excluded from both Classes are the Defendants.

Plaintiffs also move for an Order designating Joseph Cacciapalle and American European Insurance Company as class representatives. Plaintiffs also move for an Order designating the law firms of Boies Schiller Flexner LLP and Kessler Topaz Meltzer & Check LLP as Co-Lead Class Counsel.

The reasons for this motion are fully set forth in the Memorandum of Law filed simultaneously herewith.

Dated: August 16, 2018

Respectfully Submitted,

/s/ Hamish P.M. Hume

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