

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:
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LEHMAN BROTHERS SECURITIES AND	:
ERISA LITIGATION	: Civil Action 09 MD 2017
	: (LAK)
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This Document Applies to:	:
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<i>In re Lehman Brothers Equity/Debt Securities</i>	: <u>RULE 7.1 STATEMENT</u>
<i>Litigation, 08 Civ. 5523 (LAK)</i>	:
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In accordance with Federal Rule of Civil Procedure 7.1, the undersigned counsel for defendants ABN AMRO Holding N.V., ANZ Securities, Inc., Banc of America Securities LLC, BBVA Securities, Inc., BNY Mellon Capital Markets, LLC, Cabrera Capital Markets LLC, Calyon Securities (USA) Inc., Charles Schwab & Co., Inc., CIBC World Markets Corp., Citigroup Global Markets Inc., Commerzbank Capital Markets Corp., DnB NOR Markets Inc. (the trade name of which is DnB NOR Markets), DZ Financial Markets LLC, Fidelity Capital Markets Services (a division of National Financial Services LLC), RBS Greenwich Capital, BMO Capital Markets Corp. (f/k/a Harris Nesbitt Corp.), HSBC Securities (USA) Inc., Loop Capital Markets LLC, Mellon Financial Markets, LLC (n/k/a BNY Mellon Capital Markets, LLC), Merrill Lynch, Pierce, Fenner & Smith, Inc., Mizuho Securities USA Inc., Morgan Stanley & Co. Inc., Muriel Siebert & Co., Inc., nabCapital Securities, LLC, National Australia Bank Limited, Raymond James & Associates, Inc., RBC Capital Markets Corp. (f/k/a RBC Dain Rauscher Inc.), Santander Investment Securities Inc., Scotia Capital (USA) Inc., Siebert Capital Markets (the advertising name of Muriel Siebert & Co., Inc.), SG Americas Securities, LLC,

Sovereign Securities Corporation, LLC, SunTrust Robinson Humphrey, Inc., TD Securities (USA) LLC, UBS Securities LLC, Utendahl Capital Partners, L.P., Wachovia Capital Markets LLC, Wachovia Securities, LLC, Wells Fargo Securities, LLC and The Williams Capital Group, L.P. states as follows:

ABN AMRO Holding, N.V. is a wholly owned subsidiary of RFS Holdings B.V., a non-public entity. The primary shareholders of RFS Holdings B.V. are Royal Bank of Scotland PLC (“RBS”), Santander Central Hispano SA (“Santander”) and the state of the Netherlands (successor to Fortis Group NV). RBS and Santander are publicly held entities.

ANZ Securities, Inc. is an indirectly wholly owned subsidiary of Australia and New Zealand Banking Group Limited (“ANZ”). ANZ has no parent company, and no publicly traded company owns a beneficial interest in more than 10% of the ordinary shares of ANZ.

Banc of America Securities LLC is indirectly wholly owned by Bank of America Corporation, a publicly traded corporation. No publicly held corporation owns 10% or more of Bank of America Corporation.

BBVA Securities, Inc. is a wholly owned subsidiary of Banco Bilbao Vizcaya Argentaria, S.A. No publicly held corporation owns 10% or more of Banco Bilbao Vizcaya Argentaria, S.A.

BNY Mellon Capital Markets, LLC (which was formerly named Mellon Financial Markets, LLC and is the successor-in-interest to BNY Capital Markets, Inc.) is a wholly owned subsidiary of The Bank of New York Mellon Corporation. No publicly held corporation owns 10% or more of The Bank of New York Mellon Corporation.

Cabrera Capital Markets LLC is a privately held company. No publicly held company owns 10% or more of Cabrera Capital Markets LLC.

Calyon Securities (USA), Inc. is a subsidiary of Calyon, securities of which are not publicly traded. Credit Agricole S.A., a publicly traded French institution, owns more than 10% of Calyon.

The Charles Schwab Corporation is the parent corporation of Charles Schwab & Co., Inc. The Charles Schwab Corporation is a publicly traded company. No publicly held corporation owns 10% or more of the stock of The Charles Schwab Corporation.

