

WHEREFORE, Defendant Kenneth Lay respectfully requests that the Court enter an order striking the Pulsifer Class Action Complaint in its entirety. Defendant Kenneth Lay further requests all other relief to which he is justly entitled.

Respectfully submitted,



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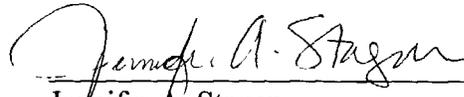
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CERTIFICATE OF SERVICE

Pursuant to the Court's Orders of June 6, 2002 and August 7, 2002, the foregoing document was served electronically to counsel of record on September 30, 2002.



Jennifer A. Stagen