

Presentment Date and Time: September 28, 2011 at 12:00 noon (Prevailing Eastern Time)
Objection Deadline: September 27, 2011 at 11:00 a.m. (Prevailing Eastern Time)
Hearing Date and Time (Only if Objection Filed): October 19, 2011 at 10:00 a.m. (Prevailing Eastern Time)

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

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In re : Chapter 11 Case No.
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : 08-13555 (JMP)
Debtors. : (Jointly Administered)
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**STIPULATION, AGREEMENT AND
ORDER BETWEEN THE DEBTORS AND DANSKE
BANK A/S LONDON BRANCH PROVIDING FOR CERTAIN EXTENSIONS OF TIME**

TO THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE:

This Stipulation, Agreement and Order (the “Stipulation, Agreement and Order”) is entered into by and between Lehman Brothers Holdings Inc. (“LBHI”) and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors-in-possession (collectively, the “Debtors”), and Danske Bank A/S London Branch (“Danske London”). Each of the Debtors and Danske London may be referred to herein as a “Party” and together, the “Parties”.

RECITALS

A. On September 15, 2008 and periodically thereafter, LBHI and its affiliated debtors in the above-referenced chapter 11 cases (collectively, the “Debtors”) commenced with this Court voluntary cases under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).

B. On September 18, 2009, Danske London filed claims against the Debtors, a list of which is attached hereto as Schedule A (the “Claims”).

C. On September 1, 2011, the Debtors filed the Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, ECF No. 19627 (the “Plan”) and, by order dated September 1, 2011, ECF No. 19631 (the “Disclosure Statement Order”), the Bankruptcy Court approved the Disclosure Statement relating thereto, filed September 1, 2011, ECF No. 19629 (the “Disclosure Statement”).

D. The Disclosure Statement Order provides, in pertinent part, as follows¹:

- The deadline for filing and serving objections to claims solely for purposes of determining which claimant/creditors are entitled to vote to accept or reject the Plan (“Objections for Voting Purposes”) is September 16, 2011 or as otherwise ordered by the Court or agreed by the relevant parties (the “Voting Purposes Objection Deadline”). *Id.* at ¶ 4.
- All Temporary Allowance Request Motions shall be filed and served on or before the 14th day after the later of (i) service of the Confirmation Hearing Notice and (ii) service of notice of an objection, if any, as to that specific claim, but in no event later than October 7, 2011. *Id.* at ¶ 6(1).
- Any order temporarily allowing claims for which a Temporary Allowance Request Motion has been filed shall be entered on or before November 4, 2011 or as otherwise ordered by the Court at any time. *Id.* at ¶ 6(4).

¹ Terms not defined herein shall have the meaning ascribed to them in the Disclosure Statement Order.

E. The Parties are engaged in negotiations regarding the allowance of the Claims. They have agreed that the time for the Debtors to file an Objection for Voting Purposes with respect to the Claims should be extended to September 30, 2011.

IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN THE PARTIES, THROUGH THEIR UNDERSIGNED COUNSEL, AND, UPON COURT APPROVAL HEREOF, IT SHALL BE ORDERED THAT:

1. This Stipulation, Agreement and Order shall have no force or effect unless and until approved by the Court (the “Effective Date”).
2. The following deadlines shall apply with respect to the Claims:
 - The Voting Purposes Objection Deadline shall be September 30, 2011.
 - Any Temporary Allowance Request Motion to be filed by Danske London shall be filed on or before October 21, 2011.
 - Any order approving a Temporary Allowance Request Motion shall be entered on or before November 21, 2011, or as otherwise ordered by the Court at any time.
3. This Stipulation, Agreement and Order may only be amended or otherwise modified by a signed writing executed by the Parties.
4. Each person who executes this Stipulation, Agreement and Order by or on behalf of a Party represents and warrants that he or she has been duly authorized and empowered to execute and deliver this Stipulation, Agreement and Order on behalf of such Party.
5. This Stipulation, Agreement and Order may be executed in counterparts, each of which shall be deemed an original but all of which together shall constitute one and the same instrument, and it shall constitute sufficient proof of this Stipulation, Agreement and Order to present any copy, copies, electronic copies, or facsimiles signed by the Parties.
6. This Court shall retain jurisdiction to resolve any disputes or controversies arising from this Stipulation, Agreement and Order.

Dated: September 20, 2011
New York, New York

/s/ Jacqueline Marcus
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Dated: September 20, 2011
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Attorneys for Danske Bank A/S London Branch

SO ORDERED, this ___ day of September 2011 in New York

United States Bankruptcy Judge

SCHEDULE A: LIST OF CLAIMS

Claim Number	Debtor	Date Filed
19487	LCPI	9/18/2009
17247	LBHI	9/18/2009