

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Matthew T. Zilhaver and Sascha Linn,	x	
Individually and On Behalf of All	:	
Others Similarly Situated,	:	06-CV-2237 (JMR/FLN)
	:	
Plaintiffs,	:	
	:	
vs.	:	
	:	
UNITEDHEALTH GROUP INC.,	:	
L. ROBERT DAPPER, JAMES A.	:	
JOHNSON, WILLIAM G. SPEARS,	:	
MARY O. MUNDINGER, WILLIAM	:	
W. McGUIRE, and STEPHEN J.	:	
HEMSLEY,	:	
	:	
Defendants.	:	
	:	
	X	

**PLAINTIFFS’ MOTION FOR CLASS CERTIFICATION
AND FOR RELATED RELIEF**

Plaintiffs Matthew T. Zilhaver and Sascha Linn hereby move this Court for an Order:

1. Certifying this action as a class action under Fed. R. Civ. P. 23(a) and (b)(1) and or (b)(2);

2. Certifying the following class:

All participants in the UnitedHealth Group 401(k) Savings Plan (the “Plan”) for whose individual accounts the Plan held shares of UnitedHealth Group, Inc. common stock as part of the UnitedHealth Group Stock Fund investment option in the Plan at any time between December 21, 2005 and May 24, 2006, inclusive;

3. Certifying Plaintiffs Matthew T. Zilhaver and Sascha Linn as the representatives of the certified class; and

4. Appointing Stull, Stull & Brody as lead counsel for the certified class and appointing Krause & Rollins as liaison counsel for the certified class.

The grounds for this Motion are set forth in the Memorandum of Law served and filed herewith.

A Proposed Order will be filed in accordance with the Local Rules governing the electronic submission of proposed orders.

Dated: May 1, 2007

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