CIBC World Markets Corp. is a wholly owned subsidiary of Canadian Imperial Bank of Commerce, which is a publicly traded company. No publicly held company owns 10% or more of Canadian Imperial Bank of Commerce's stock.

Citigroup Global Markets Inc. is a wholly owned subsidiary of Citigroup Financial Products Inc., which, in turn, is a wholly owned subsidiary of Citigroup Global Markets Holdings, Inc., which, in turn, is a wholly owned subsidiary of Citigroup, Inc. No publicly held corporation owns 10% or more of Citigroup, Inc.

Commerzbank Capital Markets Corporation is a wholly owned subsidiary of Commerzbank AG. No publicly traded company owns 10% or more of Commerzbank AG.

DnB NOR Markets Inc. (the trade name of which is DnB NOR Markets) is a wholly-owned subsidiary of DnB NOR Bank ASA, which, in turn, is a wholly-owned subsidiary of DnB NOR ASA. The Norwegian state and DnB NOR Savings Bank Foundation own more than 10% of the stock of DnB NOR ASA. No publicly held corporation owns 10% or more of DnB NOR Savings Bank Foundation.

DZ Financial Markets LLC is a wholly owned subsidiary of DZ Bank AG. DZ Bank AG does not have any corporate or other parent corporation or any publicly held corporation that owns 10% or more of its stock.

Fidelity Capital Markets Services is a division of National Financial Services LLC (“NFS”). NFS is a wholly owned subsidiary of FMR LLC (“Fidelity”). Fidelity is not a publicly traded corporation. No publicly traded corporation owns 10% or more of the stock of Fidelity.

RBS Greenwich Capital is a wholly owned subsidiary of Greenwich Capital Holdings, Inc. (GCH). No publicly held company owns 10% or more of RBS Greenwich Capital’s stock. GCH is a privately held corporation that is an indirect but wholly owned subsidiary of RBS Group. Other than RBS Group, no publicly held company owns 10% or more of GCH’s stock. No publicly held company owns 10% or more of RBS Group’s stock.

BMO Capital Markets Corp., formerly known as Harris Nesbitt Corp., is indirectly wholly owned by Bank of Montreal. No publicly held corporation owns 10% or more of Bank of Montreal.

HSBC Securities (USA) Inc. is wholly owned by HSBC Markets (USA) Inc., which, in turn, is wholly owned by HSBC Investments (North America) Inc., which, in turn, is wholly owned by HSBC North America Holdings Inc., which, in turn, is indirectly held by HSBC Overseas Holdings (UK) Limited and HSBC Holdings plc. Upon information and belief, no publicly traded company owns more than 10% of the stock of HSBC Overseas Holdings (UK) Limited or HSBC Holdings plc.

Loop Capital Markets LLC is a privately held company. No publicly held company owns 10% or more of Loop Capital Markets LLC.

Mellon Financial Markets, LLC is now known as BNY Mellon Capital Markets, LLC, which is a wholly owned subsidiary of The Bank of New York Mellon Corporation. No publicly held corporation owns 10% or more of The Bank of New York Mellon Corporation.

Merrill Lynch, Pierce, Fenner & Smith, Inc. is a wholly-owned subsidiary of Merrill Lynch & Co., Inc. Merrill Lynch & Co., Inc. is a direct subsidiary of Bank of America Corporation, which owns all of the common stock of Merrill Lynch & Co., Inc. Bank of America Corporation is a publicly held company whose shares are traded on the New York Stock Exchange. It has no parent company and no publicly-held company owns more than 10% of Bank of America Corporation's shares.

The parent company of Mizuho Securities USA Inc. is Mizuho Securities Co., Ltd.; the parent company of Mizuho Securities Co., Ltd., is Mizuho Corporate Bank, Ltd.; the parent company of Mizuho Corporate Bank, Ltd. is Mizuho Financial Group, Inc.; no publicly held corporation owns 10% or more of Mizuho Securities USA Inc.'s stock.

