

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS SECURITIES AND
ERISA LITIGATION

This Document Applies to:

*In re Lehman Brothers Mortgage-Backed
Securities Litigation, No. 08-CV-67762.*

09 MD 2017 (LAK)

MAY 13 2010

MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for
the Southern and Eastern Districts of New York, I, S. Douglas Bunch, a member in good
standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice*
of:

Matthew B. Kaplan
Cohen Milstein Sellers & Toll PLLC
1100 New York Avenue, N.W.
West Tower, STE 500
Washington, D.C. 20005
Telephone: 202-408-4600
Facsimile: 202-408-4699
Email: mkaplan@cohenmilstein.com

Matthew B. Kaplan is a member in good standing of the Bars of Virginia (admitted June
3, 2004, Bar No. 51027), the United States District Court for the Eastern District of Virginia
(admitted 2004), the United States District Court for the Western District of Virginia (admitted
2004), the District of Columbia Bar (admitted January 9, 2004, Bar No. 484760), the United
States Court of Appeals for the District of Columbia (admitted September 17, 2007), the United

FILED COURT
U.S. DISTRICT COURT
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S.D.N.Y.

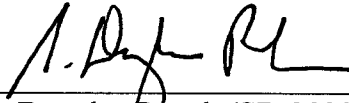
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States Court of Appeals for the Fifth Circuit (admitted November 15, 2006), the United States Court of Appeals for the Ninth Circuit (admitted February 27, 2009), the United States Court of Appeals for the Eleventh Circuit (admitted September 20 2007), and the United States Bankruptcy Court for the Eastern District of Virginia (admitted 2004). I am a member in good standing in every jurisdiction where I have been admitted to practice.

There are no disciplinary proceedings pending against Matthew B. Kaplan in any State or Federal Court.

Dated: May 5, 2010
Washington, D.C.

Respectfully submitted,



S. Douglas Bunch (SB-3028)
Cohen Milstein Sellers & Toll PLLC
1100 New York Avenue, N.W.
West Tower, STE 500
Washington, D.C. 20005
Telephone: 202-408-4600
Facsimile: 202-408-4699
Email: dbunch@cohenmilstein.com

Counsel for Lead Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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_____)	

**AFFIDAVIT OF S. DOUGLAS BUNCH IN SUPPORT OF MOTION
TO ADMIT COUNSEL *PRO HAC VICE***

I, S. Douglas Bunch, being duly sworn, hereby depose and say as follows:

1. I am an attorney at Cohen Milstein Sellers & Toll PLLC, counsel for Lead Plaintiffs in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Lead Plaintiffs' motion to admit Matthew B. Kaplan as counsel *pro hac vice* to represent Lead Plaintiffs in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice on January 24, 2007.

3. I have known Matthew B. Kaplan since September 4, 2006.

4. Matthew B. Kaplan is an associate at Cohen Milstein Sellers & Toll PLLC's Washington, DC office.

5. I have found Matthew B. Kaplan to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

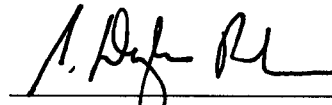
6. Accordingly, I am pleased to move the admission of Matthew B. Kaplan, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Matthew B. Kaplan, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Matthew B. Kaplan *pro hac vice*, to represent Lead Plaintiffs in the above-captioned matter, be granted.

Date: May 5, 2010
Washington, D.C.

Respectfully submitted,



S. Douglas Bunch
SDNY Bar No. SB-3028

**UNITED STATES DISTRICT COURT
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**[PROPOSED] ORDER FOR ADMISSION
PRO HAC VICE ON WRITTEN MOTION**

Upon the motion of S. Douglas Bunch, attorney for Lead Plaintiffs, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

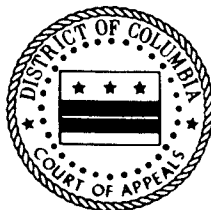
Matthew B. Kaplan
Cohen Milstein Sellers & Toll PLLC
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West Tower, STE 500
Washington, D.C. 20005
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is admitted to practice *pro hac vice* as counsel for Lead Plaintiffs in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system,

counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Date: _____
New York, New York

Honorable Lewis A. Kaplan
United States District Judge



District of Columbia Court of Appeals
Committee on Admissions
430 F Street, N.W. — Room 123
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

MATTHEW B KAPLAN

was on the 9TH day of NOVEMBER, 2004

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on May 4, 2010.

GARLAND PINKSTON, JR., CLERK

By: *P. Pendergast*
Deputy Clerk



VIRGINIA STATE BAR

CERTIFICATE OF GOOD STANDING

THIS IS TO CERTIFY THAT MATTHEW BRYCE KAPLAN IS AN ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN GOOD STANDING. MR. KAPLAN WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON APRIL 25, 2003, AFTER SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.

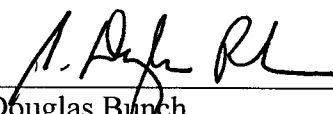
Issued May 6, 2010

A handwritten signature in black ink, appearing to read "Karen A. Gould".

KAREN A. GOULD
EXECUTIVE DIRECTOR AND
CHIEF OPERATING OFFICER

CERTIFICATE OF SERVICE

I, S. Douglas Bunch, hereby certify that on May 11, 2010, I caused the foregoing documents to be filed by hand with the United States District Court for the Southern District of New York. All Counsel of record were served with copies of the foregoing documents via electronic mail on May 12, 2010.



S. Douglas Bunch