

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 | : | 03 Civ. 2841 |
| 02 Civ. 4946 | : | 03 Civ. 3592 |
| 02 Civ. 4958 | : | 03 Civ. 6229 |
| 02 Civ. 8229 | : | |
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**NOTICE OF MOTIONS OF LEAD COUNSEL FOR AWARDS
OF ATTORNEY’S FEES AND REIMBURSEMENT OF EXPENSES**

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 Settlements with Settling Defendants, Lead Plaintiff’s Proposed Plans of Allocation, Lead Plaintiff’s Proposed Supplemental Plan of Allocation, and Lead Counsel’s Requests for Awards 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 Settlements with Settling Defendants, Lead Plaintiff’s Proposed Plans of Allocation, Lead Plaintiff’s Proposed Supplemental Plan of Allocation, and Lead Counsel’s Requests for Awards of Attorneys’ Fees and Reimbursement of Expenses (“Lead Plaintiff Declaration”), and Lead Plaintiff’s Memorandum of Law In Support of the Motions for Awards of Attorneys’ Fees and Reimbursement of Expenses, Lead Counsel,

the law firms of Barrack Rodos & Bacine and Bernstein Litowitz Berger & Grossmann LLP, 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) an Order Granting Lead Counsel's Motion for an Award of Attorneys' Fees Relating to the Settlements with the Settling Underwriter Defendants; (2) an Order Granting Lead Counsel's Motion for an Award of Attorneys' Fees Relating to the Settlements with the Settling Director Defendants and Arthur Andersen LLP; and (3) an Order Granting Lead Counsel's Motion for Reimbursement of Expenses;

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Hearing Order of June 14, 2005, papers in opposition to these motions must be filed and served on or before August 12, 2005, and reply papers in support of this motion must be served on or before September 2, 2005.

Respectfully submitted,

BARRACK, RODOS & BACINE

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