

## LBHI RMBS Trustees' Notice of Motion Seeking Approval of Settlement in Lehman Bankruptcy Cases

NEW YORK, May XX, 2017/PR Newswire/ -- The following notice is being issued by the RMBS Trustees regarding the filing by the LBHI Debtors of a 9019 Motion Seeking Bankruptcy Court Approval of an RMBS Settlement Agreement Resolving Certain RMBS Trustees' Claims Asserted in the Lehman Bankruptcy Cases.

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

In re Lehman Brothers Holdings Inc., et al., Debtors.

Chapter 11, Case No. 08-13555 (SCC), Jointly Administered

### **NOTICE OF MOTION OF LEHMAN BROTHERS HOLDINGS INC. PURSUANT TO FED. R. BANKR. P. 9019 AND 11 U.S.C. § 105(A) FOR ENTRY OF ORDER (A) APPROVING RMBS SETTLEMENT AGREEMENT, (B) MAKING CERTAIN REQUIRED FINDINGS REGARDING DECISION OF RMBS TRUSTEES AND LBHI DEBTORS TO ENTER INTO RMBS SETTLEMENT AGREEMENT, (C) SCHEDULING ESTIMATION PROCEEDING TO DETERMINE RMBS CLAIMS AND APPROVING RELATED PROCEDURES REGARDING CONDUCT OF HEARING, AND (D) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE** that, on April 27, 2017 Lehman Brothers Holdings Inc. (the "Plan Administrator"), as Plan Administrator under the *Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors*, on behalf of itself and the other affiliated debtors in the above-captioned cases (collectively, the "LBHI Debtors") filed the Motion of Lehman Brothers Holdings Inc. Pursuant To Fed. R. Bankr. P. 9019 And 11 U.S.C. § 105(a) For Entry Of Order (A) Approving RMBS Settlement Agreement, (B) Making Certain Required Findings Regarding Decision Of RMBS Trustees And LBHI Debtors To Enter Into RMBS Settlement Agreement, (C) Scheduling Estimation Proceeding To Determine RMBS Claims And Approving Related Procedures Regarding Conduct Of Hearing, And (D) Granting Related Relief (the "Motion"). Capitalized terms used but not defined herein shall have the meanings given to them in the Motion.

**PLEASE TAKE FURTHER NOTICE** that a hearing will be held on the Motion before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 623, One Bowling Green, New York, New York 10004 (the

“Bankruptcy Court”) on **July 6, 2017 at 10:00 a.m. (prevailing Eastern Time)**, or as soon thereafter as counsel may be heard.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Motion (including approval of the Trustee Findings and the Debtors’ Findings) must be made in writing, state with particularity the grounds therefor, conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, be filed electronically in text searchable portable document format (PDF) with the Court in accordance with General Order M-399 (General Order M-399 can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), the official website for the Court), by registered users of the Court’s case filing system and by all other parties in interest (with a hard copy delivered directly to the Judge’s Chambers), and be served in accordance with General Order M-399, and upon (i) the chambers of the Honorable Shelley C. Chapman, One Bowling Green, New York, New York 10004, Courtroom 23; (ii) Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019 (Attn: Paul V. Shalhoub, Esq. and Todd G. Cosenza, Esq.) and Rollin Braswell Fisher LLC, 8350 East Crescent Parkway, Suite 100, Greenwood Village, Colorado 80111 (Attn: Michael A. Rollin, Esq. and Maritza D. Braswell, Esq.), attorneys for LBHI and certain of its affiliates; (iii) Gibbs & Bruns LLP, 1100 Louisiana, Suite 5300, Houston, Texas 77002 (Attn: Kathy Patrick, Esq. and Robert Madden, Esq.), attorneys for the Institutional Investors; (iv) Chapman & Cutler LLP, 111 West Monroe Street, Chicago, Illinois 60603 (Attn: Franklin H. Top III, Esq. and Scott A. Lewis, Esq.), Morgan, Lewis & Bockius LLP, 101 Park Avenue, New York, New York 10178 (Attn: Michael S. Kraut, Esq.), Seward & Kissel LLP, 1 Battery Park Plaza, New York, New York 10004 (Attn: M. William Munno, Esq. and Daniel E. Guzman, Esq.), Alston & Bird LLP, 1201 West Peachtree Street, Suite 4900, Atlanta, Georgia 30309 (Attn: John C. Weitnauer, Esq.), Holwell Shuster & Goldberg LLP, 750 Seventh Avenue, 26th Floor, New York, New York 10019 (Attn: Michael S. Shuster, Esq.) and Nixon Peabody LLP, 437 Madison Avenue, New York, New York 10022 (Attn: Dennis Drebsky, Esq.), attorneys for the Trustees; and (v) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: William K. Harrington, Esq., Susan D. Golden, Esq., and Andrea B. Schwartz, Esq.) so as to be actually filed and received by no later than **June 22, 2017 at 12:00 noon (EDT)** (the “Objection Deadline”).

**PLEASE TAKE FURTHER NOTICE** that the relief requested in the Motion may be granted without a hearing if no objection is timely filed and served as set forth above and in accordance with the order, dated June 17, 2010, implementing certain notice and case management procedures in these cases (Docket No. 9635) (the “Case Management Order”).

Dated: April 27, 2017  
New York, New York

/s/ Paul V. Shalhoub  
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*Attorneys for Lehman Brothers Holdings Inc. and Certain of Its Affiliates*

The complete 9019 Motion and related exhibits (the "Motion") associated with this Notice can be found for review and downloaded, free of charge, at (i) the website of the Debtors' Claims and Noticing Agent, Epiq Bankruptcy Solutions, LLC ("Epiq") available at <http://dm.epiq11.com/LBH> (the Motion is located within Docket No. 55232) or (ii) the website of the RMBS Trustees' Noticing Agent, The Garden City Group ("GCG") available at [http://lbhirmssettlement.com/pdf/lib/Lehman\\_Brothers\\_Holdings\\_Inc\\_Motion.pdf](http://lbhirmssettlement.com/pdf/lib/Lehman_Brothers_Holdings_Inc_Motion.pdf).

You may also request a copy of the Motion, free of charge, by directly contacting (i) Epiq at (646) 282-2400 or email at [Lehman@epiqsystems.com](mailto:Lehman@epiqsystems.com) or (ii) GCG at (855) 907-3115 or email at [Questions@lbhirmssettlement.com](mailto:Questions@lbhirmssettlement.com).

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SOURCE Garden City Group

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