

**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*

SUPPLEMENTAL AFFIDAVIT OF STEPHEN J. CIRAMI

STATE OF NEW YORK)
) ss.:
COUNTY OF NASSAU)

STEPHEN J. CIRAMI, being duly sworn, deposes and says:

1. I am a Senior Vice President of Operations for The Garden City Group, Inc. (“GCG”) located at 1985 Marcus Avenue, Suite 200, Lake Success, New York 11042. Pursuant to the Court’s December 15, 2011 Order Concerning Proposed Settlement with the Director and Officer Defendants (“Pretrial Order No. 27”) and the Court’s December 15, 2011 Order Concerning Proposed Settlement with the Settling Underwriter Defendants (“Pretrial Order No. 28”) (collectively, the “Notice Orders”), GCG was appointed as the Claims Administrator in connection with the settlement reached with the director and officer defendants in the above-captioned action (the “D&O Settlement”) and the settlements reached with the settling underwriter defendants in the above-captioned action (the “Underwriter Settlement” and,

together with the D&O Settlement, the “Settlements”).¹ I submit this Affidavit as a supplement to my Affidavit dated March 8, 2012 that was attached as Exhibit 2 to the Joint Declaration of David Stickney and David Kessler filed with the Court on March 8, 2012. I have personal knowledge of the facts stated herein.

2. Pursuant to the notice program described in my prior affidavit, beginning on January 18, 2012, GCG commenced mailing of the Notice Packet to potential members of the Settlement Classes and the brokerage firms, banks, institutions and other third-party nominees (“Nominees”) contained in GCG’s Nominee Database. Paragraph 27 of the Notices required that within 14 days of receipt, Brokers and other Nominees who bought Lehman Securities as a nominee for a beneficial owner were to provide to GCG the names and addresses of such persons and entities or request copies of the documents to forward onto these beneficial owners. To the extent that GCG did not receive timely responses from the largest Nominees to which the Notice Packets were mailed, GCG followed up with these Nominees by making phone calls to ensure they received the Notice Packet, and, when someone for the Nominee could not be reached by telephone, GCG sent emails alerting the Nominee of the Notice Packet and GCG’s attempts to reach them by phone. GCG fulfilled requests from Nominees to either mail Notice Packets to beneficial owners or provide Nominees with Notice Packets to forward onto the beneficial owners directly as such requests were received.

3. Through April 2, 2012, GCG has mailed a total of 902,602 copies of the Notice Packet to potential members of the Settlement Classes or their nominees.

¹ All terms with initial capitalizations not otherwise defined herein shall have the meanings ascribed to them in the Notice Orders.

4. As set forth in my prior affidavit, GCG is maintaining a website (www.lehmansecuritieslitigationsettlement.com) dedicated to the Settlements. On March 9, 2012, GCG posted copies of the papers filed in support of the final approval motion and the fee and expense application to the settlement website.²

5. As set forth in my prior affidavit, the Notices informed potential members of the Settlement Classes that written requests for exclusion from one or both of the Settlement Classes were to be sent, such that they were received no later than March 22, 2012, to *In re: Lehman Brothers Equity/Debt Securities Litigation*, c/o GCG, Claims Administrator, P.O. Box 9821, Dublin, OH 40317-5721. GCG has been monitoring all mail delivered to that Post Office Box.

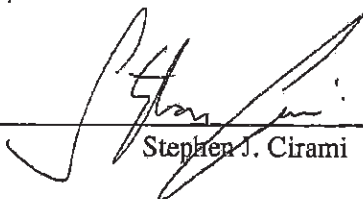
6. As previously reported, as of March 6, 2012, GCG had received 10 requests for exclusion. As of the date of this Affidavit, GCG has received an additional 78 requests for exclusion. As a result, GCG has received requests for exclusion from or on behalf of 88 persons and entities. Specifically, 74 persons and entities have requested exclusion from the D&O Settlement Class, as set forth in Exhibit A, and 64 persons and entities have requested exclusion from the Underwriter Settlement Class, as set forth in Exhibit B.³

² GCG previously posted copies of the Stipulations, the Notice Orders, the Third Amended Class Action Complaint for Violations of the Federal Securities Laws, lists of Eligible Securities, and the Notice Packet to the settlement website on or about January 18, 2012.

