



together with the D&O Settlement, the “Settlements”).<sup>1</sup> I submit this Affidavit as a supplement to my Affidavit dated March 8, 2012 that was attached as Exhibit 2 to the Joint Declaration of David Stickney and David Kessler filed with the Court on March 8, 2012. I have personal knowledge of the facts stated herein.

2. Pursuant to the notice program described in my prior affidavit, beginning on January 18, 2012, GCG commenced mailing of the Notice Packet to potential members of the Settlement Classes and the brokerage firms, banks, institutions and other third-party nominees (“Nominees”) contained in GCG’s Nominee Database. Paragraph 27 of the Notices required that within 14 days of receipt, Brokers and other Nominees who bought Lehman Securities as a nominee for a beneficial owner were to provide to GCG the names and addresses of such persons and entities or request copies of the documents to forward onto these beneficial owners. To the extent that GCG did not receive timely responses from the largest Nominees to which the Notice Packets were mailed, GCG followed up with these Nominees by making phone calls to ensure they received the Notice Packet, and, when someone for the Nominee could not be reached by telephone, GCG sent emails alerting the Nominee of the Notice Packet and GCG’s attempts to reach them by phone. GCG fulfilled requests from Nominees to either mail Notice Packets to beneficial owners or provide Nominees with Notice Packets to forward onto the beneficial owners directly as such requests were received.

3. Through April 2, 2012, GCG has mailed a total of 902,602 copies of the Notice Packet to potential members of the Settlement Classes or their nominees.

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<sup>1</sup> All terms with initial capitalizations not otherwise defined herein shall have the meanings ascribed to them in the Notice Orders.

4. As set forth in my prior affidavit, GCG is maintaining a website ([www.lehmansecuritieslitigationsettlement.com](http://www.lehmansecuritieslitigationsettlement.com)) dedicated to the Settlements. On March 9, 2012, GCG posted copies of the papers filed in support of the final approval motion and the fee and expense application to the settlement website.<sup>2</sup>

5. As set forth in my prior affidavit, the Notices informed potential members of the Settlement Classes that written requests for exclusion from one or both of the Settlement Classes were to be sent, such that they were received no later than March 22, 2012, to *In re: Lehman Brothers Equity/Debt Securities Litigation*, c/o GCG, Claims Administrator, P.O. Box 9821, Dublin, OH 40317-5721. GCG has been monitoring all mail delivered to that Post Office Box.

6. As previously reported, as of March 6, 2012, GCG had received 10 requests for exclusion. As of the date of this Affidavit, GCG has received an additional 78 requests for exclusion. As a result, GCG has received requests for exclusion from or on behalf of 88 persons and entities. Specifically, 74 persons and entities have requested exclusion from the D&O Settlement Class, as set forth in Exhibit A, and 64 persons and entities have requested exclusion from the Underwriter Settlement Class, as set forth in Exhibit B.<sup>3</sup>

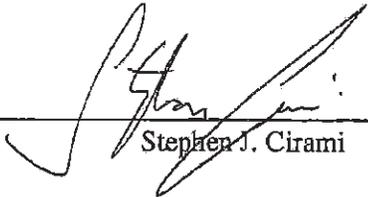
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<sup>2</sup> GCG previously posted copies of the Stipulations, the Notice Orders, the Third Amended Class Action Complaint for Violations of the Federal Securities Laws, lists of Eligible Securities, and the Notice Packet to the settlement website on or about January 18, 2012.

<sup>3</sup> Together these numbers exceed 88 because persons and entities had the option of requesting exclusion from either or both of the Settlement Classes: 24 requested exclusion only from the D&O Settlement Class, 14 requested exclusion only from the Underwriter Settlement Class, and 50 requested exclusion from both Settlement Classes.

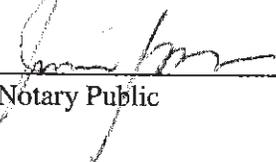
I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Lake Success, New York on April 4, 2012.

