

**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 CLASS ACTION SETTLEMENTS AND PLAN OF ALLOCATION**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and upon (a) the Joint Declaration of Salvatore J. Graziano and Javier Bleichmar in Support of: (I) Lead Plaintiffs' Motion for Final Approval of Class Action Settlements and Plan of Allocation, and (II) Co-Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses (the "Joint Declaration");¹ (b) the Memorandum of Law in Support of Lead Plaintiffs' Motion for Final Approval of Class Action Settlements and Plan of Allocation; and (c) all other papers and proceedings herein, Lead Plaintiffs the Virginia Retirement System and Her Majesty The Queen In Right Of Alberta ("Lead Plaintiffs"), on behalf of themselves and the Settlement Classes, will and do hereby move this Court, before the Honorable Victor Marrero, on November 20, 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

¹ Unless otherwise indicated, all capitalized terms have the meanings ascribed to them in the Stipulation and Agreement of Settlement with Defendant PricewaterhouseCoopers LLP dated as of April 3, 2015 (ECF No. 899-1), the Stipulation and Agreement of Settlement with Individual Defendants dated as of July 2, 2015 (ECF No. 969-1), or the Joint Declaration.

set by the Court, for (i) entry a judgment approving the PwC Settlement as fair, reasonable and adequate; (ii) entry of a judgment approving the Individual Defendant Settlement as fair, reasonable and adequate; and (iii) entry of an Order approving the proposed Plan of Allocation as fair and reasonable.

Dated: October 9, 2015
New York, New York

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER
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/s/ Salvatore J. Graziano _____

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