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BY HAND DELIVERY

Tracy A. Uhrin, Clerk
Merrimack Superior Court
P.O. Box 2880
163 North Main Street
Concord, NH 03302-2880

RE: Docket No. 217-2010-CV-00414, *Georgia Tuttle, M.D., Derry Medical Center and LRGHealthcare, On Behalf of Themselves and Those Similarly Situated v. New Hampshire Medical Malpractice Joint Underwriting Association*

Dear Clerk Uhrin:

Enclosed for filing with the Court in the matter referenced above, please find the following filings, submitted in three separately bound volumes, together with two courtesy sets:

- I. Notice to the Preliminary Certified Class, approved by Court Order dated June 5, 2018.
- II. Motion to Approve the Plan of Allocation, Case Contribution Awards for Certain Class Members, and Class Counsel's Fees and Costs.
- III. Memorandum of Law in Support of Motion to Approve the Plan of Allocation, Case Contribution Awards for Certain Class Members, and Class Counsel's Fees and Costs.

(Documents I through III are bound in the first of three separate volumes.)

- IV. Appendix of Exhibits to the Memorandum of Law:
 1. Affidavit of W. Scott O'Connell in Support of the Plan of Allocation, Case Contribution Awards, and Class Counsel's Fees and Costs, with the following Exhibits:

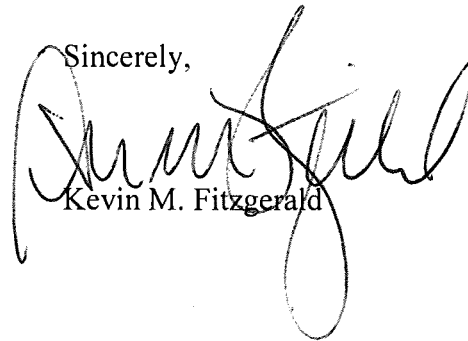
- A. List of Nixon Peabody LLP's NHMMJUA Policyholder Clients;
 - B. Policyholder Retention and Contingent Fee Agreement;
 - C. New Hampshire Department of Insurance Market Conduct Examination Report dated October 24, 2013;
 - D. New Hampshire Department of Insurance Report on Availability of Medical Malpractice Insurance dated February 19, 2015;
 - E. Letter to Senator Sharon Carson dated April 30, 2015;
 - F. Table of Costs Incurred as of July 11, 2018;
 - G. Timekeeper Hours for Initial Distribution Actions (previously attached as Exhibit L to O'Connell Affidavit dated September 5, 2012); and
 - H. Nixon Peabody LLP Timekeeper Hours for Post Distribution Actions.
2. Affidavit of Mitchell B. Jean, Esq. in Support of the Plan of Allocation, Case Contribution Awards, and Class Counsel's Fees and Costs, with Exhibit:
 - A. LRGHealthcare Retention and Contingent Fee Agreement.
 3. Affidavit of Thomas Buchanan in Support of the Plan of Allocation, Case Contribution Awards, and Class Counsel's Fees and Costs, with Exhibit:
 - A. Derry Medical Center Retention and Contingent Fee Agreement.
 4. Affidavit of Georgia A. Tuttle, M.D. in Support of the Plan of Allocation, Case Contribution Awards, and Class Counsel's Fees and Costs, with Exhibit:
 - A. Tuttle Retention and Contingent Fee Agreement.
 5. Affidavit of David E. Strang, M.D. in Support of the Plan of Allocation, Case Contribution Awards, and Class Counsel's Fees and Costs, with Exhibit:
 - A. Central NH ER Associates, P.A. Retention and Contingent Fee Agreement.
 6. Class Representatives' Proposed Plan of Allocation and Distribution of the Excess Surplus Funds Remaining after the Liquidation of NHMMJUA.

(Documents IV(1) – (6) are bound in the second of three separate volumes.)

We are filing, **as the third of three separately bound volumes**, and concurrently with this filing, the Affidavit of Professor William B. Rubenstein in Support of Class Counsel's Fee Request, with Exhibits:

- A. Affidavit of Professor William B. Rubenstein in support of Class Counsel's Fee Request, *Tuttle v. New Hampshire Med. Malpractice Joint Underwriting Ass'n*, No. 217-2010-CV-414 (N.H. Super. Ct. July 11, 2012); and
- B. List of 24 Cases with Multipliers of 6 or Greater.

Sincerely,



Kevin M. Fitzgerald

Enclosures

cc: J. David Leslie, Esq.
Eric A. Smith, Esq.
J. Christopher Marshall, Esq.
Daniel J. Mullen, Esq.
W. Scott O'Connell, Esq.