

OMNIBUS OBJECTION 455: EXHIBIT A - NO LIABILITY CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
1 ACORN PARTNERS, LP	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	27121	Undetermined	Undetermined	Claim 27121 is a protective claim pursuant to which claimant alleges that it has no liability to LBHI in connection with a litigation between LBHI and certain third parties, Adv. Pro. No. 09-01062. Claimant is not a party to such litigation, and, in any event, the litigation has been settled. LBHI is not liable to claimant in connection with such litigation or any other matters referenced in the proof of claim.
2 BARRIOS, ROSALINDA; AN INDIVIDUAL	09-10137 (JMP)	BNC Mortgage LLC	09/20/2010	67087	\$250,000.00	\$250,000.00	Claim 67087 is filed against BNC for claims asserted in a complaint (a copy of which is attached to the proof of claim) filed by claimant against BNC and certain third parties in the Superior Court of the State of California. The claim primarily alleges wrongdoing in connection with a foreclosure proceeding that was conducted on or about August 25, 2009. BNC was not involved in the foreclosure proceeding because on June 29, 2009, BNC had assigned all of its rights and interest in the subject premises, loan and deed of trust securing the loan. Moreover, BNC also has no liability with respect to claimant's remaining allegations pertaining to the negotiations and origination of the loan because such allegations: (i) concern wrongdoing committed by individuals and entities other than and unaffiliated with BNC, or is otherwise unspecified as to BNC; (ii) BNC did not have a fiduciary relationship with claimant; and (iii) claimant's factual averments and conclusory allegations do not allege any wrongdoing by BNC or otherwise assert any basis for liability of BNC. It should be noted that the state court proceeding was commenced by claimant on January 8, 2010, after BNC's petition date, in violation of the automatic stay. To the extent the claim is not expunged and the complaint is not dismissed as against BNC, BNC reserves all of its rights relating to claimant's automatic stay violation.
3 CENTRA PARK LLC	08-13555 (JMP)	Lehman Brothers Holdings Inc.	12/04/2009	65850	Undetermined	Undetermined	Claim 65850 is a protective claim pursuant to which claimant alleges that it has no liability to LBHI in connection with a litigation between LBHI and certain third parties, Adv. Pro. No. 09-01062. Claimant is not a party to such litigation, and, in any event, the litigation has been settled. LBHI is not liable to claimant in connection with such litigation or any other matters referenced in the proof of claim.

* - Indicates claim contains unliquidated and/or undetermined amounts

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4 CHAMPION ENERGY SERVICES, LLP	08-13885 (JMP)	Lehman Brothers Commodity Services Inc.	09/22/2009	30550	Undetermined	Undetermined	Claim 30550 is contingent on the possibility that the claimant may have setoff rights on amounts owed under a note issued by claimant and assigned to Lehman Brothers Commodity Services ("LBCS"). LBCS has requested, and the creditor has not provided, any reason to conclude that such setoff rights will accrue.
5 DEKA INTERNATIONAL S.A.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	19988	\$24,653,496.49*	\$24,653,496.49 *	Claim 19988 asserts a claim based on LBHI's purported guarantee of the obligations of Lehman Brothers (Luxembourg) S.A. ("Lehman Lux"), a foreign affiliate of LBHI that is not a Debtor in these jointly administered chapter 11 cases, under a securities lending agreement (the "Agreement"). Lehman Lux borrowed securities under the Agreement and posted collateral to claimant in connection therewith. Claim 19988 incorrectly asserts a gross amount owing under the Agreement and fails to net and reduce the gross amount by the amount of collateral posted by Lehman Lux. According to claimant's own calculations annexed to the proof of claim and LBHI's review of its books and records, Lehman Lux is a net creditor of claimant under the Agreement. Therefore, because Lehman Lux, the primary obligor, has no liability on a net basis to claimant, LBHI cannot be liable to claimant for any purported guarantee of the underlying obligations of Lehman Lux. To the extent the claim is not expunged in its entirety pursuant to this objection, LBHI reserves all of its rights to dispute the validity of the claim on any basis whatsoever.

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6 DEKABANK DEUTSCHE GIROZENTRALE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	27709	\$72,981,090.60*	\$72,981,090.60 *	Claim 27709 asserts a claim based on LBHI's purported guarantee of the obligations of Lehman Brothers (Luxembourg) S.A. ("Lehman Lux"), a foreign affiliate of LBHI that is not a Debtor in these jointly administered chapter 11 cases, under a securities lending agreement (the "Agreement"). Lehman Lux borrowed securities under the Agreement and posted collateral to claimant in connection therewith. Claim 27709 incorrectly asserts a gross amount owing under the Agreement and fails to net and reduce the gross amount by the amount of collateral posted by Lehman Lux. According to claimant's own calculations annexed to the proof of claim and LBHI's review of its books and records, Lehman Lux is a net creditor of claimant under the Agreement. Therefore, because Lehman Lux, the primary obligor, has no liability on a net basis to claimant, LBHI cannot be liable to claimant for any purported guarantee of the underlying obligations of Lehman Lux. To the extent the claim is not expunged in its entirety pursuant to this objection, LBHI reserves all of its rights to dispute the validity of the claim on any basis whatsoever.