³ Together these numbers exceed 88 because persons and entities had the option of requesting exclusion from either or both of the Settlement Classes: 24 requested exclusion only from the D&O Settlement Class, 14 requested exclusion only from the Underwriter Settlement Class, and 50 requested exclusion from both Settlement Classes.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

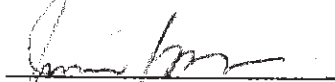
Executed in Lake Success, New York on April 4, 2012.



Stephen J. Cirami

Sworn to before me this

4th day of April, 2012



Notary Public

JAMES GENESS
Notary Public, State of New York
No. 01GE6255504
Qualified in Nassau County
Commission Expires Feb. 06, 20 16

EXHIBIT A

Exhibit A

1. Alternative Benefit Management
c/o Greer, Herz & Adams, L.L.P.
League City, TX
2. American National Life Insurance
Company of Texas ("ANTEX")
c/o Greer, Herz & Adams, L.L.P.
League City, TX
3. Timothy J. Anderson
Atlantic Beach, FL
4. Gregory L. Armstrong
Leeds, AL
5. Ilan Yaacov Ashkenazi
Jerusalem, Israel
6. Anoosh Askari
Santa Monica, CA
7. Nasrin S. Askari (IRA)
Santa Monica, CA
8. Marcel Aubin
Granby, Quebec, Canada
9. Peter G. Babcock
Marietta, GA
10. Michael J. Bartek
West Mifflin, PA
11. Henry V. Becker Sr. Trust U/A Dtd
7/9/2005
c/o Henry Valentine Becker Sr., Trustee
Washoe Valley, NV
12. Sanjay Bhansali
Atlanta, GA
13. California Public Employees' Retirement
System
c/o Robbins Geller Rudman & Dowd LLP
San Diego, CA
14. Catherine Abendano Castelo
Atlanta, GA
15. Carol Ciarco
c/o Dan A. Druz
Lyndhurst, NJ
16. City of Auburn
c/o Cotchett, Pitre & McCarthy, LLP
Burlingame, CA
17. City of Burbank
c/o Cotchett, Pitre & McCarthy, LLP
Burlingame, CA
18. The City of Cerritos
c/o Pearson, Simon, Warshaw & Penny,
LLP
San Francisco, CA
19. City of San Buenaventura
c/o Cotchett, Pitre & McCarthy, LLP
Burlingame, CA
20. The City of South San Francisco
c/o Pearson, Simon, Warshaw & Penny
LLP
San Francisco, CA
21. Comprehensive Investment Services,
Inc.
c/o Greer, Herz & Adams, L.L.P.
League City, TX
22. Continental Casualty Company
c/o CNA
Chicago, IL
23. Contra Costa Water District
c/o Cotchett, Pitre & McCarthy, LLP
Burlingame, CA
24. Contractors Bonding and Insurance Co
c/o Daniel O. Kennedy
Peoria, IL
25. James P. Coughlin
Austin, TX
26. C.V. Starr & Co. Inc. Trust
New York, NY

