

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE ALLSTATE INSURANCE COMPANY)	MDL Docket No. 3:02-md-1457
UNDERWRITING AND RATING)	All Cases
PRACTICES LITIGATION)	Judge Trauger

**PLAINTIFFS' MOTION FOR FINAL APPROVAL
OF THE SETTLEMENT AND ENTRY OF FINAL JUDGMENT**

Plaintiffs Woodrow Shelton Jr., Larry Daniels, Sr., Sandra Daniels, Cynthia Silhol, Marsha D. Myers, Ronald Kevin Myers, and Michael Sanchez ("Plaintiffs") move this Honorable Court for an order of final approval of the settlement and class certification, preliminarily approved on September 21, 2004, and on December 22, 2004 and for entry of final judgment herein on all consolidated cases.

In support thereof, a separate memorandum of law is submitted.

Respectfully submitted,

JAMES, HOYER, NEWCOMER &
SMILJANICH, P.A.

s/Terry A. Smiljanich

Terry A. Smiljanich
Florida Bar No. 145359
Kathleen Clark Knight
Florida Bar No. 0047120
4830 W. Kennedy Blvd., Suite 550
Tampa, FL 33609
Telephone: (813) 286-4100
Facsimile: (813) 286-4174

DOFFERMYRE SHIELDS CANFIELD
KNOWLES & DEVINE
Kenneth S. Canfield
1355 Peachtree Street, N.E.
The Peachtree, Suite 1600
Atlanta, GA 30309
Telephone: (404) 881-8900

McCALLUM LAW FIRM, LLC
Charles A. McCallum, III
2062 Columbiana Road
Vestavia Hills, AL 35216
Telephone: (205) 824-7767

Co-Lead Plaintiffs' Counsel

DOUGLAS BOWDOIN, PA
Douglas Bowdoin
Suite 800, Citrus Center
255 S. Orange Avenue
Orlando, FL 32801

DARBY, PEELE, BOWDOIN PAYNE
& KENNON
Rod Bowdoin
P.O. Drawer 1707
Lake City, FL 32056

PARRY DEERING FUTSCHER & SPARKS
Ronald R. Parry
411 Garrard Street
Covington, KY 41011

FINKELSTEIN & KRINSK
Howard Finkelstein
501 W. Broadway, Suite 1250
San Diego, CA 92101

HOWELL & JACKSON, PLLC
R. Scott Jackson, Jr. #13839
144 Second Avenue, North - Suite 450
Nashville, TN 37201
Telephone: (615) 313-8188

LAW OFFICE OF A. THOMAS STUBBS
A. Thomas Stubbs
Suite 720 Commerce Plaza
755 Commerce Drive
Decatur, GA 30030
Telephone: (404) 378-3633

LAW OFFICES OF SUZANNE SCHWARZ, PC
Suzanne M. Schwarz
PO Box 532044
Harlingen, TX 78553

SHEPHERD, FINKELMAN, MILLER & SHAH
Natalie Finkelman Bennett
35 E. State Street
Media, PA 19063

ROERIG, OLIVEIRA & FISHER, LLP
Rene Oliveira
855 West Price Road, Suite 9
Brownsville, TX 78520

MARTINEZ, BARRERA & MARTINEZ, LLP
Benigno “Trey” Martinez
1201 East Van Buren
Brownsville, TX 78520

Earl P. Underwood Jr.
21 South Section Street
PO Box 969
Fairhope, AL 36533

BODENHEIMER, JONES, SZWAK &
WINCHELL, LLP
David A. Szwak
401 Market Street, Suite 240
Shreveport, LA 71101

BALL & SCOTT
Gordon Ball
Bank of America, Suite 750
550 Main Avenue
Knoxville, TN 37902

COHEN, MILSTEIN, HAUSFELD &
TOLL, PLLC
Lisa M. Mezzetti
Suite 500 West Tower
1100 New York Avenue, N.W.
Washington, DC 20005

Plaintiffs’ Liaison Counsel

CERTIFICATE OF SERVICE

I hereby certify that true and correct electronic copies of the foregoing are being served via Federal Express Overnight Delivery, on this 7th day of JULY, 2005, to the following counsel:

Andrew B. Campbell
Wyatt Tarrant & Combs
2525 West End Avenue, Suite 1500
Nashville, TN 37203-1423

Jeffrey Lennard
Sonnenschein, Nath & Rosenthal
Sears Tower, Suite 8000
233 S. Wacker Drive
Chicago, IL 60606

and also:

Mitchell A. Toups
Weller, Green, Toups & Terrell, LLP
2615 Calder Street, Suite 400
Beaumont, TX 77704
Counsel for Objector Loren Cook

Thomas E. Cooper
215 N. Mulberry Street
Elizabethtown, KY 42701-1473
Objector: Thomas E. Cooper

Robert W. Bishop
Bishop & Associates, PSC
6520 Glenridge Park, Suite 6
Louisville, KY 40222
Counsel for Objectors: William & Rebecca Yoes, et al.

William Kenneth C. Dippel
Dippel & Davis
12201 Merit Drive, Suite 230
Dallas, TX 75251
Counsel for Objector Nathan Dunning

Douglas A. Cole
Stern & Cole
571 Milford-Warren Glen Road
Milford, NJ 08848
Counsel for Objector Maria Isabella

Timothy E. Eble
PO Box 2313
Mount Pleasant, SC 29465
Objector: Timothy Eble
[Service by Express U.S. Mail]

Nicholas M. Fausto
Law Offices of Nicholas M. Fausto
617 Stokes Road, Suite 4-150
Medford, NJ 08055
Counsel for Objector Russell Kious

Michael T. George
The Law Firm of Michael T. George, P.C.
2525 S. Brentwood Blvd., Suite 102
St. Louis, MO 63144
**Counsel for Objectors Ruth & Robert
Binford, et al.**

Dennis D. Gibson
James M. McCoy
Gibson, McClure, Wallace & Daniels, L.L.P.
8080 N. Central Expressway
Suite 1300, L.B. 50
Dallas, TX 75206-1808
Counsel for Objector Paige McCoy

Joanne Jannick
Post Office Box 20086
Tuscaloosa, AL 35402
**Objectors: Calvin Pruitt, Frank Gourdouze
& Shirley Blanton**
[Service by Express U.S. Mail]

J. Scott Kessinger
7304 Michigan Avenue
St. Louis, MO 63111
**Counsel for Objectors William Zorn & Jesus
Itarte**

Michael R. Lunsford
Porterfield, Harper, Mills & Motlow, P.A.
22 Inverness Center Parkway, Suite 600
Birmingham, AL 35242
**Counsel for Objectors Todd Miranda &
Kelly Miranda**

Lance Mayes
305 Rivergate Park Office Bldg.
1994 Gallatin Road, North
Madison, TN 37115
**Counsel for Objectors Linda & Ronald
Cazier**

Lance Mayes
305 Rivergate Park Office Bldg.
1994 Gallatin Road, North
Madison, TN 37115
**Counsel for Objectors Marlana Geha &
Andrea Yatooma**

Jennifer Nakata
530 Long Beach Lane
Pasadena, CA 91103

John J. Pentz
Class Action Fairness Group
2 Clock Tower Place, Suite 260G
Maynard, MA 01754
**Counsel for Objectors Joseph & Renee
Fraum; Alan Shapiro**

Charles M. Thompson
Charles M. Thompson, P.C.
5130 Cyrus Circle
Birmingham, AL 35242
**Counsel for Objectors Leroy & Clara
Sanders, Beverly Perkins, Stephen & Linda
Preston; Tyrae Shorter**

Jasen J. Thompson
Thompson & Thompson, P.C.
3510 N. St. Marys, Suite 100
San Antonio, TX 78212
**Counsel for Objectors Robert & Kelly
Thompson**

Chris M. Trepagnier
The Trepagnier Law Firm
209 Highway 22 West, Suite G
Madisonville, LA 70447
Objector: Shanda Trepagnier

Dawn Adams Wheelahan
650 Poydras Street, Suite 1550
New Orleans, LA 70130
**Counsel for Objectors Dawn Grenn &
Adela Guerra**

John P. Willis, IV
John P. Willis, IV, P.C.
311 Magnolia Avenue
Fairhope, AL 36532
Counsel for Objector Paul Townes

s/Terry A. Smiljanich
TERRY A. SMILJANICH