

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

United States Courts  
Southern District of Texas  
FILED

APR 30 2004 **HL**

Michael N. Milby, Clerk of Court

In re ENRON CORPORATION SECURITIES )  
LITIGATION )

\_\_\_\_\_  
This Document Relates To: )

MARK NEWBY, *et al.*, individually and on )  
behalf of all others similarly situated, )

Plaintiffs, )

vs. )

ENRON CORP., *et al.* )

Defendants. )

Civil Action No. H-01-3624  
(Consolidated)

\_\_\_\_\_  
THE REGENTS OF THE UNIVERSITY OF )  
CALIFORNIA, *et al.*, individually and on )  
behalf of all others similarly situated, )

Plaintiffs, )

vs. )

KENNETH L. LAY, *et al.* )

Defendants. )

**LEHMAN BROTHERS HOLDINGS INC.'S AND LEHMAN BROTHERS INC.'S  
ANSWER TO FIRST AMENDED CONSOLIDATED COMPLAINT**

2117

Lehman Brothers Holdings Inc. ("LBHI") and Lehman Brothers Inc. ("LBI," collectively with LBHI, "Lehman") answer the First Amended Consolidated Complaint for Violation of the Securities Laws ("Complaint") as follows:

1. To the extent the allegations set forth in paragraph 1 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman admits that the Complaint purports to assert claims on behalf of a putative class of purchasers of Enron's publicly traded equity and debt securities between October 19, 1998 and November 27, 2001 against the defendants listed in paragraph 1 of the Complaint, but denies any and all liability in this case.<sup>1</sup>

2. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 2 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 2 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 2 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 2 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

3. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 3 of the Complaint to the extent

---

<sup>1</sup> In the "Preamble" to the Complaint, plaintiffs purport to quote from certain magazine and newspaper articles and correspondence. No response to the Preamble is required. Indeed, the Preamble is improper and should be stricken. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the Preamble.

they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 3 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 3 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 3 of the Complaint, except that Lehman admits that Enron restated its financial results and filed for protection under Chapter 11 of the Bankruptcy Code.

4. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 4 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 4 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 4 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 4 of the Complaint, except that Lehman admits upon information and belief that the Securities and Exchange Commission and the Department of Justice are engaged in investigations related to Enron, and that certain Enron officers and employees left Enron and some of them have asserted their rights under the Fifth Amendment to the U.S. Constitution.

5. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 5 of the Complaint.

6. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 6 of the Complaint.

7. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 7 of the Complaint.

8. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 8 of the Complaint.

9. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 9 of the Complaint.

10. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 10 of the Complaint.

11. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 11 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 11 of the Complaint.

12. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 12 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

13. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 13 of the Complaint, except that Lehman admits upon information and belief the allegations contained in the third sentence of paragraph 13.

14. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 14(a) – (b) of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. In addition, to the extent the allegations contained in paragraph 14(a) – (b) of the Complaint are intended to reflect public statements about Enron made by Lehman

during the relevant time period, Lehman denies those allegations to the extent they are inconsistent with those public statements and further denies those allegations to the extent that they are intended to suggest in any way that any public statement about Enron by Lehman was knowingly or recklessly false when made. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 14(a) – (b) of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition and that Arthur Andersen certified Enron's financial statements in 1998, 1999, and 2000, upon all of which Lehman reasonably relied.

15. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 15 of the Complaint.

16. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 16 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 16 of the Complaint.

17. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 17 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 17 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 17 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 17 of the Complaint.

18. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 18 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 18 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 18 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 18 of the Complaint.

19. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 19 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 19 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 19 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 19 of the Complaint.

20. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 20 of the Complaint.

21. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 21 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 21 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 21 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or

information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 21 of the Complaint.

22. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 22 of the Complaint.

23. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 23 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 23 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 23 of the Complaint insofar as they are intended to relate to Lehman, except that Lehman admits that LB 1 Group Inc. and certain officers of LBI invested in LJM2. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 23 of the Complaint.

24. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 24 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 24 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 24 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 24 of the Complaint.

25. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 25 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in

paragraph 25 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 25 of the Complaint insofar as they are intended to relate to Lehman, except that Lehman states that LB 1 Group Inc. received a copy of the “offering memorandum.” In addition, Lehman denies the characterization of the “offering memorandum” contained in paragraph 25 of the Complaint. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 25 of the Complaint.