  
\_\_\_\_\_  
Stephen J. Cirami

Sworn to before me this

4<sup>th</sup> day of April, 2012

  
\_\_\_\_\_  
Notary Public

**JAMES GENESS**  
Notary Public, State of New York  
No. 01GE6255504  
Qualified in Nassau County  
Commission Expires Feb. 06, 20 16

# **EXHIBIT A**

**Exhibit A**

1. Alternative Benefit Management  
c/o Greer, Herz & Adams, L.L.P.  
League City, TX
2. American National Life Insurance  
Company of Texas ("ANTEX")  
c/o Greer, Herz & Adams, L.L.P.  
League City, TX
3. Timothy J. Anderson  
Atlantic Beach, FL
4. Gregory L. Armstrong  
Leeds, AL
5. Ilan Yaacov Ashkenazi  
Jerusalem, Israel
6. Anoosh Askari  
Santa Monica, CA
7. Nasrin S. Askari (IRA)  
Santa Monica, CA
8. Marcel Aubin  
Granby, Quebec, Canada
9. Peter G. Babcock  
Marietta, GA
10. Michael J. Bartek  
West Mifflin, PA
11. Henry V. Becker Sr. Trust U/A Dtd  
7/9/2005  
c/o Henry Valentine Becker Sr., Trustee  
Washoe Valley, NV
12. Sanjay Bhansali  
Atlanta, GA
13. California Public Employees' Retirement  
System  
c/o Robbins Geller Rudman & Dowd LLP  
San Diego, CA
14. Catherine Abendano Castelo  
Atlanta, GA
15. Carol Ciarco  
c/o Dan A. Druz  
Lyndhurst, NJ
16. City of Auburn  
c/o Cotchett, Pitre & McCarthy, LLP  
Burlingame, CA
17. City of Burbank  
c/o Cotchett, Pitre & McCarthy, LLP  
Burlingame, CA
18. The City of Cerritos  
c/o Pearson, Simon, Warshaw & Penny,  
LLP  
San Francisco, CA
19. City of San Buenaventura  
c/o Cotchett, Pitre & McCarthy, LLP  
Burlingame, CA
20. The City of South San Francisco  
c/o Pearson, Simon, Warshaw & Penny  
LLP  
San Francisco, CA
21. Comprehensive Investment Services,  
Inc.  
c/o Greer, Herz & Adams, L.L.P.  
League City, TX
22. Continental Casualty Company  
c/o CNA  
Chicago, IL
23. Contra Costa Water District  
c/o Cotchett, Pitre & McCarthy, LLP  
Burlingame, CA
24. Contractors Bonding and Insurance Co  
c/o Daniel O. Kennedy  
Peoria, IL
25. James P. Coughlin  
Austin, TX
26. C.V. Starr & Co. Inc. Trust  
New York, NY

**Exhibit A**

27. Stephen J. & Jacqueline W. Edelmann  
c/o McCausland Keen & Buckman  
Radnor, PA
28. Linda L. Ellis  
Oak Ridge, TN
29. Donald E. Groulx  
Shirley A. Groulx JT/WROS  
Scarborough, Ontario, Canada
30. Halday Holdings Inc.  
c/o Louise Halperin  
Westmount, Quebec, Canada
31. Ernie Hoechner (Trust & IRA)  
c/o Dan A. Druz  
S. Burlington, VT
32. Priscilla Hoechner (IRA)  
c/o Dan A. Druz  
S. Burlington, VT
33. Vincent M. Jackson  
Brockton, MA
34. Randy Karp (IRA)  
Prescott, AZ
35. Donald P. Lenio (IRA)  
Ocala, FL
36. Mildred Mautner Trust UA 8 20 93  
Harry Mautner Trust UA 8 20 93  
Mildred Mautner & Harry Mautner Tr  
Hollywood, FL
37. Jean Guy Messier  
c/o Jacqueline Messier Maranda  
Saint Hyacinthe, Quebec, Canada
38. Ronald D. Mizrahi ACF  
Isaac R. Mizrahi U/NY/UTMA  
Brooklyn, NY
39. Ronald D. Mizrahi ACF  
Jack R. Mizrahi U/NY/UTMA  
Brooklyn, NY
40. Ronald D. Mizrahi  
Brooklyn, NY
41. Ronald D. Mizrahi and Sarah Mizrahi  
JTWROS  
Brooklyn, NY
42. Ronald D. Mizrahi ACF  
Raquel Sophie Mizrahi U/NY/UTMA  
Brooklyn, NY
43. Ronald D. Mizrahi ACF  
Julia Ruth Mizrahi U/NY/UTMA  
Brooklyn, NY
44. Ronald D. Mizrahi ACF  
Sylvia Joy Mizrahi U/NY/UTMA  
Brooklyn, NY
45. The Moody Foundation  
c/o Greer, Herz & Adams, L.L.P.  
Galveston, TX
46. Monterey County Investment Pool  
c/o Cotchett, Pitre & McCarthy, LLP  
Burlingame, CA
47. Gary W. Moye  
Marietta, GA
48. Mt Hawley Insurance Company  
c/o Daniel O. Kennedy  
Peoria, IL
49. James E. O'Brien,  
James E. O'Brien SEP IRA,  
James E. O'Brien M.D. Separate  
Property Trust  
Manhattan Beach, CA
50. RLI Corp.  
c/o Daniel O. Kennedy  
Peoria, IL
51. RLI Indemnity Insurance Company  
c/o Daniel O. Kennedy  
Peoria, IL

