

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re LEHMAN BROTHERS SECURITIES
AND ERISA LITIGATION

Case No. 09-MD-2017 (LAK)

This Document Applies To:

ECF CASE

*In re Lehman Brothers Equity/Debt
Securities Litigation, 08-CV-5523 (LAK)*

**LEAD PLAINTIFFS' NOTICE OF MOTION AND MOTION
FOR AUTHORIZATION TO NOTIFY THE CLASS OF
PROPOSED SETTLEMENTS AND TO SCHEDULE A SETTLEMENT HEARING**

TO: All Counsel of Record

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law; and all other papers and proceedings herein, Lead Plaintiffs will and hereby do move this Court, under Rule 23(e) of the Federal Rules of Civil Procedure and pursuant to Pretrial Order No. 23 (ECF No. 502), for authorization to provide notice of proposed settlements with certain of the Underwriter Defendants and with former officers and directors of Lehman Brothers ("Lehman"), and to schedule a hearing for consideration of approval of the proposed settlements.

Agreed upon proposed forms of proposed Orders are submitted herewith.

DATED: December 2, 2011

Respectfully Submitted,

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