26. Given the Court’s dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 26 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 26 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 26 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 26 of the Complaint.

27. Given the Court’s dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 27 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 27 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 27 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 27 of the Complaint.

28. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 28(a) – (d) of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 28(a) – (d) contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 28(a) – (d) of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 28(a) – (d) of the Complaint.

29. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 29 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 29 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 29 of the Complaint insofar as they are intended to relate to Lehman, except that Lehman admits that LB 1 Group Inc. and certain officers of LBI invested in LJM2 and that LBI issued research reports on Enron after said investments were made. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 29 of the Complaint.

30. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 30 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 30 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 30 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or

information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 30 of the Complaint.

31. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 31 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 31 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 31 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 31 of the Complaint.

32. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 32 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 32 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 32 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 32 of the Complaint.

33. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 33 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 33 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 33 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or

information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 33 of the Complaint.

34. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 34 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 34 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 34 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 34 of the Complaint.

35. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 35 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 35 of the Complaint.

36. To the extent the allegations set forth in paragraph 36 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 36 of the Complaint.

37. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 37 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 37 of the Complaint, except that

Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

38. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 38 of the Complaint.

39. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 39 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

40. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 40 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

41. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 41 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

42. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 42 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 42 of the Complaint.

43. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 43 of the Complaint.

44. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 44 of the Complaint.

45. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 45 of the Complaint.

46. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 46 of the Complaint.

47. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 47 of the Complaint.

48. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 48 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman states that LBI participated as an underwriter in connection with the following offerings identified in paragraph 48 of the Complaint:

- The August 1997 offering of \$150 million of 6.5% Notes due August 1, 2002;
- The July 7, 1998 offering of \$250 million of 6.4% Notes due July 15, 2006 and \$250 million of 6.95% Notes due July 15, 2028; and
- The May 1999 offering of \$500 million of 7.375% Notes due May 15, 2019.

Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 48 of the Complaint.

49. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 49 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such

allegations, except that Lehman states that LBI participated as an initial purchaser in connection with the following offerings identified in paragraph 49 of the Complaint:

- The August 17, 2000 offering of \$500 million of 8% Notes due 2005; and
- The September 28, 2000 offering of \$750 million of 7.797% Notes and € 315 million of 6.375% Notes due 2003 issued by Osprey Trust and Osprey I, Inc.

Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 49 of the Complaint.

50. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 50 of the Complaint.

51. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 51 of the Complaint.

52. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 52 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 52 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

53. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 53 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 53 contain legal conclusions, no response is required to those allegations. To the

extent a response is required, Lehman denies the allegations contained in paragraph 53 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 53 of the Complaint.

54. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 54 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. In addition, to the extent the allegations contained in paragraph 54 of the Complaint are intended to reflect public statements about Enron made by Lehman during the relevant time period, Lehman denies those allegations to the extent they are inconsistent with those public statements. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 54 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition, and that Arthur Andersen certified Enron's financial results upon all of which Lehman reasonably relied.

55. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 55 of the Complaint.

56. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 56 of the Complaint.

57. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 57 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 57 of the Complaint, except that

Lehman states that Skilling resigned and that Enron indicated it was for “personal reasons,” and that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

58. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 58 of the Complaint.

59. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 59 of the Complaint.

60. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 60 of the Complaint.

61. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 61 of the Complaint, except that Lehman admits upon information and belief that Enron restated its financial results for 1997 through 2000, that the Securities and Exchange Commission is engaged in an investigation related to Enron, and that Fastow resigned as Enron’s Chief Financial Officer.

62. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 62 of the Complaint.

63. Given the Court’s dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 63 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 63 of the Complaint, except that Lehman admits upon information and belief that Enron restated its financial results for 1997 through 2000.

64. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 64 of the Complaint.

65. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 65 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 65 of the Complaint.

66. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 66 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 66 of the Complaint, except that Lehman admits that Dynegy did not acquire Enron, that Enron filed for protection under Chapter 11 of the Bankruptcy Code, and that Enron's publicly-traded securities suffered price declines.

67. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 67 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 67 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 67 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 67 of the Complaint.

68. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 68 of the Complaint, except that Lehman admits that Congress is investigating Enron's collapse.

69. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 69 of the Complaint.

70. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 70(a) – (c) of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent that the allegations in paragraph 70(a) – (c) contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 70(a) – (c) of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 70(a) – (c) of the Complaint, except that Lehman admits that Arthur Andersen certified Enron's financial results upon which Lehman reasonably relied.

71. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 71 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 71 of the Complaint.

72. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 72 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 72 of the Complaint.

73. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 73 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 73 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 73 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 73 of the Complaint.

74. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 74 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 74 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 74 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 74 of the Complaint.

75. The allegations set forth in paragraph 75 contain legal conclusions, to which no response is required. To the extent a response is required, Lehman admits that the Complaint purports to assert claims under Sections 10(b), 20(a) and 20A of the Securities Exchange Act of 1934, 15 U.S.C. §§ 78j(b), 78t(a), and 78t-1, under Sections 11 and 15 of the Securities Act of 1933, 15 U.S.C. §§ 77k, and 77o, and under Texas Rev. Civ. Stat., art. 581-33, but denies any and all liability under those statutes.

76. The allegations set forth in paragraph 76 contain legal conclusions to which no response is required. To the extent a response is required, Lehman does not contest the Court's jurisdiction over the subject matter of this action.

77. The allegations set forth in paragraph 77 contain legal conclusions to which no response is required. To the extent a response is required, Lehman does not contest that venue is proper in the Southern District of Texas.

78. To the extent the allegations set forth in paragraph 78 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 78 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 78 of the Complaint.

79. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 79 of the Complaint.

80. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 80 of the Complaint.

81. Lehman denies that it is liable for any damages that may have been suffered by any of the plaintiffs identified in the allegations contained in paragraph 81(a) – (e), 81(g), 81(i) – (l), and 81(n) – (q) of the Complaint. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 81(a) – (e), 81(g), 81(i) – (l), and 81(n) – (q) of the Complaint. No response is required to paragraphs 81(f), 81(h), or 81(m) because plaintiffs have deleted those paragraphs of the Complaint.

82. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 82 of the Complaint, except that Lehman admits that Enron is not named as a defendant in this action.

83. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 83(a) – (d), 83(f) – (n), and 83(p) – (jj) of the Complaint, except that Lehman states upon information and belief that the officers and directors of Enron were a matter of public record and that, for at least some time during the relevant time period, Kenneth L. Lay was Chairman of the Board of Directors of Enron and Chief Executive Officer of Enron, Jeffrey K. Skilling was Enron's President and Chief Operating Officer, and Andrew S. Fastow was Enron's Chief Financial Officer. No response is required to paragraphs 83(e) or 83(o) because plaintiffs have deleted those paragraphs of the Complaint.

84. To the extent the allegations set forth in paragraph 84 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 84 of the Complaint.

85. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 85(a) – (c) of the Complaint.

86. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 86 of the Complaint.

87. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 87 of the Complaint.

88. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 88 of the Complaint.

89. To the extent the allegations set forth in paragraph 89 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 89 of the Complaint.

90. To the extent the allegations set forth in paragraph 90 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 90 of the Complaint.

91. No response is required to the allegations contained in paragraph 91 of the Complaint.

92. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 92(a) – (g) of the Complaint, except that Lehman admits that Arthur Andersen certified Enron’s financial results upon which Lehman reasonably relied.

93. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 93(a) – (d), 93(g) – (o), and 93(q) of the Complaint, except that Lehman admits that Arthur Andersen certified Enron’s financial results upon which Lehman reasonably relied. No response is required to paragraphs 93(e), 93(f), 93(p), or 93(r) – (w) because plaintiffs have deleted those paragraphs of the Complaint.

94. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 94 of the Complaint, except that Lehman admits that Arthur Andersen certified Enron’s financial results upon which Lehman reasonably relied.

95. No response is required to the allegations contained in paragraph 95 of the Complaint.

96. To the extent the allegations set forth in paragraph 96 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman admits that Berardino, Randall, McAlindon and Andrews are named as defendants in the Complaint.

97. To the extent the allegations set forth in paragraph 97 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman reasserts and repeats its responses to the allegations contained in paragraphs 897 through 982 of the Complaint.

98. To the extent the allegations set forth in paragraph 98 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 98 of the Complaint.

99. No response is required to the allegations contained in paragraph 99 because plaintiffs have deleted that paragraph of the Complaint.

