

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

LEHMAN BROTHERS SECURITIES AND
ERISA LITIGATION

This Document Applies to:

*In re Lehman Brothers Equity/Debt Securities
Litigation, 08 Civ. 5523 (LAK)*

Civil Action 09 MD 2017 (LAK)

ECF CASE

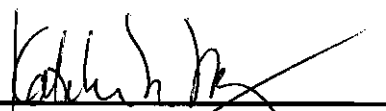
NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the Director Defendants' Motion To Dismiss the Third Amended Complaint, Declaration of Kathleen N. Massey and all of the pleadings and proceedings herein, Defendants 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 (collectively, the "Director Defendants"), by and through their undersigned attorneys, will move this Court before the Honorable Lewis Kaplan, at the United States Courthouse, 500 Pearl Street, Courtroom 12D, New York, New York 10007, at a date and time to be determined by the Court, for an order, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing all of Plaintiffs' claims in their entirety and with prejudice as to the Director Defendants, and for such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the stipulation of the parties and order of the Court, opposition papers, if any, shall be served and filed on or before June 30, 2010, and reply papers, if any, shall be served and filed on or before July 13, 2010.

Dated: June 4, 2010
New York, New York

DECHERT LLP

By: 

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