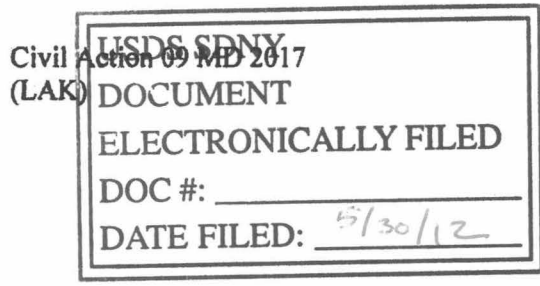


Kaplan, J

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



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In re: :
LEHMAN BROTHERS SECURITIES AND :
ERISA LITIGATION :
This Document Applies to: :
Kaufman v. HSBC USA Inc., et al., No. 09-cv-7900-LAK :
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**JOINT STIPULATION TO EXTEND THE BRIEFING RELATED TO THE LEHMAN
INDIVIDUAL DEFENDANTS' MOTION TO DISMISS FILED JANUARY 6, 2012**

This joint stipulation was entered into on the 29th day of May 2012, by and among Plaintiffs and the Lehman Individual Defendants in the action captioned *Kaufman v. HSBC USA Inc., et al.*, No. 09-cv-7900-LAK (the "*Kaufman* Action").¹

WHEREAS, Plaintiffs and the Lehman Individual Defendants entered into a stipulation dated February 6, 2012 that stayed briefing related to the Lehman Individual Defendants' motion to dismiss Plaintiffs' complaint that was filed on January 6, 2012 (the "February 2012 Stipulation");

WHEREAS, this Court entered the February 2012 Stipulation on February 14, 2012;

WHEREAS, pursuant to the terms of the February 2012 Stipulation, Plaintiffs' opposition to the Lehman Individual Defendants' motion to dismiss is due to this Court by May 29, 2012;

¹ The parties to the *Kaufman* Action are: Plaintiffs Irene Kaufman and Bernice Kaufman, as trustees of the Irene Kaufman Trust, and Lehman Individual Defendants Richard S. Fuld, Jr., Christopher M. O'Meara, Michael L. Ainslie, John F. Akers, Roger S. Berlind, Thomas H. Cruikshank, Marsha Johnson Evans, Sir Christopher Gent, Roland A. Hernandez, Henry Kaufman and John D. Macomber.

WHEREAS, Plaintiffs and the Lehman Individual Defendants continue to discuss resolving the *Kaufman* Action without further litigation;

WHEREAS, the February 2012 Stipulation is the only instance where these parties to the *Kaufman* Action previously moved this Court for an extension of time for, or a stay regarding, papers related to the Lehman Individual Defendants' January 6, 2012 motion to dismiss the *Kaufman* Action.

NOW, THEREFORE, the parties jointly stipulate to the following:

1. The *Kaufman* Action is stayed as to the Lehman Individual Defendants, pending the results of discussions between Plaintiffs' counsel and counsel for the Lehman Individual Defendants.
2. If the parties are unable to come to a resolution of the *Kaufman* Action without further litigation, Plaintiffs' opposition to the Lehman Individual Defendants' motion to dismiss will be due to this Court no later than July 30, 2012.
3. If necessary, and consistent with the terms of the February 2012 Stipulation, the Lehman Individual Defendants' reply to Plaintiffs' opposition shall be due 14 days from the date of Plaintiffs' serving of their opposition.
4. The parties to this Stipulation reserve all rights available to them.

Dated: May 29, 2012
New York, New York

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SO ORDERED:

30 May 2012



U.S.D.J.
Victor Marrero

Part I