

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI**

CARPENTERS PENSION FUND OF  
ILLINOIS, IRON WORKERS LOCAL 11  
PENSION FUND, HARKISHAN PAREKH,  
LAURA WOOD, and PEORIA POLICE  
PENSION FUND, derivatively, on behalf of  
Centene Corporation,

Plaintiffs,

v.

MICHAEL F. NEIDORFF, ROBERT K.  
DITMORE, DAVID L. STEWARD, JOHN  
R. ROBERTS, TOMMY G. THOMPSON,  
FREDERICK H. EPPINGER, RICHARD A.  
GEPHARDT, ORLANDO AYALA, VICKI  
B. ESCARRA, JEFFREY A. SCHWANEKE,  
PAMELA A. JOSEPH, K. RONE  
BALDWIN, and CAROL E. GOLDMAN,

Defendants,

and

CENTENE CORPORATION,  
Nominal Defendant.

Civ. Action No.: 4:18-cv-113-CDP

**PROPOSED ORDER**

The Court having reviewed Plaintiffs Carpenters Pension Fund of Illinois (“Carpenters”), Iron Workers Local 11 Pension Fund (“Iron Workers”), Harkishan Parekh (“Parekh”), Laura Wood (“Wood”), and Peoria Police Pension Fund’s (“Peoria”) (collectively, “Plaintiffs”) Joint Motion to Appoint Lead Plaintiffs and Lead Counsel, and for good cause shown,

**IT IS HEREBY ORDERED** that:

1. Plaintiffs Carpenters, Iron Workers, and Peoria are hereby designated Lead Plaintiffs in the above-captioned consolidated derivative action (the “Action”).
2. The law firms of Cohen Milstein Sellers & Toll PLLC (“Cohen Milstein”) and

Scott+Scott, Attorneys at Law, LLP (“Scott+Scott”) are hereby designated Co-Lead Counsel, with Robbins Arroyo LLP (“Robbins Arroyo”) designated as a member of an Executive Committee, and the firm of Hartnett Gladney Hetterman, L.L.C. designated as local counsel, in the Action.

3. Co-Lead Counsel shall set strategy for the prosecution of this litigation, delegate and monitor the work performed by Plaintiffs’ attorneys to ensure that there is no duplication of effort or unnecessary expense, coordinate on behalf of Plaintiffs the initiation and conduct of discovery proceedings, and provide supervision and coordination of the activities of Plaintiffs’ counsel.

4. Co-Lead Counsel shall assume the following powers and responsibilities on behalf of all plaintiffs:

- a. Coordinate and direct the preparation of pleadings;
- b. Coordinate and direct the briefing and argument of motions;
- c. Coordinate and direct the conduct of discovery and other pretrial proceedings;
- d. Coordinate and direct the examination of witnesses in depositions;
- e. Coordinate the selection of counsel to act as Plaintiffs’ spokesperson at pretrial conferences;
- f. Call meetings of Plaintiffs’ counsel as they deem necessary and appropriate from time to time;
- g. Conduct any and all settlement negotiations with counsel for defendants;
- h. Coordinate and direct the preparation for trial and trial of this matter and to delegate work responsibilities to selected counsel as may be required; and
- i. Coordinate and direct any other matters concerning the prosecution or resolution of the Action.

5. ~~This Order shall apply to this Action and any future filed or subsequently transferred actions relating to the subject matter of this case. When a case that properly belongs as part of the Action is hereafter filed in the Court or transferred here from another court,~~ <sup>CDP</sup> this Court requests the assistance of counsel in calling to the attention of the Court the filing or transfer of any case which might properly be consolidated as part of the Action, and counsel are to assist in assuring that counsel in subsequent actions receive notice of this Order.

DATED this 7th Day of February, 2019



District Court Judge