

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

In re

LEHMAN BROTHERS INC.,

Debtor.

Case No. 08-01420 (JMP) SIPA

STIPULATION AND ORDER STAYING CERTAIN LITIGATIONS

This Stipulation and Order Staying Certain Litigations (the “Stipulation and Order”) is entered into between James W. Giddens, as trustee (the “Trustee”) for the liquidation of Lehman Brothers Inc. (“LBI”) under the Securities Investor Protection Act of 1970, as amended, 15 U.S.C. §§ 78aaa *et seq.* (“SIPA”), and Anthony Victor Lomas, Steven Anthony Pearson, Derek A. Howell, Paul David Copley, and Russell Downs, as administrators for Lehman Brothers International (Europe) (“LBIE”) (in administration) (the “Joint Administrators”) (the Joint Administrators, together with the Trustee, collectively, the “Parties”);

WHEREAS, the Parties had been litigating the Objection of Lehman Brothers International (Europe) (In Administration) to Trustee’s Determination of Claims, filed on August 1, 2011 (Docket No. 4452) (the “House Proceeding”);

WHEREAS, the Parties had been litigating the Objection of Lehman Brothers International (Europe) (In Administration) to Trustee’s Determination of Claims, filed on October 31, 2011 (ECF No. 4684) (the “Omnibus Proceeding,” and together with the House Proceeding, the “Proceedings”);

WHEREAS, the Parties entered into a definitive settlement agreement on February 21, 2013 (the “Settlement Agreement”) to resolve, *inter alia*, the Proceedings;

WHEREAS, the Trustee filed a motion on February 26, 2013 seeking an order from this Court approving the Settlement Agreement;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, AND UPON COURT APPROVAL HEREOF, IT IS ORDERED THAT:

1. The stay entered by this Court on December 18, 2012 (ECF No. 5563) is extended indefinitely, subject to further order of the Court.
2. The unexpired deadlines in the amended schedule and discovery plan set forth in the order entered by this Court on September 13, 2012 (ECF No. 5291) are each extended indefinitely, subject to further order of the Court.
3. The Parties shall promptly report to this Court should any further scheduling become necessary with respect to the Proceedings.

Dated: March 6, 2013
New York, New York

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Trustee for the SIPA Liquidation of
Lehman Brothers Inc.*

Dated: March 6, 2013
New York, New York

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Dated: March 6, 2013
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SO ORDERED:

Dated: New York, New York
March 11, 2013

s/ James M. Peck
Honorable James M. Peck
United States Bankruptcy Judge