Morgan Stanley & Co. Inc. ("Morgan Stanley") is a publicly held corporation that has no parent corporation. Based on Securities and Exchange Commission Rules regarding beneficial ownership, State Street Bank & Trust Company, 225 Franklin Street, Boston, Massachusetts 02210, beneficially owned 12.97% of Morgan Stanley's stock (based on a Schedule 13G filed February 12, 2008 by State Street, acting in various fiduciary capacities). On October 13, 2008, Mitsubishi UFJ Financial Group, Inc. ("MUFG") 7-1 Marunouchi 2-chome, Chiyoda-ku, Tokyo 100-8330, Japan, acquired 7,839,209 shares of Series B Non-Cumulative Non-Voting Perpetual Convertible Preferred Stock (the "Series B Preferred Stock"), that, subject to regulatory and shareholder approvals, are convertible at any time into shares of common stock of Morgan Stanley (based on a Schedule 13D filed October 23, 2008 by MUFG). Upon a determination by MUFG to exercise its right to convert the Series B Preferred Stock, MUFG's Series B Preferred Stock would be converted into common stock, resulting in an approximately

22.62% beneficial interest in Morgan Stanley's common stock (based on a Schedule 13D filed October 23, 2008 by MIJFG).

Muriel Siebert & Co., Inc. is a wholly owned subsidiary of Siebert Financial Corp. No publicly traded corporation owns 10% or more of Siebert Financial Corp.

nabCapital Securities, LLC, is a wholly owned subsidiary of National Australia Bank Limited, a publicly traded company. As of October 31, 2008, the companies that own 10% or more of National Australia Bank Limited's stock are National Nominees Limited, HKBA Nominees Limited, and Chase Manhattan Nominees Limited.

National Australia Bank Limited is a publicly traded company. As of October 31, 2008, the companies that own 10% or more of National Australia Bank Limited's stock are National Nominees Limited, HKBA Nominees Limited, and Chase Manhattan Nominees Limited.

Raymond James & Associates, Inc. is a wholly owned subsidiary of Raymond James Financial, Inc. Raymond James Financial, Inc. is a publicly traded company. There are no publicly held entities that own 10% or more of the stock of Raymond James Financial, Inc.

RBC Dain Rauscher Inc. is now part of a merged entity known as RBC Capital Markets Corporation, which is a wholly owned subsidiary of Royal Bank of Canada. RBC Dain Rauscher Inc. merged with RBC Capital Markets Corporation on March 3, 2008, forming a new entity named RBC Capital Markets Corporation. No publicly held corporation owns 10% or more of Royal Bank of Canada.

Santander Investment Securities, Inc. is an indirect, wholly owned subsidiary of Banco Santander, S.A., which is a publicly traded corporation. There is no publicly traded corporation that owns more than 10% of the stock of Banco Santander, S.A.

Scotia Capital (USA) Inc. is a wholly owned subsidiary of Scotia Capital Inc. Scotia Capital Inc. is 95% owned by the Bank of Nova Scotia, and 5% owned by Scotia Securities, Inc., which, in turn, is wholly owned by the Bank of Nova Scotia. No publicly traded company owns 10% or more of the Bank of Nova Scotia.

Siebert Capital Markets is the advertising name of Muriel Siebert & Co., Inc., which is a wholly owned subsidiary of Siebert Financial Corp. No publicly traded corporation owns 10% or more of Siebert Financial Corp.

SG Americas Securities, LLC is a limited liability company and wholly owned by SG Americas Securities Holdings, LLC. SG Americas Securities Holdings, LLC is a wholly owned subsidiary of Société Générale, S.A., which is a publicly traded company. Upon information and belief, no other publicly held corporation owns 10% or more of Société Générale, S.A.¹

Sovereign Securities Corporation, LLC is a wholly owned subsidiary of Sovereign Bank, which, in turn, is a wholly owned subsidiary of Sovereign Bancorp, Inc., which, in turn, is wholly owned by Banco Santander, S.A., a publicly traded corporation. There is no publicly traded corporation that owns more than 10% of the stock of Banco Santander, S.A.

SunTrust Robinson Humphrey, Inc., formerly known as SunTrust Capital Markets, Inc., is a wholly owned subsidiary of SunTrust Banks, Inc. There are no publicly held corporations that own 10% or more of SunTrust Banks, Inc.

