

Daniel A. Fliman ([DFliman@kasowitz.com](mailto:DFliman@kasowitz.com))  
Michael A. Hanin ([MHanin@kasowitz.com](mailto:MHanin@kasowitz.com))  
KASOWITZ BENSON TORRES LLP  
1633 Broadway  
New York, New York 10019  
Telephone: (212) 506-1700  
Facsimile: (212) 506-1800

Nicole Gueron ([ngueron@cgr-law.com](mailto:ngueron@cgr-law.com))  
Isaac B. Zaur ([izaur@cgr-law.com](mailto:izaur@cgr-law.com))  
CLARICK GUERON REISBAUM LLP  
220 Fifth Avenue, 14th Floor  
New York, New York 10001  
Telephone: (212) 633-4310  
Facsimile: (646) 478-9484

*Counsel for the Investor Group*

**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 WITHDRAWAL OF PRELIMINARY OBJECTION OF THE INVESTOR  
GROUP TO THE MOTION OF LEHMAN BROTHERS HOLDINGS INC.  
PURSUANT TO FED. R. BANKR. P. 9019 AND 11 U.S.C. § 105(a)**

**PLEASE TAKE NOTICE** that on June 6, 2017, certain investors (the “Investor Group”), through undersigned counsel, filed the *Preliminary Objection of the Investor Group to the Motion of Lehman Brothers Holdings Inc. Pursuant to Fed. R. Bankr. P. 9019 and 11 U.S.C. § 105(a)* [Docket No. 55432] (the “Preliminary Objection”).<sup>1</sup>

**PLEASE TAKE FURTHER NOTICE** that the Preliminary Objection relates to the

<sup>1</sup> The holders that constitute the Investor Group are listed in the Preliminary Objection.

*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* [Docket No. 55232] (the “Settlement Motion”).

**PLEASE TAKE FURTHER NOTICE** that, as set forth in the June 27, 2017 letter from counsel to the Plan Administrator to the Court [Docket No. 55650], the Investor Group and the Plan Administrator have resolved the Preliminary Objection and the Investor Group’s opposition to the Settlement Motion.

**PLEASE TAKE FURTHER NOTICE** that the Investor Group hereby withdraws its Preliminary Objection.

Dated: June 29, 2017  
New York, New York

KASOWITZ BENSON TORRES LLP

/s/ Daniel A. Fliman  
Daniel A. Fliman  
([DFliman@kasowitz.com](mailto:DFliman@kasowitz.com))  
Michael A. Hanin  
([MHanin@kasowitz.com](mailto:MHanin@kasowitz.com))  
1633 Broadway  
New York, New York 10019  
Telephone: (212) 506-1700  
Facsimile: (212) 506-1800

*Counsel for the Investor Group*

CLARICK GUERON REISBAUM LLP

/s/ Nicole Gueron  
Nicole Gueron ([ngueron@cgr-law.com](mailto:ngueron@cgr-law.com))  
Isaac B. Zaur ([izaur@cgr-law.com](mailto:izaur@cgr-law.com))  
220 Fifth Avenue, 14th Floor  
New York, New York 10001  
Telephone: (212) 633-4310  
Facsimile: (646) 478-9484

*Conflicts counsel for the Investor Group*