99.1 To the extent the allegations set forth in paragraph 99.1 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 99.1 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 99.1 of the Complaint.

100. To the extent the allegations set forth in paragraph 100(a) – (c) contain legal conclusions, no response is required to those allegations. To the extent a response is

required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 100(a) – (c) of the Complaint.

101. To the extent the allegations set forth in paragraph 101(a) – (d) contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 101(a) – (d) of the Complaint.

102. To the extent the allegations set forth in paragraph 102(a) – (c) contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 102(a) – (c) of the Complaint.

103. To the extent the allegations set forth in paragraph 103(a) – (d) contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 103(a) – (d) of the Complaint.

104. To the extent the allegations set forth in paragraph 104(a) – (b) contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 104(a) – (b) of the Complaint.

105. To the extent the allegations set forth in paragraph 105(a) – (b) contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 105(a) – (b) of the Complaint.

106. To the extent the allegations set forth in paragraph 106(a) – (c) contain legal conclusions, no response is required to those allegations. To the extent a response is

required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 106(a) – (c) of the Complaint.

107. To the extent the allegations set forth in paragraph 107(a) – (d) contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 107(a) – (d) of the Complaint.

108. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 108 of the Complaint. In addition, to the extent the allegations set forth in paragraph 108 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 108 of the Complaint, except that Lehman admits that LBHI is a holding company with subsidiaries that provide financial services, including capital raising for clients through securities underwriting and direct placements; corporate finance and strategic advisory services; private equity investments; securities sales and trading; research; and the trading of foreign exchange and derivative products and certain commodities.

109. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 109 of the Complaint.

110. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 110 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman states that LBI participated as an underwriter in connection with an offering of Enron securities in May 1998. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 110 of the Complaint.

111. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 111 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman states that LBI participated as an underwriter in connection with the July 7, 1998 offering of \$250 million of 6.4% Notes due July 15, 2006 and \$250 million of 6.95% Notes due July 15, 2028. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 111 of the Complaint.

112. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 112 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

113. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 113 of the Complaint.

114. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 114 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

115. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 115 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

116. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 116 of the Complaint.

117. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 117 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

118. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 118 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

119. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 119 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

120. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 120 of the Complaint.

121. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 121(a) –(k) of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman reasserts and repeats its responses to the allegations contained in paragraphs 418 through 661 of the Complaint for its response to the allegations contained in paragraph 121(a) – (k). In addition, Lehman denies the allegations contained in paragraph 121(a) – (k) of the Complaint, insofar as they are intended to suggest in any way that Lehman made a knowingly or recklessly false or misleading statement about Enron. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 121(a) – (k) of

the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

122. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 122 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

123. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 123 of the Complaint.

124. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 124 of the Complaint.

125. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 125 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman states that LBI issued a research report on Enron on or about December 9, 1998 from which plaintiffs inaccurately quote in paragraph 125 of the Complaint. Lehman denies all allegations contained in paragraph 125 of the Complaint to the extent they are intended to suggest in any way that any of the statements contained in that research report were knowingly or recklessly false when made.

126. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 126 of the Complaint.

127. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 127 of the Complaint.

128. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 128 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

129. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 129 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

130. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 130 of the Complaint.

131. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 131 of the Complaint.

132. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 132 of the Complaint.

133. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 133 of the Complaint.

134. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 134 of the Complaint.

135. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 135 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman states that LBI participated as an underwriter in connection with a February 1999 offering of shares of Enron common stock. Lehman is without knowledge or

information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 135 of the Complaint.

136. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 136 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

137. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 137 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

138. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 138 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

139. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 139 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

140. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 140 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition and that Arthur Andersen certified Enron's 1997 and 1998 financial results upon all of which Lehman reasonably relied.

141. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 141 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition and that Arthur Andersen certified Enron's 1997 and 1998 financial results upon all of which Lehman reasonably relied.

142. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 142 of the Complaint.

143. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 143 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman states that LBI issued a research report on Enron on or about April 7, 1999 from which plaintiffs inaccurately quote in paragraph 143 of the Complaint. Lehman denies all allegations contained in paragraph 143 of the Complaint to the extent they are intended to suggest in any way that any of the statements contained in that research report were knowingly or recklessly false when made.

144. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 144 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

145. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 145 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

146. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 146 of the Complaint.

147. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 147 of the Complaint.

148. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 148 of the Complaint.

149. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 149 of the Complaint.

150. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 150 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman states that LBI issued a research report on Enron on or about May 7, 1999 from which plaintiffs inaccurately quote in paragraph 150 of the Complaint. Lehman denies all allegations contained in paragraph 150 of the Complaint to the extent they are intended to suggest in any way that any of the statements contained in that research report were knowingly or recklessly false when made.

151. Lehman denies the allegations contained in paragraph 151 of the Complaint insofar as they are intended to relate to Lehman, except that Lehman admits that LBI participated as an underwriter in connection with a May 1999 offering of \$500 million of 7.375% Notes. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 151 of the Complaint.

152. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 152 of the Complaint.

153. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 153 of the Complaint.

154. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 154 of the Complaint.

155. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 155(a) – (p) of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman reasserts and repeats its responses to the allegations contained in paragraphs 418 through 661 of the Complaint for its response to the allegations contained in paragraph 155. In addition, Lehman denies the allegations contained in paragraph 155(a) – (p) of the Complaint, insofar as they are intended to suggest in any way that Lehman made a knowingly or recklessly false or misleading statement about Enron. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 155(a) – (p) of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

156. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 156 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

157. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 157 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period,

Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

158. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 158 of the Complaint.

159. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 159 of the Complaint.

160. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 160 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

161. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 161 of the Complaint.

162. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 162 of the Complaint.

163. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 163 of the Complaint.

164. Lehman reasserts and repeats its responses to the allegations contained in paragraphs 418 through 611 of the Complaint for its response to the allegations contained in paragraph 164. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 164 of the Complaint.

165. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 165 of the Complaint.

166. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 166 of the Complaint.

167. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 167 of the Complaint.

168. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 168 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

169. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 169 of the Complaint.

170. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 170 of the Complaint. To the extent a response is required, Lehman denies such allegations.

171. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 171 of the Complaint.

172. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 172 of the Complaint.

173. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 173 of the Complaint.

174. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 174 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

175. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 175 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required to such allegations,

Lehman admits that plaintiffs have accurately quoted from the article to the extent it purports to recount statements made by Ted Izatt. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 175 of the Complaint.

176. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 176 of the Complaint.

177. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 177 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

178. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 178 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

179. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 179 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

180. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 180 of the Complaint.

181. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 181 of the Complaint.

182. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 182 of the Complaint.

183. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 183 of the Complaint.

184. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 184 of the Complaint.

185. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 185 of the Complaint.

186. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 186 of the Complaint.

187. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 187 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

188. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 188 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations to the extent they are intended to suggest that Lehman made a knowingly false or misleading statement about Enron. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 188 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

189. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 189 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 189 of the Complaint.

190. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 190 of the Complaint.

191. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 191 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

192. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 192 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

193. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 193 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

194. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 194 of the Complaint.

195. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 195 of the Complaint.

196. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 196 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

197. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 197 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

198. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 198 of the Complaint.

199. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 199 of the Complaint.

200. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 200 of the Complaint.

201. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 201 of the Complaint.

202. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 202 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

203. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 203 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period,

Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

204. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 204 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

205. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 205 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

206. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 206 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman states that LBI issued a research report on Enron on or about January 21, 2000 from which plaintiffs selectively quote in paragraph 206 of the Complaint. Lehman denies all allegations contained in paragraph 206 of the Complaint to the extent they are intended to suggest in any way that any of the statements contained in that research report were knowingly or recklessly false when made.

207. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 207 of the Complaint.

208. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 208 of the Complaint, except that Lehman

admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

209. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 209 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

210. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 210 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

211. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 211 of the Complaint.

212. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 212 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

213. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 213 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

214. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 214(a) – (r) of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman reasserts and repeats its responses to the allegations contained in paragraphs 418 through 611 of the Complaint for its response to the allegations contained in paragraph 214. In addition, Lehman denies the allegations contained in paragraph 214(a) – (r) of the Complaint, insofar as they are intended to suggest in any way that Lehman made a knowingly or recklessly false or misleading statement about Enron. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 214(a) – (r) of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

215. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 215 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

216. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 216 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

217. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 217 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

218. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 218 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

219. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 219 of the Complaint, except that Lehman admits that Arthur Andersen certified Enron's 1999 financial results upon which Lehman reasonably relied.

220. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 220 of the Complaint.

221. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 221 of the Complaint, except that Lehman admits that Arthur Andersen certified Enron's 1998 and 1999 financial results upon which Lehman reasonably relied.

222. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 222 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

223. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 223 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

224. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 224 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

225. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 225 of the Complaint.

226. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 226 of the Complaint.

227. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 227 of the Complaint.

228. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 228 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

229. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 229 of the Complaint.

230. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 230 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

231. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 231 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such

allegations, except that Lehman states that LBI issued a research report on Enron on or about April 13, 2000 from which plaintiffs selectively quote in paragraph 231 of the Complaint.

Lehman denies all allegations contained in paragraph 231 of the Complaint to the extent they are intended to suggest in any way that any of the statements contained in that research report were knowingly or recklessly false when made.

232. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 232 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

233. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 233 of the Complaint.

234. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 234 of the Complaint.

235. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 235 of the Complaint.

236. Lehman denies the allegations contained in paragraph 236 of the Complaint insofar as they are intended to relate to Lehman, except that Lehman states that LBI participated as an underwriter in connection with the June 1, 2000 offering of \$325 million in 7.875% Notes due June 15, 2003. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 236 of the Complaint.

237. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 237 of the Complaint.

238. Lehman denies the allegations contained in paragraph 238 of the Complaint, except that Lehman states that LBI participated as an underwriter in connection with a June 1, 2000 offering of 7.875% Notes due June 15, 2003.

239. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 239 of the Complaint.

240. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 240 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

241. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 241 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

242. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 242 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

243. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 243 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

244. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 244 of the Complaint, except that Lehman

states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

245. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 245 of the Complaint.

246. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 246 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

247. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 247 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

248. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 248 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

249. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 249 of the Complaint.

250. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 250 of the Complaint.

251. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 251 of the Complaint.

252. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 252 of the Complaint.

253. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 253 of the Complaint.

254. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 254 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman states that LBI issued a research report on Enron on or about July 25, 2000 from which plaintiffs selectively quote in paragraph 254 of the Complaint. Lehman denies all allegations contained in paragraph 254 of the Complaint to the extent they are intended to suggest in any way that any of the statements contained in that research report were knowingly or recklessly false when made.

255. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 255 of the Complaint.

256. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 256 of the Complaint.

257. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 257 of the Complaint.

258. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 258 of the Complaint.

259. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 259 of the Complaint.

260. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 260 of the Complaint.

261. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 261 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

262. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 262 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

263. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 263 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

264. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 264 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

265. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 265 of the Complaint.

266. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 266 of the Complaint.

267. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 267 of the Complaint.

268. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 268 of the Complaint.

269. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 269 of the Complaint.

270. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 270 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman states that LBI issued a research report on Enron on or about October 19, 2000 from which plaintiffs selectively quote in paragraph 270 of the Complaint. Lehman denies all allegations contained in paragraph 270 of the Complaint to the extent they are intended to suggest in any way that any of the statements contained in that research report were knowingly or recklessly false when made.

271. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 271 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 271 of the Complaint.

272. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 272 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

273. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 273 of the Complaint.

274. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 274 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

275. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 275 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

276. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 276 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

277. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 277 of the Complaint.

278. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 278 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 278 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 278 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 278 of the Complaint.

279. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 279 of the Complaint.

280. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 280 of the Complaint.

281. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 281 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

282. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 282 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

283. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 283 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

284. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 284 of the Complaint.

285. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 285 of the Complaint.

286. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 286 of the Complaint.

287. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 287 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such

allegations, except that Lehman states that LBI issued a research report on Enron on or about February 1, 2001 from which plaintiffs selectively quote in paragraph 287 of the Complaint. Lehman denies all allegations contained in paragraph 287 of the Complaint to the extent they are intended to suggest in any way that any of the statements contained in that research report were knowingly or recklessly false when made.

288. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 288 of the Complaint.

289. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 289 of the Complaint.

290. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 290 of the Complaint.

291. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 291 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

292. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 292 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 292 of the Complaint, except that Lehman admits that Arthur Andersen certified Enron's 1999 and 2000 financial results upon which Lehman reasonably relied.

293. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 293 of the Complaint, except that Lehman

states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

294. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 294 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

295. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 295 of the Complaint.

296. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 296 of the Complaint.

297. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 297 of the Complaint.

298. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 298 of the Complaint.

299. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 299 of the Complaint.

300. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 300(a) – (s) of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman reasserts and repeats its responses to the allegations contained in paragraphs 418 through 661 of the Complaint for its response to the allegations contained in paragraph 300. In addition, Lehman denies the allegations contained in paragraph 300(a) – (s) of the Complaint, insofar as they are intended to suggest in any way that Lehman made a knowingly or recklessly false or misleading statement about Enron. Lehman is without knowledge or information sufficient to

form a belief as to the truth of the remaining allegations contained in paragraph 300(a) – (s) of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

301. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 301 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 301 of the Complaint.

302. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 302 of the Complaint.

303. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 303 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman states that LBI issued a research report on Enron on or about March 12, 2001 from which plaintiffs selectively quote in paragraph 303 of the Complaint. Lehman denies all allegations contained in paragraph 303 of the Complaint to the extent they are intended to suggest in any way that any of the statements contained in that research report were knowingly or recklessly false when made.

304. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 304 of the Complaint.

305. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 305 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such

allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 305 of the Complaint.

306. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 306 of the Complaint.

307. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 307 of the Complaint.

308. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 308 of the Complaint.

309. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 309 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

310. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 310 of the Complaint.

311. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 311 of the Complaint.

312. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 312 of the Complaint. To the extent a response is required, Lehman denies such allegations.

313. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 313 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such

allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 313 of the Complaint.

314. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 314 of the Complaint to the extent they are intended to suggest that Lehman made a knowingly or recklessly false or misleading statement about Enron. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 314 of the Complaint.

315. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 315 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

316. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 316 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

317. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 317 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

318. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 318 of the Complaint, except that Lehman

states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

319. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 319 of the Complaint.

320. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 320 of the Complaint.

321. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 321 of the Complaint.

322. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 322 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman states that LBI issued a research report on Enron on or about April 18, 2001 from which plaintiffs selectively quote in paragraph 322 of the Complaint. Lehman denies all allegations contained in paragraph 322 of the Complaint to the extent they are intended to suggest in any way that any of the statements contained in that research report were knowingly or recklessly false when made.

323. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 323 of the Complaint.

324. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 324 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations to the extent they are inconsistent with public statements about Enron made by Lehman during the relevant time period. Lehman further denies that it "rushed to support

Enron's stock price." Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 324 of the Complaint.

325. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 325 of the Complaint.

326. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 326 of the Complaint.

327. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 327 of the Complaint.

328. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 328 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

329. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 329 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

330. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 330 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

331. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 331 of the Complaint, except that Lehman

states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

332. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 332 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

333. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 333 of the Complaint.

334. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 334 of the Complaint.

335. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 335 of the Complaint.

336. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 336 of the Complaint.

337. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 337 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

338. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 338 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman states that LBI issued a research report on Enron on or about July 26, 2001 from which plaintiffs selectively quote in paragraph 338 of the Complaint.

Lehman denies all allegations contained in paragraph 338 of the Complaint to the extent they are

intended to suggest in any way that any of the statements contained in that research report were knowingly or recklessly false when made.

339. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 339(a) – (s) of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman reasserts and repeats its responses to the allegations contained in paragraphs 418 through 661 of the Complaint for its response to the allegations contained in paragraph 339. In addition, Lehman denies the allegations contained in paragraph 339(a) – (s) of the Complaint, insofar as they are intended to suggest in any way that Lehman made a knowingly or recklessly false or misleading statement about Enron. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 339(a) – (s) of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

340. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 340 of the Complaint.

341. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 341 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman states that LBI issued a research report on Enron on or about August 14, 2001 from which plaintiffs inaccurately quote in paragraph 341 of the Complaint. Lehman denies all allegations contained in paragraph 341 of the Complaint to the extent they are intended to suggest in any way that any of the statements contained in that research report were knowingly or recklessly false when made.

342. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 342 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 342 of the Complaint.

343. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 343 of the Complaint, except that Lehman admits that Enron announced that Skilling was resigning for personal reasons only, and that Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

344. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 344 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

345. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 345 of the Complaint.

346. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 346 of the Complaint.

347. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 347 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman states that LBI issued a research report on Enron on or about August 15, 2001 from which plaintiffs selectively quote in paragraph 347 of the Complaint.

