

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE AMBAC FINANCIAL GROUP,
INC. SECURITIES LITIGATION

Case No. 08-cv-00411-NRB

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NOTICE OF LEAD PLAINTIFFS' MOTION FOR (1) FINAL APPROVAL OF SETTLEMENT OF CLAIM FILED IN THE SIPA LIQUIDATION OF LEHMAN BROTHERS INC., (2) APPROVAL OF THE PROPOSED ALLOCATION OF THE PROCEEDS OF THE SETTLEMENT, AND (3) REIMBURSEMENT OF EXPENSES

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Order Preliminarily Approving Proposed Settlement of Claim Filed in the SIPA Proceeding of Lehman Brothers Inc. dated March 11, 2015, and upon (a) the Joint Declaration of Lauren A. Ormsbee and Frederic S. Fox in Support of Lead Plaintiffs' Motion for (1) Final Approval of Settlement of Claim Filed in the SIPA Proceeding of Lehman Brothers Inc., (2) Approval of the Proposed Allocation of the Proceeds of the Settlement, and (3) Reimbursement of Expenses; (b) the accompanying Memorandum of Law; and (c) all other papers and proceedings herein, Lead Plaintiffs the Public School Teachers' Pension & Retirement Fund of Chicago, Arkansas Teacher Retirement System and Public Employees' Retirement System of Mississippi will and do hereby move this Court, before the Honorable Naomi Reice Buchwald, on June 9, 2015 at 10:30 a.m. in Courtroom 21A of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, or at such other location and time as set by the Court, for entry of a Judgment (i) finally approving the proposed Settlement as fair,

reasonable and adequate;¹ (ii) approving the proposed allocation of the funds to be received as a result of the Settlement; and (iii) approving reimbursement of \$79,246.33 for Lead Plaintiffs' remaining expenses in connection with the necessary retention of Bankruptcy Counsel, Lowenstein Sandler LLP.

Dated: May 5, 2015

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

/s/ Lauren A. Ormsbee

Lauren A. Ormsbee
David L. Duncan
1285 Avenue of the Americas, 38th Floor
New York, NY 10019
Tel: (212) 554-1400
Fax: (212) 554-1444

-and-

KAPLAN FOX & KILSHEIMER LLP

Frederic S. Fox
Donald Hall
Hae Sung Nam
850 Third Avenue, 14th Floor
New York, NY 10022
Tel: (212) 687-1980
Fax: (212) 687-7714

*Counsel for Lead Plaintiffs
and Lead Counsel for the Class*

#892394

¹ All terms with initial capitalization not otherwise defined herein have the meanings ascribed to them in the Stipulation Regarding Proofs of Claims of Public School Teachers' Pension, et al. (Nos. 5626, 5627, 5628 and 5629) (ECF No. 177-1).