

Hearing Date: November 22, 2016 at 10:00 a.m. (Prevailing Eastern Time)
Objection Deadline: November 17, 2016 at 4:00 p.m. (Prevailing Eastern Time)

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**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 HEARING OF MOTION OF GORAN PULJIC, T.K.
NARAYAN, SCOTT SNELL, CYNTHIA ZAMORA DANIEL, AND CHRISTOPHER
MONTALVO FOR (I) A DETERMINATION THAT THE AUTOMATIC STAY DOES
NOT APPLY, OR, ALTERNATIVELY, (II) RELIEF FROM THE AUTOMATIC STAY**

PLEASE TAKE NOTICE that Goran Puljic, T.K. Narayan, Scott Snell, Cynthia Zamora Daniel, and Christopher Montalvo, individuals (“Movants”), by and through their attorneys, Venable LLP and Hoguet Newman Regal & Kenney LLP, have filed with the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) a motion (the “Motion”) pursuant to Sections 105(a) and 362(d) of Title 11 of the United States Bankruptcy Code and Rules 4001 and 9014 of the Federal Rules of Bankruptcy Procedure seeking an order (1) that the automatic stay does not apply to a special proceeding that Movants seek to commence in New York State court to stay (*i.e.*, enjoin) an arbitration proceeding (the “Arbitration”) commenced by Lehman Brothers Holdings Inc. (“LBHI”); or (2) in the

alternative, if the automatic stay applies, granting relief from the automatic stay to permit Movants to file a petition to stay or enjoin the Arbitration, together with supporting Declaration of Edward P. Boyle, Esq., dated November 9, 2016, and proposed order.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the relief requested in the Motion shall be held before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, in Courtroom 625 of the Bankruptcy Court, One Bowling Green, New York, New York 10004 on **November 22, 2016 at 10:00 a.m. (prevailing Eastern time)**, or such other time as the Court may determine.

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to the entry of an order granting the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a CD-ROM or 3.5 inch disk, preferably in text-searchable Portable Document Format (PDF) (with a hard copy delivered directly to Chambers) in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov) and shall be served in accordance with General Order M-399 upon (i) the chambers of the Honorable Shelley C. Chapman, One Bowling Green, New York, New York 10004, Courtroom 625; (ii) counsel for LBHI, Weil Gotshal & Manges, 767 Fifth Avenue, New York, New York 10153 (Attn: Jacqueline Marcus); (iii) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: William K. Harrington, Esq.); (iv) counsel for Creditors' Committee, Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York

10005 (Attn: Dennis F. Dunne), (iv) counsel for Cynthia Zamora Daniel and Christopher Montalvo, Hoguet Newman Regal & Kenney, LLP, 10 East 40th Street, New York, New York 10016 (Attn: John P. Curley); (v) counsel for Goran Puljic, T.K. Narayan, and Scott Snell, Venable LLP, 1270 Avenue of the Americas, 24th Flr, New York, New York 10020 (Attn: Edward P. Boyle), and (vi) counsel for LBHI in Arbitration, Paul Hastings, 200 Park Avenue, New York, New York 10166 (Attn: Joshua M. Bennett) so as to be so filed and received by no later than **November 17, 2016, at 4:00 p.m. (Eastern Time) (the “Objection Deadline”)**.

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the Motion or any relief requested therein, the Bankruptcy Court may grant the relief requested in the Motion without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: New York, New York
November 9, 2016

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*Counsel for Cynthia Zamora Daniel and
Christopher Montalvo*

Dated: New York, New York
November 9, 2016

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