Exhibit A

27. Stephen J. & Jacqueline W. Edelmann
c/o McCausland Keen & Buckman
Radnor, PA
28. Linda L. Ellis
Oak Ridge, TN
29. Donald E. Groulx
Shirley A. Groulx JT/WROS
Scarborough, Ontario, Canada
30. Halday Holdings Inc.
c/o Louise Halperin
Westmount, Quebec, Canada
31. Ernie Hoechner (Trust & IRA)
c/o Dan A. Druz
S. Burlington, VT
32. Priscilla Hoechner (IRA)
c/o Dan A. Druz
S. Burlington, VT
33. Vincent M. Jackson
Brockton, MA
34. Randy Karp (IRA)
Prescott, AZ
35. Donald P. Lenio (IRA)
Ocala, FL
36. Mildred Mautner Trust UA 8 20 93
Harry Mautner Trust UA 8 20 93
Mildred Mautner & Harry Mautner Tr
Hollywood, FL
37. Jean Guy Messier
c/o Jacqueline Messier Maranda
Saint Hyacinthe, Quebec, Canada
38. Ronald D. Mizrahi ACF
Isaac R. Mizrahi U/NY/UTMA
Brooklyn, NY
39. Ronald D. Mizrahi ACF
Jack R. Mizrahi U/NY/UTMA
Brooklyn, NY
40. Ronald D. Mizrahi
Brooklyn, NY
41. Ronald D. Mizrahi and Sarah Mizrahi
JTWROS
Brooklyn, NY
42. Ronald D. Mizrahi ACF
Raquel Sophie Mizrahi U/NY/UTMA
Brooklyn, NY
43. Ronald D. Mizrahi ACF
Julia Ruth Mizrahi U/NY/UTMA
Brooklyn, NY
44. Ronald D. Mizrahi ACF
Sylvia Joy Mizrahi U/NY/UTMA
Brooklyn, NY
45. The Moody Foundation
c/o Greer, Herz & Adams, L.L.P.
Galveston, TX
46. Monterey County Investment Pool
c/o Cotchett, Pitre & McCarthy, LLP
Burlingame, CA
47. Gary W. Moye
Marietta, GA
48. Mt Hawley Insurance Company
c/o Daniel O. Kennedy
Peoria, IL
49. James E. O'Brien,
James E. O'Brien SEP IRA,
James E. O'Brien M.D. Separate
Property Trust
Manhattan Beach, CA
50. RLI Corp.
c/o Daniel O. Kennedy
Peoria, IL
51. RLI Indemnity Insurance Company
c/o Daniel O. Kennedy
Peoria, IL

Exhibit A

52. RLI Insurance Company
c/o Daniel O. Kennedy
Peoria, IL
53. Norma Rose
Murrieta, CA
54. Michael J. Ryan
Bradenton, FL
55. Lanny Sagal (IRA)
New York, NY
56. San Mateo County Investment Pool
c/o Cotchett, Pitre & McCarthy, LLP
Burlingame, CA
57. Lorraine Senkowsky (IRA)
c/o Dan A. Druz
Lakewood, NJ
58. Dhiaa Shubber
Huntington, CT
59. Starr International USA Investments LC
c/o Starr Insurance Holdings Inc.
New York, NY
60. State Compensation Insurance Fund
c/o Carol R. Newman
San Francisco, CA
61. State of New Jersey, Department of
Treasury, Division of Investment
c/o Berger & Montague, P.C.
Philadelphia, PA
62. Chun P. Tam
Scarborough, Ontario, Canada
63. David Tapia
Chino Valley, AZ
64. Thomas A. Thompson
Franklin, TN
65. Ann Marie Toto
Hamilton, NJ
66. Daniel T. Toto / Toto Grandchildren
Trust
Hamilton, NJ
67. Joseph A. Toto
Hamilton, NJ
68. Vallejo Sanitation and Flood Control
District
c/o Cotchett, Pitre & McCarthy, LLP
Burlingame, CA
69. Donald Vives & Katherine C. Vives
Auburn, AL
70. David Volpe (IRA)
c/o Dan A. Druz
St. Petersburg, FL
71. John & Kim Volpe
c/o Dan A. Druz
Sea Girt, NJ
72. Alan Winters
Renee Winters, JTWROS
Port Washington, NY
73. Bruce P. Wolfe
Van Nuys, CA
74. Zenith Insurance Company
c/o Cotchett, Pitre & McCarthy, LLP
Burlingame, CA