Exhibit A

52. RLI Insurance Company  
c/o Daniel O. Kennedy  
Peoria, IL
53. Norma Rose  
Murrieta, CA
54. Michael J. Ryan  
Bradenton, FL
55. Lanny Sagal (IRA)  
New York, NY
56. San Mateo County Investment Pool  
c/o Cotchett, Pitre & McCarthy, LLP  
Burlingame, CA
57. Lorraine Senkowsky (IRA)  
c/o Dan A. Druz  
Lakewood, NJ
58. Dhiaa Shubber  
Huntington, CT
59. Starr International USA Investments LC  
c/o Starr Insurance Holdings Inc.  
New York, NY
60. State Compensation Insurance Fund  
c/o Carol R. Newman  
San Francisco, CA
61. State of New Jersey, Department of  
Treasury, Division of Investment  
c/o Berger & Montague, P.C.  
Philadelphia, PA
62. Chun P. Tam  
Scarborough, Ontario, Canada
63. David Tapia  
Chino Valley, AZ
64. Thomas A. Thompson  
Franklin, TN
65. Ann Marie Toto  
Hamilton, NJ
66. Daniel T. Toto / Toto Grandchildren  
Trust  
Hamilton, NJ
67. Joseph A. Toto  
Hamilton, NJ
68. Vallejo Sanitation and Flood Control  
District  
c/o Cotchett, Pitre & McCarthy, LLP  
Burlingame, CA
69. Donald Vives & Katherine C. Vives  
Auburn, AL
70. David Volpe (IRA)  
c/o Dan A. Druz  
St. Petersburg, FL
71. John & Kim Volpe  
c/o Dan A. Druz  
Sea Girt, NJ
72. Alan Winters  
Renee Winters, JTWROS  
Port Washington, NY
73. Bruce P. Wolfe  
Van Nuys, CA
74. Zenith Insurance Company  
c/o Cotchett, Pitre & McCarthy, LLP  
Burlingame, CA

