

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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 SETTLEMENTS WITH THE SETTLING DEFENDANTS AND LEAD
PLAINTIFF’S PROPOSED PLANS 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 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 Final Approval of Settlements with Settling Defendants, Lead Plaintiff's Proposed Plans of Allocation, and Lead Plaintiff's Proposed Supplemental 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) Judgments approving the Settlements with the Settling Defendants; and (2) Orders approving Lead Plaintiff's Plans of Allocation with respect to the Settlements with the Settling Defendants, in the forms attached hereto;

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Hearing Order of June 14, 2005, papers in opposition to this motion or any portion thereof 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, except that papers in opposition to the settlements with Bernard

Ebbers, Scott Sullivan, David Myers and Buford Yates (and the plans of allocation related to the settlements with Ebbers and Sullivan) may be filed and served on or before August 26, 2005.

Respectfully submitted,

BARRACK, RODOS & BACINE

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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*