

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE MF GLOBAL HOLDINGS
LIMITED SECURITIES LITIGATION

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: Civil Action No. 1:11-CV-07866-VM
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THIS DOCUMENT RELATES TO:

All Securities Actions
(*DeAngelis v. Corzine*)

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: ECF CASE
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**NOTICE OF LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL
OF UNDERWRITER SETTLEMENT AND SETTLING PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF COMMERZ SETTLEMENT**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and upon (i) the Joint Declaration of Salvatore J. Graziano and Javier Bleichmar in Support of Lead Plaintiffs' Motion for Final Approval of Underwriter Settlement and Settling Plaintiffs' Motion for Final Approval of Commerz Settlement (the "Joint Declaration")¹; (ii) the accompanying Memorandum of Law; and (iii) all other papers and proceedings herein: (a) Lead Plaintiffs the Virginia Retirement System and Her Majesty The Queen In Right Of Alberta ("Lead Plaintiffs"), on behalf of themselves and the Underwriter Settlement Class, will and do hereby move this Court, for entry of a judgment approving the Underwriter Settlement as fair, reasonable and adequate; and (b) Lead Plaintiffs and named plaintiff the Government of Guam Retirement Fund (collectively, "Settling Plaintiffs"), on behalf of themselves and the Commerz Settlement Class, will and do hereby move this Court, for entry of a judgment approving the Commerz Settlement

¹ Unless otherwise indicated, all capitalized terms shall have the meanings ascribed to them in the Stipulation and Agreement of Settlement with Certain Underwriter Defendants, dated as of November 25, 2014 (ECF No. 801-1) (the "Underwriter Stipulation"), the Stipulation and Agreement of Settlement with Defendant Commerz Markets LLC, dated as of March 17, 2015 (ECF No. 875-1) (the "Commerz Stipulation"), or the Joint Declaration submitted herewith.

as fair, reasonable and adequate. The motions will be heard before the Honorable Victor Marrero, on June 26, 2015 at 9:30 a.m. in Courtroom 11B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, or at such other location and time as set by the Court.

Dated: May 15, 2015
New York, New York

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

/s/ Salvatore J. Graziano _____

Salvatore J. Graziano
Hannah G. Ross
Jai Chandrasekhar
1285 Avenue of the Americas, 38th Floor
New York, NY 10019
Telephone: (212) 554-1400
Facsimile: (212) 554-1444

*Co-Lead Counsel for Lead Plaintiffs,
Settling Plaintiff Government of Guam
Retirement Fund and the Settlement Classes*

**BLEICHMAR FONTI
TOUNTAS & AULD LLP**

Javier Bleichmar
Dominic J. Auld
Cynthia Hanawalt
7 Times Square, 27th Floor
New York, New York 10036
Telephone: (212) 789-1340
Facsimile: (212) 205-3960

*Co-Lead Counsel for Lead Plaintiffs
and the Settlement Classes*

#897864