

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

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In re:	: 09 MD 2017 (LAK)
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LEHMAN BROTHERS SECURITIES AND	: :
ERISA LITIGATION	: ECF CASE
	: :
This Document Applies to:	: :
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<i>In re Lehman Brothers Mortgage-Backed</i>	: :
<i>Securities Litigation, No 08-CV-6762.</i>	: :
	: :
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**NOTICE OF PLAINTIFFS' MOTION FOR LIMITED RELIEF
FROM THE PSLRA DISCOVERY STAY**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Their Motion for Limited Relief from the PSLRA Discovery Stay, Lead Plaintiff Locals 302 and 612 of the International Union of Operating Engineers – Employers Construction Industry Retirement Trust (the “Operating Engineers” or the “Lead Plaintiff”), Plaintiff New Jersey Carpenters Health Fund (the “New Jersey Carpenters”) and Plaintiff Boilermakers-Blacksmith National Pension Trust (the “Boilermakers”) (collectively, “Plaintiffs”), by and through their undersigned attorneys, will move this Court before the Honorable Lewis A. Kaplan, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 12D, New York, New York 10007, on such date as the Court will determine, for an Order granting Plaintiffs’ motion for partial modification of the discovery stay imposed by the Private Securities Litigation Reform Act of 1995.

Dated: New York, New York
October 22, 2009

COHEN MILSTEIN SELLERS & TOLL PLLC

By: /s/ Christopher Lometti
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CERTIFICATE OF SERVICE

I, Kenneth M. Rehns, hereby certify that on October 22, 2009, I caused the foregoing document to be filed electronically with the United States District Court for the Southern District of New York through the Court's mandated ECF service. Counsel of record are required by the Court to be registered e-filers, and as such are automatically e-served with a copy of the document(s) upon confirmation of e-filing.

/s/ Kenneth M. Rehns
Kenneth M. Rehns