

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re REFCO, INC. SECURITIES LITIGATION	:	05 Civ. 8626 (JSR)
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NOTICE OF (A) LEAD PLAINTIFFS’ MOTION FOR FINAL APPROVAL OF SETTLEMENTS WITH GRANT THORNTON LLP AND THE SETTLING OFFICER DEFENDANTS, AUTHORIZATION OF APPLICATION OF THE PREVIOUSLY APPROVED PLAN OF ALLOCATION TO THE ADDITIONAL SETTLEMENTS AND FINAL CERTIFICATION OF A CLASS FOR SETTLEMENT PURPOSES, AND (B) LEAD COUNSEL’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that upon the (i) Joint Declaration of Salvatore J. Graziano and Megan D. McIntyre in Support of (A) Lead Plaintiffs’ Motion for Final Approval of Settlements with Grant Thornton LLP and the Settling Officer Defendants, Authorization of Application of the Previously Approved Plan of Allocation to the Additional Settlements and Final Certification of a Class for Settlement Purposes, and (B) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Expenses; (ii) Lead Plaintiffs’ Memorandum of Law in Support of Motion for Final Approval of Settlements with Grant Thornton LLP and the Settling Officer Defendants, Authorization of Application of the Previously Approved Plan of Allocation to the Additional Settlements and Final Certification of a Class for Settlement Purposes; and (iii) Lead Counsel’s Memorandum of Law in Support of Their Motion for an Award of Attorneys’ Fees and Reimbursement of Expenses, being filed concurrently herewith; and all prior proceedings had herein:

(a) Lead Plaintiffs, RH Capital Associates LLC and Pacific Investment Management Company LLC, through their undersigned counsel, will move this Court before the Honorable

Jed S. Rakoff on March 11, 2011 at 4:00 p.m. at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, NY 10007, for entry of (i) Judgments granting final approval to the proposed settlement with Grant Thornton LLP and the proposed settlement with Joseph J. Murphy, Dennis A. Klejna and William M. Sexton, and granting final certification of a Settlement Class for purposes of those settlements, and (ii) an Order authorizing application of the previously approved Plan of Allocation of these settlements; and

(b) Lead Counsel, Grant & Eisenhofer P.A. and Bernstein Litowitz Berger & Grossmann LLP, will move this Court before the Honorable Jed S. Rakoff on March 11, 2011 at 4:00 p.m. at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, NY 10007, for entry of an Order awarding attorneys' fees and reimbursement of expenses.

Dated: New York, New York
February 4, 2011

Respectfully submitted,

GRANT & EISENHOFER P.A.

**BERNSTEIN LITOWITZ BERGER
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- and -

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