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7 FINANCIAL SERVICES COMPENSATION SCHEME LIMITED, THE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/02/2009	63358	Undetermined	Undetermined	Claim 63358 asserts, among other things, a guarantee claim against LBHI in connection with securities issued by Lehman Brothers Bankhaus AG containing ISIN's DE000A0SGX09, DE000A0SGX17, DE000A0SGX25, DE000A0SGXX1, DE000A0SGXY9, and DE000A0SGXZ6 (such securities, the "LBB Securities," and such portion of Claim 63358 relating to the LBB Securities, the "Guarantee Claim"). Claimant has no standing to assert the Guarantee Claim. Claimant held no claim against LBHI for LBB Securities on LBHI's petition date and held no claim for LBB Securities as of the bar date for filing prepetition proofs of claim. Claimant improperly filed the Guarantee Claim as a speculative placeholder in an attempt to preserve guarantee claims related to primary obligations which Claimant hoped it may later acquire. Claimant asserts it did, subsequent to the bar date, acquire rights related to LBB Securities from various individuals (the "Original Creditors"). Claimant can have no rights greater than those of the Original Creditors. The Original Creditors have no claims against LBHI related to LBB Securities because such claims have been expunged by prior order of the Court. Claim 63358 is being expunged solely with respect to the Guarantee Claim. All other portions of Claim 63358 already have been expunged or withdrawn by the claimant.

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8 INTERNATIONAL FUND MANAGEMENT S.A.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	19986	\$43,249,153.35*	\$43,249,153.35 *	Claim 19986 asserts a claim based on LBHI's purported guarantee of the obligations of Lehman Brothers (Luxembourg) S.A. ("Lehman Lux"), a foreign affiliate of LBHI that is not a Debtor in these jointly administered chapter 11 cases, under a securities lending agreement (the "Agreement"). Lehman Lux borrowed securities under the Agreement and posted collateral to claimant in connection therewith. Claim 19986 incorrectly asserts a gross amount owing under the Agreement and fails to net and reduce the gross amount by the amount of collateral posted by Lehman Lux. According to claimant's own calculations annexed to the proof of claim and LBHI's review of its books and records, Lehman Lux is a net creditor of claimant under the Agreement. Therefore, because Lehman Lux, the primary obligor, has no liability on a net basis to claimant, LBHI cannot be liable to claimant for any purported guarantee of the underlying obligations of Lehman Lux. To the extent the claim is not expunged in its entirety pursuant to this objection, LBHI reserves all of its rights to dispute the validity of the claim on any basis whatsoever.
9 INTERNATIONAL FUND MANAGEMENT S.A.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	19987	\$40,169,117.79*	\$40,169,117.79 *	Claim 19987 asserts a claim based on LBHI's purported guarantee of the obligations of Lehman Brothers (Luxembourg) S.A. ("Lehman Lux"), a foreign affiliate of LBHI that is not a Debtor in these jointly administered chapter 11 cases, under a securities lending agreement (the "Agreement"). Lehman Lux borrowed securities under the Agreement and posted collateral to claimant in connection therewith. Claim 19987 incorrectly asserts a gross amount owing under the Agreement and fails to net and reduce the gross amount by the amount of collateral posted by Lehman Lux. According to claimant's own calculations annexed to the proof of claim and LBHI's review of its books and records, Lehman Lux is a net creditor of claimant under the Agreement. Therefore, because Lehman Lux, the primary obligor, has no liability on a net basis to claimant, LBHI cannot be liable to claimant for any purported guarantee of the underlying obligations of Lehman Lux. To the extent the claim is not expunged in its entirety pursuant to this objection, LBHI reserves all of its rights to dispute the validity of the claim on any basis whatsoever.

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10 SEIKALY, RONY	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	27139	Undetermined	Undetermined	Claim 27139 is a protective claim pursuant to which claimant alleges that it has no liability to LBHI in connection with a litigation between LBHI and certain third parties, Adv. Pro. No. 09-01062. Claimant is not a party to such litigation, and, in any event, the litigation has been settled. LBHI is not liable to claimant in connection with such litigation or any other matters referenced in the proof of claim.
TOTAL					\$181,302,858.23	\$181,302,858.23	

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