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DATE FILED: 5/23/13

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re

Case No. 09-MD 2017 (LAK)

LEHMAN BROTHERS SECURITIES
AND ERISA LITIGATION,

This Document Applies Only to:

*Retirement Housing Foundation and Foundation
Property Management, Inc. v. Richard S. Fuld, Jr.;
Michael L. Ainslie; Roland A. Hernandez; John F.
Akers; Roger S. Berlind; Joseph M. Gregory;
Thomas H. Cruikshank; Marsha Johnson Evans;
Henry Kaufman; John D. Macomber; Christopher
M. O'Meara; Christopher Gent; Erin M. Callan;
Ian T. Lowitt; Ernst & Young, L.L.P.*

Case No. 10-cv-06185-LAK

RECEIVED
MAY 23 2013
JUDGE KAPLAN'S CHAMBERS

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STIPULATION TO EXPAND USE OF DOCUMENTS DESIGNATED CONFIDENTIAL

Plaintiffs Retirement Housing Foundation and Foundation Property Management, Inc.,
and Defendant Christopher M. O'Meara, by and through their respective counsel, jointly
stipulate as follows:

WHEREAS, Plaintiffs and O'Meara signed Pretrial Order No. 57, the Stipulation and
Order for the Production and Exchange of Confidential Information, filed in *In re Lehman
Brothers Securities and ERISA Litigation*, Case No. 09-MD 2017 (LAK);

WHEREAS, the Parties to the above-captioned action (the "Action") are bound by the
provisions of Pretrial Order No. 57;

WHEREAS, O'Meara produced documents in this action with the Bates number prefix
"COM" (the "O'Meara Documents");

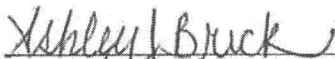
WHEREAS, the O'Meara Documents were designated confidential.

IT IS HEREBY STIPULATED, AGREED and ORDERED that:

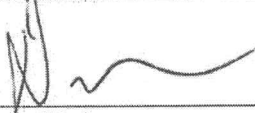
1. Paragraph 4 of Pretrial Order No. 57 shall be amended solely to permit Plaintiff Retirement Housing Foundation or any of its affiliates (collectively, "Plaintiffs") to use the O'Meara Documents in any other legal action or proceeding ("Proceedings") involving Plaintiffs notwithstanding that the O'Meara Documents are designated as "confidential"; provided however, that Plaintiffs shall only produce or disclose the O'Meara Documents, or the contents thereof, in such Proceedings pursuant to a protective order which ensures that all confidential discovery material, including, without limitation, the O'Meara Documents, and any documents or information derived therefrom, shall be used solely for purposes of the Proceedings and provides reasonable steps to safeguard the confidentiality of all confidential discovery material.

Dated: May 20, 2013

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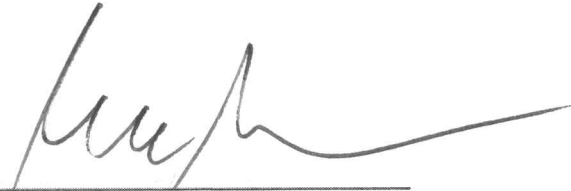
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IT IS SO ORDERED.

Dated: 5/23/13


LEWIS A. KAPLAN
UNITED STATES DISTRICT JUDGE