

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

MARY ANN SIVOLELLA, et al.

Plaintiffs,

vs

AXA EQUITABLE FUNDS  
MANAGEMENT GROUP, LLC,  
et al.,

Defendants.

Civ. A. No. 3:11-cv-04194-PGS-DEA

GLENN D. SANFORD, et al.

Plaintiffs,

vs.

AXA EQUITABLE FUNDS  
MANAGEMENT GROUP, LLC,  
et al.,

Defendants.

Civ. A. No. 3:13-cv-00312-PGS-DEA

**PLAINTIFFS' MOTION IN LIMINE TO  
BAR ADMISSION OF DEFENDANTS'  
CLAIMED COSTS RELATING TO (1)  
FEES PAID TO SUB-ADVISERS AND  
SUB-ADMINISTRATOR AND (2) AXA  
EQUITABLE ALLOCATED EXPENSES**

**PLEASE TAKE NOTICE** that at a time and date to be scheduled by the Court, the undersigned attorneys for Plaintiffs Mary Ann Sivolella, et al. and Glenn D. Sanford, et al., shall move before the United States District Court for the District of New Jersey, Clarkson S. Fisher Building and U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, for an Order barring admission of defendants' claimed costs relating to (1) fees paid to the sub-advisers and sub-administrator and (2) AXA Equitable Allocated Expenses.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, Plaintiffs shall rely upon the accompanying Memorandum of Law and Declaration of Daniel S. Sweetser, Esq. A proposed form of Order is also enclosed; and

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested in the event the motion is opposed.

SZAFERMAN, LAKIND, BLUMSTEIN  
& BLADER, P.C.

By: 

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Dated: January 23, 2015