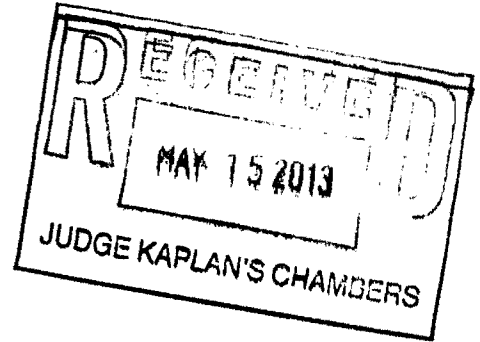
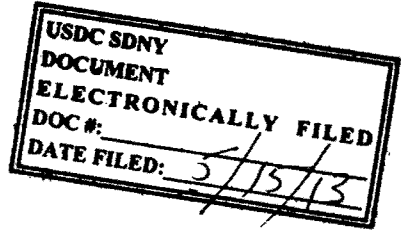


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



-----X
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 :
 :
-----X

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

IRELL & MANELLA LLP


 ACP

By: Alison Plessman
(aplessman@irell.com)

1800 Avenue of the Stars, Suite 900
Los Angeles, CA 90067
Tel: 310-277-1010
Fax: 310-203-7199

*Attorneys for State Compensation Insurance
Fund*

DECHERT LLP

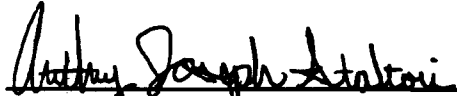
 ACP

By: Andrew J. Levander
(andrew.levander@dechert.com)
Kathleen N. Massey
(kathleen.massey@dechert.com)
Adam J. Wasserman
(adam.wasserman@dechert.com)

1095 Avenue of the Americas
New York, New York 10036
Tel: 212-698-3500
Fax: 212-698-8099

*Attorneys for 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*

MANATT PHELPS & PHILLIPS LLP


 ACP

By: Anthony Joseph Staltari
(astaltari@manatt.com)
Kenneth Benton Julian
(kjulian@manatt.com)
Phillip Robert Kaplan
(pkaplan@manatt.com)

7 Times Square
New York, NY 10019
Tel: 212-790-4500
Fax: 212-790-4545

*Attorneys for State Compensation Insurance
Fund*

ALLEN & OVERY LLP

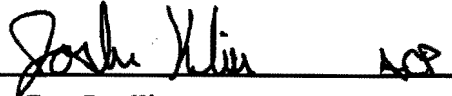
 ACP

By: Patricia M. Hynes
(patricia.hynes@allenoverly.com)
Todd S. Fishman
(todd.fishman@allenoverly.com)

1221 Avenue of the Americas
New York, New York 10020
Tel: 212-610-6300
Fax: 212-610-6399

Attorneys for Richard S. Fuld, Jr.

PETRILLO KLEIN & BOXER LLP

 ACP

By: Guy Petrillo
(gpetrillo@pkblp.com)
Joshua Klein
(jklein@pkblp.com)

655 Third Avenue, 22nd Floor
New York, New York 10017
Tel: 212-370-0334
Fax: 212-609-6921

Attorneys for Christopher M. O'Meara

FINN DIXON & HERLING LLP




By: Alfred U. Pavlis
(apavlis@fdh.com)
Michael Q. English
(menglish@fdh.com)
Richard S. Gora
(rgora@fdh.com)

177 Broad Street
Stamford, Connecticut 06901
Tel: 203-325-5000
Fax: 203-325-5001

Attorneys for Erin M. Callan

LATHAM & WATKINS LLP



By: Miles N. Ruthberg
(miles.ruthberg@lw.com)
Jamie L. Wine
(jamie.wine@lw.com)

885 Third Avenue
New York, New York 10022
Tel: 212-906-1200
Fax: 212-751-4864

Peter A. Wald, *pro hac vice*
(peter.wald@lw.com)

505 Montgomery Street, Suite 2000
San Francisco, CA 94111
Tel: 415-391-0600
Fax: 415-395-8095

Attorneys for Ernst & Young LLP

SO ORDERED.

Date: _____

5/15/13



Lewis A. Kaplan
United States District Judge