

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

IN RE INITIAL PUBLIC OFFERING
SECURITIES LITIGATION

This document relates to all cases.

21 MC 92 (SAS)

NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT

PLEASE TAKE NOTICE, that Plaintiffs hereby move for an Order:

- (a) preliminary approving the proposed Stipulation and Agreement of Settlement (“Stipulation”);
- (b) certifying the Settlement Classes for the purposes of the proposed Stipulation only;
- (c) approving the form and program of Class notice described in the Stipulation; and
- (d) scheduling a hearing before the Court to determine whether the proposed Stipulation should be finally approved.

A proposed order granting the relief requested is attached as Exhibit C to Exhibit 1 of the Declaration of Christian Siebott in Support of Motion for Preliminary Approval of Settlement.

April 2, 2009
New York, New York

Respectfully submitted,

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