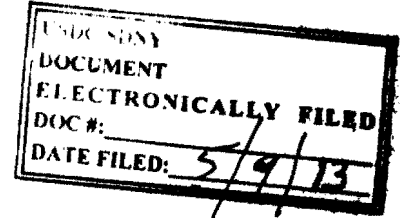


Kaplan, Y.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



In re:

LEHMAN BROTHERS SECURITIES AND
ERISA LITIGATION

This Document Applies Only to:

State Compensation Insurance Fund v. Fuld, et al.
S.D.N.Y. Case No. 1:11-cv-03892-LAK

09 MD 2017 (LAK)

**JOINT STIPULATION FOR EXTENSION OF TIME FOR
DEFENDANTS TO ANSWER THE AMENDED COMPLAINT**

This joint stipulation was entered into on the 3rd day of May 2013, by and among counsel for Plaintiff in the above-captioned action, the Lehman Individual Defendants,¹ and Ernst & Young LLP ("EY").

WHEREAS, on November 29, 2011, Plaintiff filed its Amended Complaint (MDL no. 526-1);

WHEREAS, on January 6, 2012, the Lehman Individual Defendants and EY filed motions to dismiss the Amended Complaint;²

WHEREAS, on March 26, 2013, the Court issued Pretrial Order number 61 granting in part and denying in part the motions to dismiss without prejudice to renewal with respect to the

¹ The Lehman Individual Defendants are comprised of the Lehman Officer Defendants and the Lehman Director Defendants. The Lehman Officer Defendants are Richard S. Fuld, Jr., Christopher M. O'Meara, and Erin M. Callan. The Lehman Director Defendants are 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.

² See MDL nos. 623 (EY's motion), 624 (EY's memorandum in support), 586 (Lehman Individual Defendants' motion), and 588 (Lehman Individual Defendants' memorandum in support).

Securities Act claims after the Court of Appeals for the Second Circuit decides *International Fund Management v. Citigroup, Inc.*, No. 12-1903 (MDL no. 1157);

WHEREAS, Pretrial Order number 61 directed that the defendants on three business days notice, and no later than April 1, 2013, settle an order more fully setting forth the rulings made absent agreement by all parties to this action on the form of order;

WHEREAS, on April 1, 2013, counsel for the Director Defendants submitted a Notice of Settlement of Order Granting in Part and Denying in Part Defendants' Motions to Dismiss Plaintiff's Amended Complaint;

WHEREAS, on April 3, 2013, counsel for Plaintiff submitted a Notice of Counter-Proposal Settlement of Order Granting in Part and Denying in Part Defendants' Motions to Dismiss Plaintiff's Amended Complaint;

WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(4)(A), the deadline for the Lehman Individual Defendants and EY to answer or otherwise respond to the Amended Complaint is fourteen days after the Court enters its final Settled Order Granting in Part and Denying in Part Defendants' Motions to Dismiss Plaintiff's Amended Complaint;

WHEREAS, this is the defendants' first request for an extension of time in connection with an answer or response to the Amended Complaint since the Court's ruling on the Lehman Individual Defendants' and EY's motions to dismiss;

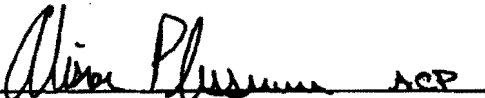
NOW, THEREFORE, the parties jointly stipulate to the following:

1. The time for the Lehman Individual Defendants and EY to answer or otherwise respond to the Amended Complaint shall be extended to on or before 28 days after the parties are given notice of the Court's entry of the final Settled Order Granting in Part and Denying in Part Defendants' Motions to Dismiss Plaintiff's Amended Complaint.

2. The parties to this Stipulation reserve all rights available to them.

Dated: May 3, 2013
New York, New York

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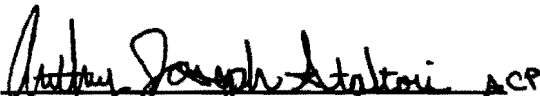
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SO ORDERED:

W. J. ...
U.S.D.J.

5/9/13

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SO ORDERED.

Date: _____

Lewis A. Kaplan
United States District Judge