

MAILING OF THE EY NOTICE AND EY CLAIM FORM

3. As set forth in the Affidavit of Jose C. Fraga Regarding (A) Mailing of the EY Notice and EY Claim Form; (B) Publication of the EY Summary Notice; (C) Report on Requests for Exclusion Received to Date; and (D) Report on Requests for Removal From the Excluded List by Individual Action Plaintiffs dated March 6, 2014 (the “Mailing Affidavit”), as of March 5, 2014, GCG mailed an aggregate of 916,850 EY Notice Packets to potential members of the EY Settlement Class or nominees and re-mailed an additional 4,072 EY Notice Packets to persons whose original mailing was returned by the U.S. Postal Service and for whom updated addresses were provided to GCG by the U.S. Postal Service.

4. Since the execution of the Mailing Affidavit, GCG has continued to receive requests from potential members of the EY Settlement Class and nominees for copies of the EY Notice Packet. As a result, additional EY Notice Packets have been disseminated such that as of April 3, 2014, GCG has mailed an aggregate of 933,634 EY Notice Packets to potential members of the EY Settlement Class or nominees by first-class mail or bulk mail. In addition, GCG has re-mailed a total of 4,371 EY Notice Packets to persons whose original mailing was returned by the U.S. Postal Service and for whom updated addresses were provided to GCG by the U.S. Postal Service.

WEBSITE

5. As described in the Mailing Affidavit, GCG established and maintains a website (www.LehmanSecuritiesLitigationSettlement.com) dedicated to the prior D&O and UW Settlements and the EY Settlement to assist potential members of the settlement classes. On March 13, 2014, GCG updated the settlement website to include the three following documents: (i) the Memorandum of Law in Support of Lead Counsel’s Motion for an Award Of Attorneys’ Fees and Reimbursement of Litigation Expenses in Connection with the EY Settlement; (ii) the

Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement with Defendant Ernst & Young LLP and Approval of Plan of Allocation; and (iii) the Joint Declaration of David Stickney and David Kessler in Support of (A) Plaintiffs' Motion for Final Approval of Class Action Settlement with Defendant Ernst & Young LLP and Approval of Plan of Allocation and (B) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses. In addition, on March 27, 2014, GCG updated the settlement website to include information about the re-scheduled Settlement Fairness Hearing. Specifically, GCG posted an announcement on the settlement website's home page, posted a link to the Joint Stipulation and Order - Pretrial Order No. 82, and updated the EY Notice that is available for download on the settlement website.

REPORT ON EXCLUSION REQUESTS RECEIVED TO DATE

6. The EY Notice informed potential members of the EY Settlement Class that requests for exclusion are to be mailed, addressed to *In re: Lehman Brothers Equity/Debt Securities Litigation – EY Settlement*, c/o GCG, Claims Administrator, P.O. Box 10025, Dublin, OH 40317-6625, such that they are received by GCG no later than March 25, 2014. The EY Notice also sets forth the information that must be included in each request for exclusion.

7. As reported in the Mailing Affidavit, as of March 5, 2014, GCG had received three requests for exclusion. Mailing Aff. ¶13. Since that date, GCG has received an additional three (3) requests for exclusion received on or before March 25, 2014 (“Timely Exclusion Requests”). In total, as of the date of this Affidavit, GCG has received a total of six (6) Timely Exclusion Requests, on behalf of seven individuals, as set forth in Exhibit A attached hereto. Of the six (6) Timely Exclusion Requests received, only one (1) request included any details regarding their transactions in Lehman Securities. That request included a purchase of \$10,000 Face Value Lehman 5.625% Note, due 2013.

**REPORT ON REQUESTS FOR REMOVAL FROM THE EXCLUDED LIST BY
INDIVIDUAL ACTION PLAINTIFFS**

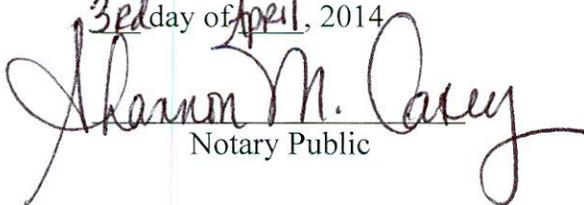
8. The EY Notice informs those plaintiffs named in one of the Individual Actions listed on Appendix C to the EY Notice and excluded by definition from the EY Settlement Class (the "Individual Action Plaintiffs"), that they can request to participate in the EY Settlement by requesting removal from the list of excluded individuals and entities, and that by doing so, they are agreeing to (i) forego their participation in the Individual Action and (ii) not object to any aspect of the Settlement, including the terms of the Settlement set forth in the Stipulation, the proposed Plan of Allocation or Co-Lead Counsel's request for an award of attorneys' fees and reimbursement of Litigation Expenses. Such request for removal must be made in writing and must be received by the Clerk of the Court, United States District Court for the Southern District of New York; Co-Lead Counsel and Counsel for EY by March 25, 2014.

9. As reported in the Mailing Affidavit, Co-Lead Counsel had informed GCG that, as of March 5, 2014, two such requests for removal by Individual Action Plaintiffs have been received. Mailing Aff. ¶15. Since that date, Co-Lead Counsel has informed GCG that one additional request for removal has been received. In total, as of the date of this Affidavit, a total of three requests for removal have been received, two of which are related to plaintiffs in the same Individual Action, as set forth in Exhibit B attached hereto.



Jose C. Fraga

Sworn to before me this
3rd day of April, 2014


Notary Public

SHANNON M. CASEY
Notary Public, State of New York
No. 01CAS131528
Qualified in Kings County
Commission Expires August 8, 2017

EXHIBIT A

EXHIBIT A

1. Robert D. Aitcheson
Rippon, WV
2. Timothy J. Anderson
Atlantic Beach, FL
3. George W. Dignan Jr.
Pittsburgh, PA
4. Mary & Ross Hildreth
Bella Vista, AR
5. Liliane LeBlanc
Montreal, Canada
6. James M. Thompson
Fort Wayne, IN

EXHIBIT B

EXHIBIT B

1. Ben Joseph Trust
Epstein Real Estate Advisory Retirement Trust, et al. v. Fuld, et al., Case No. 10-cv-05617-LAK (U.S. Dist. Ct. SDNY)

2. Epstein Real Estate Advisory Retirement Trust
Epstein Real Estate Advisory Retirement Trust, et al. v. Fuld, et al., Case No. 10-cv-05617-LAK (U.S. Dist. Ct. SDNY)

3. Sylvia Remer
Sylvia Remer v. Fuld, et al., Case No. 10-cv-02926-LAK (U.S. Dist Ct. SDNY)