# **EXHIBIT B**

**Exhibit B**

1. Carol Ahlf  
Kinnelon, NJ
2. Alternative Benefit Management  
c/o Greer, Herz & Adams, L.L.P.  
League City, TX
3. American National Life Insurance  
Company of Texas ("ANTEX")  
c/o Greer, Herz & Adams, L.L.P.  
League City, TX
4. Timothy J. Anderson  
Atlantic Beach, FL
5. Gregory L. Armstrong  
Leeds, AL
6. Ilan Yaacov Ashkenazi  
Jerusalem, Israel
7. Marcel Aubin  
Granby, Quebec, Canada
8. Peter G. Babcock  
Marietta, GA
9. Sanjay Bhansali  
Atlanta, GA
10. California Public Employees' Retirement  
System  
c/o Robbins Geller Rudman & Dowd LLP  
San Diego, CA
11. Caveman Associates, LLC  
c/o Phillip Lo Bianco Jr  
Pompano Beach, FL
12. Carol Ciarco  
c/o Dan A. Druz  
Lyndhurst, NJ
13. City of Auburn  
c/o Cotchett, Pitre & McCarthy, LLP  
Burlingame, CA
14. City of Burbank  
c/o Cotchett, Pitre & McCarthy, LLP  
Burlingame, CA
15. City of San Buenaventura  
c/o Cotchett, Pitre & McCarthy, LLP  
Burlingame, CA
16. Comprehensive Investment Services,  
Inc.  
c/o Greer, Herz & Adams, L.L.P.  
League City, TX
17. Continental Casualty Company  
c/o CNA  
Chicago, IL
18. Contra Costa Water District  
c/o Cotchett, Pitre & McCarthy, LLP  
Burlingame, CA
19. Contractors Bonding and Insurance Co  
c/o Daniel O. Kennedy  
Peoria, IL
20. James P. Coughlin  
Austin, TX
21. Stephen J. & Jacqueline W. Edelman  
c/o McCausland Keen & Buckman  
Radnor, PA
22. Patsy B. Fernau & Patsy B. Fernau Trust  
U/A Dtd 07/1/2007  
c/o Camille B. France, Trustee  
Woods Cross, UT
23. Jack Gerstenfeld Trust  
Eileen Gerstenfeld Trust  
c/o Jack Gerstenfeld, Trustee  
Palm Beach Gardens, FL
24. Donald E. Groulx  
Shirley A. Groulx JT/WROS  
Scarborough, Ontario, Canada
25. Halday Holdings Inc.  
c/o Louise Halperin  
Westmount, Quebec, Canada

**Exhibit B**

26. Ernie Hoechner (Trust & IRA)  
c/o Dan A. Druz  
S. Burlington, VT
27. Priscilla Hoechner (IRA)  
c/o Dan A. Druz  
S. Burlington, VT
28. Jamiscott LLC  
c/o Harris & Houghteling LLP  
New York, NY
29. Randy Karp (IRA)  
Prescott, AZ
30. Donald P. Lenio (IRA)  
Ocala, FL
31. Jean Guy Messier  
c/o Jacqueline Messier Maranda  
Saint Hyacinthe, Quebec, Canada
32. The Moody Foundation  
c/o Greer, Herz & Adams, L.L.P.  
Galveston, TX
33. Monterey County Investment Pool  
c/o Cotchett, Pitre & McCarthy, LLP  
Burlingame, CA
34. Mt Hawley Insurance Company  
c/o Daniel O. Kennedy  
Peoria, IL
35. Edward Muchmore  
Iselin, NJ
36. James E. O'Brien,  
James E. O'Brien SEP IRA,  
James E. O'Brien M.D. Separate  
Property Trust  
Manhattan Beach, CA
37. RLI Corp.  
c/o Daniel O. Kennedy  
Peoria, IL
38. RLI Indemnity Insurance Company  
c/o Daniel O. Kennedy  
Peoria, IL
39. RLI Insurance Company  
c/o Daniel O. Kennedy  
Peoria, IL
40. Susanne Robbins  
Boca Raton, FL
41. Norma Rose  
Murrieta, CA
42. Fred G. Rucker  
Sarasota, FL
43. Russell T. Rupp  
Linda M. Rupp (JTWROS)  
Bonita Springs, FL
44. Michael J. Ryan  
Bradenton, FL
45. Lanny Sagal (IRA)  
New York, NY
46. San Mateo County Investment Pool  
c/o Cotchett, Pitre & McCarthy, LLP  
Burlingame, CA
47. Leonard Schneider and Lillian Schneider  
c/o Harris & Houghteling LLP  
New York, NY
48. Lillian Schneider  
c/o Harris & Houghteling LLP  
New York, NY
49. Susan Schneider  
c/o Harris & Houghteling LLP  
New York, NY
50. Lorraine Senkowsky (IRA)  
c/o Dan A. Druz  
Lakewood, NJ
51. Sidney Steinberg  
Boca Raton, FL

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Hamilton, NJ
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District  
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Auburn, AL
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c/o Dan A. Druz  
St. Petersburg, FL
60. John & Kim Volpe  
c/o Dan A. Druz  
Sea Girt, NJ
61. Richard Winslow  
Flourtown, PA
62. Alan Winters  
Renee Winters, JTWROS  
Port Washington, NY
63. Bruce P. Wolfe  
Van Nuys, CA
64. Zenith Insurance Company  
c/o Cotchett, Pitre & McCarthy, LLP  
Burlingame, CA