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February 8, 2012

VIA HAND DELIVERY

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
U.S. Courthouse
500 Pearl Street, Room 1310
New York, NY 10007-1312

MEMO ENDORSED

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FEB - 9 2012
JUDGE KAPLAN'S CHAMBERS

Re: *In re Lehman Bros. Secs. And ERISA Litig., 09-MD-2017*
State Compensation Insurance Fund v. Fuld, et al., 11 Civ. 3892

Dear Judge Kaplan:

We represent the plaintiff in the above-referenced actions ("Plaintiff"). Pursuant to the Court's Pretrial Order No. 23, Plaintiff filed a motion to amend its complaint on November 29, 2011, and filed an amended complaint on January 5, 2012. Out of an abundance of caution, in accordance with Your Honor's Individual Practices, and in lieu of two separate oppositions each with thirty-five page limits, Plaintiff respectfully requests permission to file one omnibus opposition not to exceed 50 pages in response to the motions to dismiss filed by the Individual Defendants and Bank Defendants (and two joinders) on January 6, 2012. We contacted these Defendants' counsel, and they have agreed to the proposal.

A standalone opposition to the motion to dismiss filed by Defendant Ernst & Young LLP will be separately filed by Manatt, Phelps & Phillips LLP.

Very truly yours,



John C. Hueston

cc: Counsel for all parties (via email)

SO ORDERED

Granted
LEWIS A. KAPLAN USDS
2/14/12