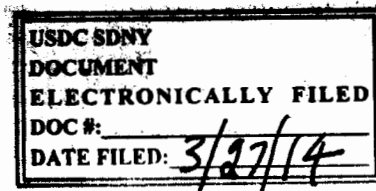


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



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)*

JOINT STIPULATION AND ~~PROPOSED~~ ORDER
PRETRIAL ORDER NO. 82

Lead Plaintiffs¹ and Defendant Ernst & Young, LLP (collectively, the “Parties”), by and through their undersigned counsel, hereby stipulate, subject to Court approval, as follows:

RECITALS

WHEREAS, on December 3, 2013, the Court issued an Order Concerning Proposed Settlement With Defendant Ernst & Young LLP (ECF No. 542), which, among other things, ordered that the Court will hold a settlement hearing (the “Fairness Hearing” or “Settlement Hearing”) on April 15, 2014, at 4:30 p.m., in the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, Courtroom 21B, for the following purposes: (i) to determine whether the Settlement should be approved as fair, reasonable, adequate and in the best interests of the Settlement Class; (ii) to determine whether a Judgment substantially in the form attached as

¹ Lead Plaintiffs are Alameda County Employees’ Retirement Association, Government of Guam Retirement Fund, Northern Ireland Local Government Officers’ Superannuation Committee, City of Edinburgh Council as Administering Authority of the Lothian Pension Fund, and Operating Engineers Local 3 Trust Fund.

Exhibit B to the Stipulation,² should be entered dismissing and releasing the Settled Claims (as that term is defined in the Stipulation) with prejudice; (iii) to rule upon the Plan of Allocation; (iv) to rule upon Co-Lead Counsel's application for an award of attorneys' fees and reimbursement of Litigation Expenses; and (v) to consider any other matters that may properly be brought before the Court in connection with the Settlement; and

WHEREAS, the Class Notice informs potential class members that the Fairness Hearing was scheduled for 4:30 p.m. ET on April 15, 2014. The Class Notice further informs potential class members that the Fairness Hearing "may occur on a different date without additional notice," and refers potential class members to check the settlement website for updated information.

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel as follows:

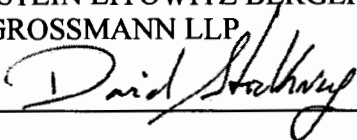
(1) In light of the Passover holiday, the Parties request that the date for the Fairness Hearing be continued until **April 16, 2014**, at ~~4:30 p.m.~~ ^{10:00 AM} ET, in the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, Courtroom 21B, before the Honorable Lewis A. Kaplan;

(2) Co-Lead Counsel shall mail a copy of this Order to class members who have submitted objections or indicated that they may attend the Fairness Hearing; and

(3) Co-Lead Counsel shall cause notice of the continuation to be posted on the settlement website.

BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP

By: _____



LATHAM & WATKINS LLP

By: _____

² References to Stipulation herein are to the Stipulation Of Settlement And Release dated as of November 20, 2013 (the "Stipulation").

Exhibit B to the Stipulation,² should be entered dismissing and releasing the Settled Claims (as that term is defined in the Stipulation) with prejudice; (iii) to rule upon the Plan of Allocation; (iv) to rule upon Co-Lead Counsel's application for an award of attorneys' fees and reimbursement of Litigation Expenses; and (v) to consider any other matters that may properly be brought before the Court in connection with the Settlement; and

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BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP

LATHAM & WATKINS LLP

By: _____

By: *Miles N. Rutledge*

² References to Stipulation herein are to the Stipulation Of Settlement And Release dated as of November 20, 2013 (the "Stipulation").

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*Co-Lead Counsel for Lead Plaintiffs
and the Settlement Class*

SO ORDERED:

Date: 3/27/14


Honorable Lewis A. Kaplan
United States District Judge