

CONFIDENTIAL -- PORTIONS TO BE FILED UNDER SEAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE WORLDCOM, INC.
SECURITIES LITIGATION

MASTER FILE NO.
02 Civ. 3288 (DLC)

This Document Relates to:

02 Civ. 3288 02 Civ. 4990 02 Civ. 9513 :
02 Civ. 3416 02 Civ. 5057 02 Civ. 9514 :
02 Civ. 3419 02 Civ. 5071 02 Civ. 9515 :
02 Civ. 3508 02 Civ. 5087 02 Civ. 9516 :
02 Civ. 3537 02 Civ. 5108 02 Civ. 9519 :
02 Civ. 3647 02 Civ. 5224 02 Civ. 9521 :
02 Civ. 3750 02 Civ. 5285 02 Civ. 2841 :
02 Civ. 3771 02 Civ. 8226 02 Civ. 3592 :
02 Civ. 4719 02 Civ. 8227 03 Civ. 6229 :
02 Civ. 4945 02 Civ. 8228 03 Civ. 7298 :
02 Civ. 4946 02 Civ. 8229 03 Civ. 7299 :
02 Civ. 4958 02 Civ. 8230 :
02 Civ. 4973 02 Civ. 8234 :

**DECLARATION OF MARK R.
ROSEN IN SUPPORT OF LEAD
PLAINTIFF'S REPLY
MEMORANDUM OF LAW IN
RESPONSE TO MEMORANDA
FILED BY DEFENDANTS ARTHUR
ANDERSEN, LLP, BERT C. ROBERTS,
JR. AND THE UNDERWRITER-
RELATED DEFENDANTS IN
OPPOSITION TO LEAD PLAINTIFF'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT**

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Administrative Head of the New York State and Local Retirement Systems and as Trustee of the
New York State Common Retirement Fund, and Co-Lead Counsel for the Class*

I, Mark R. Rosen, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am an attorney with the law firm of Barrack, Rodos & Bacine, 3300 Two Commerce Square, 2001 Market Street, Philadelphia, Pennsylvania 19103, co-Lead Counsel for 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. I submit this declaration in support of Lead Plaintiff's reply memorandum of law in response to memoranda filed by defendants Arthur Andersen, LLP, Bert C. Roberts, Jr. and the underwriter-related defendants in opposition to Lead Plaintiff's motion for partial summary judgment.

2. True and correct copies of the following documents are annexed to this declaration:

- (a) Declaration of Harris L. Devor;
- (b) Reply Report of Harris L. Devor, and attached thereto
 - (i) Amended Exhibit 5 - Summary of Selected Misstatements
 - (ii) Exhibit 3 - Second Updated Materials Reviewed.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed in Philadelphia, Pennsylvania on October 1, 2004.

Mark R. Rosen