TD Securities (USA) LLC is a wholly owned subsidiary of The Toronto-Dominion Bank, which is a publicly traded company. No publicly held company owns 10% or more of The Toronto-Dominion Bank.

¹ The complaint also names SG Corporate and Investment Banking (“SGCIB”). SGCIB is not a corporate entity; rather it is a division of the Société Générale Group.

The corporate parents of UBS Securities LLC are UBS A.G. and UBS Americas Inc., the latter of which is wholly owned by UBS A.G. No publicly held corporation owns 10% or more of UBS A.G.

Utendahl Capital Partners, L.P. is a Delaware limited partnership and Utendahl Partners, L.P. is the general partner. Utendahl Partners, L.P. has no subsidiaries or affiliates that are publicly held, and no publicly held corporation owns 10% or more of the stock of Utendahl Partners, L.P.

Wachovia Capital Markets, LLC is a wholly owned subsidiary of the EVEREN Capital Corporation, which is a wholly owned subsidiary of A.G. Edwards, Inc., which is a wholly owned subsidiary of Wachovia Corporation, which is a wholly owned subsidiary of Wells Fargo & Company, a publicly held company. No publicly held corporation owns 10% or more of Wells Fargo & Company.

Wachovia Securities, LLC² is a wholly owned subsidiary of Wachovia Securities Financial Holdings, LLC, which is a subsidiary of Wachovia Securities Holdings, LLC, which is a wholly owned subsidiary of EVEREN Capital Corporation, which is a wholly owned subsidiary of A.G. Edwards, Inc., which is a wholly owned subsidiary of Wachovia Corporation, which is a wholly-owned subsidiary of Wells Fargo & Company, a publicly held company. No publicly held corporation owns 10% or more of Wells Fargo & Company. The non-affiliate ownership of Wachovia Securities Financial Holdings, LLC is Prudential Securities Group, Inc., with 38% ownership.

Wells Fargo Securities, LLC is a subsidiary of Wells Fargo & Company, a publicly held company. No publicly held corporation owns 10% or more of Wells Fargo & Company.

The Williams Capital Group, L.P. is a limited partnership of which the general partner is The Williams Capital Group, Inc. One of the limited partners of The Williams Capital Group, L.P. is HVB U.S. Finance, Inc., a private corporation, which, in turn, is indirectly owned by UniCredit Group, a publicly held company. No other publicly-held company has an interest of 10% or more in The Williams Capital Group, L.P.

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March 12, 2009

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² Wachovia Securities, LLC is not an underwriter of the Lehman Brothers Holdings Inc. securities offerings at issue in this case and has therefore been improperly named as a defendant. Wachovia Capital Markets, LLC also does business under the trade name "Wachovia Securities."

DZ Financial Markets LLC, Fidelity Capital Markets Services (a division of National Financial Services LLC), RBS Greenwich Capital, BMO Capital Markets Corp. (f/k/a Harris Nesbitt Corp.), HSBC Securities (USA) Inc., Loop Capital Markets, LLC, Mellon Financial Markets, LLC (n/k/a BNY Mellon Capital Markets, LLC), Merrill Lynch, Pierce, Fenner & Smith, Inc., Mizuho Securities USA, Inc., Morgan Stanley & Co. Inc., Muriel Siebert & Co., Inc., nabCapital Securities, LLC, National Australia Bank Limited, Raymond James & Associates, Inc., RBC Capital Markets Corp. (f/k/a RBC Dain Rauscher Inc.), Santander Investment Securities Inc., Scotia Capital (USA) Inc., Siebert Capital Markets (the advertising name of Muriel Siebert & Co., Inc.), SG Americas Securities LLC, Sovereign Securities Corporation, LLC, SunTrust Robinson Humphrey, Inc., TD Securities (USA) LLC, UBS Securities LLC, Utendahl Capital Partners, L.P., Wachovia Capital Markets LLC, Wachovia Securities, LLC, Wells Fargo Securities, LLC and The Williams Capital Group L.P.