

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re LEHMAN BROTHERS SECURITIES AND
ERISA LITIGATION

Case No. 09-MD-2017 (LAK)

ECF CASE

This Document Applies To:

*In re Lehman Brothers Equity/Debt
Securities Litigation, 08-CV-5523-LAK*

**SUMMARY NOTICE OF PENDENCY OF CLASS ACTION AND
PROPOSED \$99 MILLION CASH SETTLEMENT WITH DEFENDANT ERNST &
YOUNG LLP, SETTLEMENT FAIRNESS HEARING, AND MOTION FOR
ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

TO: ALL INVESTORS WHO (A) PURCHASED OR OTHERWISE ACQUIRED LEHMAN SECURITIES IDENTIFIED IN APPENDIX A TO THE STIPULATION OF SETTLEMENT AND RELEASE WITH ERNST & YOUNG LLP ("EY") DATED NOVEMBER 20, 2013 (THE "STIPULATION"), (B) PURCHASED OR OTHERWISE ACQUIRED LEHMAN STRUCTURED NOTES IDENTIFIED IN APPENDIX B TO THE STIPULATION, AND/OR (C) PURCHASED OR OTHERWISE ACQUIRED LEHMAN COMMON STOCK OR CALL OPTIONS AND/OR SOLD LEHMAN PUT OPTIONS, DURING THE SETTLEMENT CLASS PERIOD OF JUNE 12, 2007 TO SEPTEMBER 15, 2008, THROUGH AND INCLUSIVE (THE "SETTLEMENT CLASS"). CERTAIN PERSONS ARE EXCLUDED FROM THE DEFINITION OF THE SETTLEMENT CLASS, AS SET FORTH IN DETAIL IN THE STIPULATION.

PLEASE READ THIS NOTICE CAREFULLY. YOUR RIGHTS WILL BE AFFECTED BY A CLASS ACTION LAWSUIT PENDING IN THIS COURT.

YOU ARE HEREBY NOTIFIED, pursuant to Rule 23 of the Federal Rules of Civil Procedure and Order of the United States District Court for the Southern District of New York, that the above-captioned litigation ("Action") has been preliminarily certified as a class action for the purposes of settlement only and that a settlement has been proposed with EY for \$99 million in cash. A hearing will be held before the Honorable Lewis A. Kaplan, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, Courtroom 21B, at 4:30 p.m. on April 15, 2014, to, among other things: determine whether the proposed Settlement should be approved by the Court as fair, reasonable, and adequate; determine whether the proposed Plan of Allocation for distribution of the settlement proceeds should be approved as fair and reasonable; and consider the application of Co-Lead Counsel for an award of attorneys' fees and reimbursement of expenses.

IF YOU ARE A MEMBER OF THE SETTLEMENT CLASS DESCRIBED ABOVE, YOUR RIGHTS WILL BE AFFECTED BY THE PENDING ACTION AND THE SETTLEMENT, AND YOU MAY BE ENTITLED TO SHARE IN THE SETTLEMENT FUND. If you have not yet received copies of the full printed Notice for the Settlement, with the attached Claim Form, you may obtain a copy of these documents by contacting the Claims Administrator: *In re Lehman Brothers Equity/Debt Securities Litigation – EY Settlement*, c/o GCG, Claims Administrator, P.O. Box 10025, Dublin, OH 43017-6625, (888) 499-2911. Copies of the Notice for the Settlement and the Claim Form can also be downloaded from the website maintained by the Claims Administrator, www.LehmanSecuritiesLitigationSettlement.com, or from Co-Lead Counsel's websites www.blbglaw.com and www.ktmc.com.

If you previously submitted a valid Claim Form in connection with the prior settlement in this Action with certain Lehman directors and officers (the "D&O Settlement") or the prior settlements in this Action with certain underwriter defendants (the "UW Settlements") it is not necessary to resubmit a Claim Form. Your previously submitted Claim Form will be processed in connection with this Settlement. If you did not previously submit a valid Claim Form in connection with the D&O or UW Settlements and you are a Settlement Class Member, in order to be potentially eligible to share in the distribution of the Net Settlement Fund in connection with this Settlement, you must submit a Claim Form postmarked on or before April 17, 2014.

To exclude yourself from the Settlement Class in the EY Settlement, you must submit a written request for exclusion such that it is *received* no later than March 25, 2014, in accordance with the instructions set forth in the Notice. Please Note: Submission of a request for exclusion from the settlement class in one or both of the D&O or UW Settlements, or any other settlement, *does not* automatically exclude you from the Settlement Class in connection with this Settlement. A request for exclusion that does not specify which Settlement Class you are seeking exclusion from, if received after the filing of the Stipulation, will be interpreted as a request for exclusion from the EY Settlement Class. If you are a Settlement Class Member and do not exclude yourself from the Settlement Class, you will be bound by the Judgment entered in the Action, including the releases provided for in the Judgment, whether or not you submit a Claim Form. If you submit a request for exclusion, you will have no right to recover money pursuant to the Settlement and will have to pursue any claims against the defendant independently. Co-Lead Counsel offer no opinion on whether or not you will be able to maintain such claims and recommend that you secure counsel in connection with this decision.

Note that plaintiffs named in the Individual Actions listed on Appendix C to the Stipulation who do not request removal from the excluded list in accordance with Paragraph 34 of the Stipulation and the instructions set forth in the Notice are excluded from the Settlement Class. Such written request for removal must be *received* by Co-Lead Counsel and EY's Counsel, and filed with the Court, no later than March 25, 2014.

Any objections to the proposed Settlement, the proposed Plan of Allocation, or the request for attorneys' fees and reimbursement of expenses, must be filed with the Court and delivered to Co-Lead Counsel for the Settlement Class and counsel for EY such that they are *received* no later than March 25, 2014, in accordance with the instructions set forth in the Notice.

PLEASE DO NOT CONTACT THE COURT OR THE CLERK'S OFFICE REGARDING THIS NOTICE. Inquiries, other than requests for the Notice or Claim Form, may be made to Co-Lead Counsel:

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By Order of the Court