

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE WORLDCOM, INC.	:	MASTER FILE NO.
SECURITIES LITIGATION	:	02 Civ. 3288 (DLC)
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This Document Relates to:		
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02 Civ. 3288	:	02 Civ. 4973
02 Civ. 3416	:	02 Civ. 4990
02 Civ. 3419	:	02 Civ. 5057
02 Civ. 3508	:	02 Civ. 5071
02 Civ. 3537	:	02 Civ. 5087
02 Civ. 3647	:	02 Civ. 5108
02 Civ. 3750	:	02 Civ. 5224
02 Civ. 3771	:	02 Civ. 5285
02 Civ. 4719	:	02 Civ. 8226
02 Civ. 4945	:	02 Civ. 8227
02 Civ. 4946	:	02 Civ. 8228
02 Civ. 4958	:	02 Civ. 8229

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**NOTICE OF MOTION OF LEAD PLAINTIFF  
FOR FINAL APPROVAL OF SETTLEMENT WITH THE CITIGROUP  
DEFENDANTS AND LEAD PLAINTIFF’S PROPOSED PLAN OF ALLOCATION**

**PLEASE TAKE NOTICE** that upon the accompanying Declaration of Jeffrey W. Golan and John P. Coffey in Support of Lead Plaintiff’s Motion for Final Approval of Settlement with the Citigroup Defendants, Lead Plaintiff’s Proposed Plan of Allocation, and Lead Counsel’s Request for an Award of Attorneys’ Fees and Reimbursement of Expenses (“Joint Declaration”); Declaration of Alan P. Lebowitz in Support of Lead Plaintiff’s Motion for Final Approval of Settlement with the Citigroup Defendants, Lead Plaintiff’s Proposed Plan of Allocation, and Lead Counsel’s Request for an Award of Attorneys’ Fees and Reimbursement of Expenses (“Lead Plaintiff Declaration”), and Lead Plaintiff’s Memorandum of Law In Support of the Motion for Final Approval of Settlement with the Citigroup Defendants and Lead Plaintiff’s

Proposed Plan of Allocation, Lead Plaintiff, Alan G. Hevesi, Comptroller of the State of New York, as Administrative Head of the New York State and Local Retirement Systems and as Trustee of the New York State Common Retirement Fund, together with Additional Named Plaintiffs Fresno County Employees Retirement Association, the County of Fresno, California, and HGK Asset Management, Inc., will move this Court, before the Honorable Denise L. Cote, United States District Judge, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, for entry of: (1) a Judgment Approving Settlement and Dismissing Action Against the Citigroup Defendants; and (2) an Order Approving Lead Plaintiff's Plan of Allocation With Respect to Settlement with the Citigroup Defendants, in the forms attached hereto;

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Court's Hearing Order of July 16, 2004, papers in opposition to this motion must be filed and served on or before October

8, 2004, and reply papers in support of this motion must be served on or before October 22, 2004.

Respectfully submitted,

BARRACK, RODOS & BACINE

BERNSTEIN LITOWITZ BERGER  
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