## UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF LOUISIANA

TROY LILLIE, ET AL.	*	CIVIL ACTION
	*	
VERSUS	*	DOCKET NO. 3:13CV150 c/w 19CV138
	*	
	*	JUDGE BRIAN A. JACKSON
STANFORD TRUST COMPANY,	*	
ET AL.	*	MAGISTRATE ERIN WILDER-DOOMES
****	******	*****

## MOTION FOR RECONSIDERATION

Plaintiffs, **TROY LILLIE**, *ET AL*. ("Plaintiffs" or "Retirees"), hereby move this Honorable Court for a Motion for Reconsideration and/or New Trial as to the July 9, 2019 Ruling and Order (ECF 146) by the Honorable Brian A. Jackson denying a continuance of SEI's Motion for Summary Judgment pursuant to Rule 56(d), as well as the Court's determination that no questions of fact exist regarding whether each of SEI Investments Co. and SEI Private Trust Co. (collectively "SEI") was a control person, which hinges on the Court's improper application of the legal standard for determination of a control person. (ECF 146).

As fully set forth in the accompanying memorandum, SEI stonewalled the Retirees' repeated attempts at discovery prior to the filing of its Motion for Summary Judgment. Additionally, prior to the filing of its summary judgment, SEI failed to disclose to the Court (and to Retirees) the existence and significance of its Business Services Provider ("BSP") relationship between Stanford Trust and SEI in documents that were produced after the filing of its Motion for Summary Judgment. Further, the district court's ruling was made upon factual errors as detailed in the accompanying memorandum. As such, the Retirees respectfully request a hearing before the Court and that a rehearing be granted on the Ruling (ECF 146) denying Plaintiffs' Motion for Dismissal of Summary Judgment or for a Continuance under Rule 56(d) and granting the Motion for Summary Judgment filed by SEI, which dismissed the Plaintiffs' claims against SEI with prejudice.

**WHEREFORE**, for the reasons herein, as well as those set forth more in the accompanying Memorandum in Support, Plaintiffs, **TROY LILLIE**, *ET AL*., pray their a Motion for Reconsideration and/or New Trial relating to the July 9, 2019 Ruling and Order (ECF 146) by the Honorable Brian A. Jackson be granted, and for all other general and equitable relief.

Respectfully submitted by:

## PREIS GORDON, APLC

s/Phillip W. Preis Phillip W. Preis, La. Bar Roll No. 10706 Charles M. Gordon, Jr., La. Bar Roll No. 23758 Crystal D. Burkhalter, La. Bar Roll No. 27396 Caroline P. Graham, La. Bar Roll No. 31295 Post Office Box 2786 (70821-2786) 450 Laurel Street, Suite 2050 (70801-1817) Baton Rouge, Louisiana Phone: (225) 387-0707 Fax: (225) 344-0510 **Counsel for Lillie Class** 

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 18th day of July, 2019, I served copies of the foregoing

pleading upon all counsel via electronic mail, the Court's electronic filing system or by placing

same in the United States mail, postage prepaid and properly addressed.

<u>s/Phillip W. Preis</u> Phillip W. Preis