EXHIBIT B

Exhibit B

1. Carol Ahlf
Kinnelon, NJ
2. Alternative Benefit Management
c/o Greer, Herz & Adams, L.L.P.
League City, TX
3. American National Life Insurance
Company of Texas ("ANTEX")
c/o Greer, Herz & Adams, L.L.P.
League City, TX
4. Timothy J. Anderson
Atlantic Beach, FL
5. Gregory L. Armstrong
Leeds, AL
6. Ilan Yaacov Ashkenazi
Jerusalem, Israel
7. Marcel Aubin
Granby, Quebec, Canada
8. Peter G. Babcock
Marietta, GA
9. Sanjay Bhansali
Atlanta, GA
10. California Public Employees' Retirement
System
c/o Robbins Geller Rudman & Dowd LLP
San Diego, CA
11. Caveman Associates, LLC
c/o Phillip Lo Bianco Jr
Pompano Beach, FL
12. Carol Ciarco
c/o Dan A. Druz
Lyndhurst, NJ
13. City of Auburn
c/o Cotchett, Pitre & McCarthy, LLP
Burlingame, CA
14. City of Burbank
c/o Cotchett, Pitre & McCarthy, LLP
Burlingame, CA
15. City of San Buenaventura
c/o Cotchett, Pitre & McCarthy, LLP
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League City, TX
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c/o CNA
Chicago, IL
18. Contra Costa Water District
c/o Cotchett, Pitre & McCarthy, LLP
Burlingame, CA
19. Contractors Bonding and Insurance Co
c/o Daniel O. Kennedy
Peoria, IL
20. James P. Coughlin
Austin, TX
21. Stephen J. & Jacqueline W. Edelman
c/o McCausland Keen & Buckman
Radnor, PA
22. Patsy B. Fernau & Patsy B. Fernau Trust
U/A Dtd 07/1/2007
c/o Camille B. France, Trustee
Woods Cross, UT
23. Jack Gerstenfeld Trust
Eileen Gerstenfeld Trust
c/o Jack Gerstenfeld, Trustee
Palm Beach Gardens, FL
24. Donald E. Groulx
Shirley A. Groulx JT/WROS
Scarborough, Ontario, Canada
25. Halday Holdings Inc.
c/o Louise Halperin
Westmount, Quebec, Canada

Exhibit B

26. Ernie Hoechner (Trust & IRA)
c/o Dan A. Druz
S. Burlington, VT
27. Priscilla Hoechner (IRA)
c/o Dan A. Druz
S. Burlington, VT
28. Jamiscott LLC
c/o Harris & Houghteling LLP
New York, NY
29. Randy Karp (IRA)
Prescott, AZ
30. Donald P. Lenio (IRA)
Ocala, FL
31. Jean Guy Messier
c/o Jacqueline Messier Maranda
Saint Hyacinthe, Quebec, Canada
32. The Moody Foundation
c/o Greer, Herz & Adams, L.L.P.
Galveston, TX
33. Monterey County Investment Pool
c/o Cotchett, Pitre & McCarthy, LLP
Burlingame, CA
34. Mt Hawley Insurance Company
c/o Daniel O. Kennedy
Peoria, IL
35. Edward Muchmore
Iselin, NJ
36. James E. O'Brien,
James E. O'Brien SEP IRA,
James E. O'Brien M.D. Separate
Property Trust
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c/o Daniel O. Kennedy
Peoria, IL
38. RLI Indemnity Insurance Company
c/o Daniel O. Kennedy
Peoria, IL
39. RLI Insurance Company
c/o Daniel O. Kennedy
Peoria, IL
40. Susanne Robbins
Boca Raton, FL
41. Norma Rose
Murrieta, CA
42. Fred G. Rucker
Sarasota, FL
43. Russell T. Rupp
Linda M. Rupp (JTWROS)
Bonita Springs, FL
44. Michael J. Ryan
Bradenton, FL
45. Lanny Sagal (IRA)
New York, NY
46. San Mateo County Investment Pool
c/o Cotchett, Pitre & McCarthy, LLP
Burlingame, CA
47. Leonard Schneider and Lillian Schneider
c/o Harris & Houghteling LLP
New York, NY
48. Lillian Schneider
c/o Harris & Houghteling LLP
New York, NY
49. Susan Schneider
c/o Harris & Houghteling LLP
New York, NY
50. Lorraine Senkowsky (IRA)
c/o Dan A. Druz
Lakewood, NJ
51. Sidney Steinberg
Boca Raton, FL

Exhibit B

52. Chun P. Tam
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c/o Dan A. Druz
St. Petersburg, FL
60. John & Kim Volpe
c/o Dan A. Druz
Sea Girt, NJ
61. Richard Winslow
Flourtown, PA
62. Alan Winters
Renee Winters, JTWROS
Port Washington, NY
63. Bruce P. Wolfe
Van Nuys, CA
64. Zenith Insurance Company
c/o Cotchett, Pitre & McCarthy, LLP
Burlingame, CA