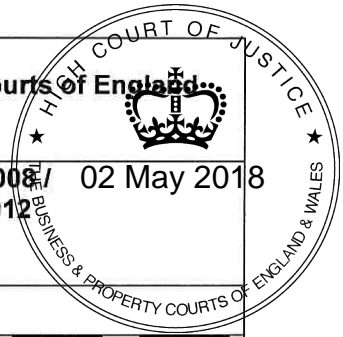




Claim Form (CPR Part 8)

In the High Court of Justice Business and Property Courts of England and Wales Companies Court (ChD)	
Claim no.	No. 7492 of 2008 / 02 May 2018 CR-2008-000012 CR-2018-[*]
Fee Account no.	
Help with Fees Ref no. (if applicable)	H W F - [] CR-2018-003713



Claimant(s)

The joint administrators of Lehman Brothers International (Europe)
(in administration)
PricewaterhouseCoopers LLP
7 More London Riverside
London
SE1 2RT



Defendant(s)

N/A

IN THE MATTER OF LEHMAN BROTHERS INTERNATIONAL (EUROPE) (IN ADMINISTRATION)

-and-

IN THE MATTER OF THE COMPANIES ACT 2006

Does your claim include any issues under the Human Rights Act 1998? [] Yes [X] No

Details of claim (see also overleaf)

The Claimants, being Russell Downs, Anthony Victor Lomas, Steven Anthony Pearson and Julian Guy Parr (in their capacity as the joint administrators of Lehman Brothers International (Europe) (Company No. 02538254) (the "**Company**")), seek the following:

1. Directions as to the convening and conduct of meetings in London of the Company's Scheme Creditors (as defined in the scheme of arrangement hereinafter mentioned) for the purpose of considering and, if thought fit, approving (with or without modifications) a scheme of arrangement proposed to be made under Part 26 of the Companies Act 2006 (the "**Scheme**");

Defendant's name and address N/A

	£
Court fee	£ 280 =
Legal representative's costs	
Issue date	

Claim no.	CR-2018-[●]
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Details of claim (continued)

2. A direction that Russell Downs, or failing him any of the other individuals appointed as a joint administrator of the Company, may be appointed chairman of the meetings and that the Company be directed to file with this Court a copy of a report by the chairman of the meetings;
3. A direction that, subject to approval by the requisite majority of the Scheme Creditors at the meetings, there may be a further hearing (the "Sanction Hearing") and an order may be made sanctioning the Scheme;
4. Directions for the listing of the Sanction Hearing;
5. A declaration that Russell Downs is appointed to act as the Company's foreign representative in relation to any petition brought by the Company before the United States Bankruptcy Court for an order recognising the Scheme as a "foreign main proceeding" under Chapter 15 of the U.S. Bankruptcy Code; and
6. Such further or other relief as the Court sees fit.

Part 8 of the Civil Procedure Rules 1998 applies to this claim which is made pursuant to CPR Part 49 Practice Direction 49A paragraph 15.

The Claimants will rely on the First Witness Statement of Russell Downs of PricewaterhouseCoopers LLP filed herewith in support of this Claim.

Statement of Truth	
* (I believe) (The Claimant believes) that the facts stated in these particulars of claim are true.	
* I am duly authorised by the Claimant to sign this statement.	
Full name	<u>SURAN ROSCOE</u>
Name of claimant's legal representative's firm	LINKLATERS LLP
signed <u>Susan Roscoe</u>	position or office held PARTNER
* (Claimant) (Litigation friend)	(if signing on behalf of firm or company)
(Claimant's legal representative)	
<i>*delete as appropriate</i>	

Linklaters LLP
 One Silk Street
 London
 EC2Y 8HQ

Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.