Lehman denies all allegations contained in paragraph 347 of the Complaint to the extent they are intended to suggest in any way that any of the statements contained in that research report were knowingly or recklessly false when made.

348. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 348 of the Complaint.

349. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 349 of the Complaint.

350. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 350 of the Complaint to the extent they are intended to suggest that Lehman made a knowingly false or misleading statement about Enron. To the extent a response is required, Lehman denies the allegations contained in paragraph 350 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 350 of the Complaint.

351. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 351 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman states that one or more representatives of LBI met with one or more representatives of Enron on August 16, 2001. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 351 of the Complaint.

352. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 352 of the Complaint.

353. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 353 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman states that LBI issued a research report on Enron on or about August 17, 2001 from which plaintiffs selectively quote in paragraph 353 of the Complaint. Lehman denies all allegations contained in paragraph 353 of the Complaint to the extent they are intended to suggest in any way that any of the statements contained in that research report were knowingly or recklessly false when made.

354. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 354 of the Complaint.

355. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 355 of the Complaint.

356. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 356 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

357. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 357 of the Complaint.

358. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 358 of the Complaint.

359. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 359 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such

allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 359 of the Complaint.

360. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 360 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 360 of the Complaint.

361. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 361 of the Complaint.

362. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 362 of the Complaint.

363. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 363 of the Complaint.

364. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 364 of the Complaint, except that Enron announced a charge.

365. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 365 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 365 of the Complaint.

366. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 366 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period,

Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

367. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 367 of the Complaint.

368. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 368 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

369. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 369 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

370. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 370 of the Complaint.

371. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 371 of the Complaint.

372. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 372 of the Complaint.

373. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 373 of the Complaint.

374. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 374 of the Complaint.

375. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 375 of the Complaint.

376. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 376 of the Complaint.

377. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 377 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

378. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 378 of the Complaint.

379. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 379 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman states that LBI issued a research report on Enron on or about October 23, 2001 from which plaintiffs selectively quote in paragraph 379 of the Complaint. Lehman denies all allegations contained in paragraph 379 of the Complaint to the extent they are intended to suggest in any way that any of the statements contained in that research report were knowingly or recklessly false when made.

380. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 380 of the Complaint.

381. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 381 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman states that LBI issued a research report on Enron on or about October 24, 2001 from which plaintiffs selectively quote in paragraph 381 of the Complaint.

Lehman denies all allegations contained in paragraph 381 of the Complaint to the extent they are intended to suggest in any way that any of the statements contained in that research report were knowingly or recklessly false when made.

382. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 382 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

383. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 383 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

384. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 384 of the Complaint, except that Lehman admits that upon information and belief Enron restated its financial results for 1997 through 2000.

385. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 385 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 385 of the Complaint.

386. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 386 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such

allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 386 of the Complaint.

387. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 387 of the Complaint.

388. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 388 of the Complaint, except that Lehman admits that, in conference calls held for analysts and investors during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

389. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 389 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 389 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 389 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 389 of the Complaint.

390. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 390 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 390 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 390 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or

information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 390 of the Complaint.

391. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 391 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 391 of the Complaint, except that Lehman admits that Dynegy did not acquire Enron, that Enron filed for protection under Chapter 11 of the Bankruptcy Code, and that Enron's publicly-traded securities suffered price declines.

392. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 392 of the Complaint, except that Lehman admits that Congress is investigating Enron's collapse.

393. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 393 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 393 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 393 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 393 of the Complaint.

394. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 394 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 394 contain legal conclusions, no response is required to those allegations. To the

extent a response is required, Lehman denies the allegations contained in paragraph 394 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 394 of the Complaint.

395. To the extent the allegations set forth in paragraph 395 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 395 of the Complaint.

396. To the extent the allegations set forth in paragraph 396 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 396 of the Complaint.

397. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 397 of the Complaint.

398. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 398 of the Complaint.

399. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 399 of the Complaint.

400. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 400 of the Complaint.

401. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 401 of the Complaint.

402. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 402 of the Complaint.

403. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 403 of the Complaint.

404. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 404 of the Complaint.

405. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 405 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 405 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 405 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 405 of the Complaint.

406. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 406 of the Complaint.

407. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 407 of the Complaint.

408. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 408 of the Complaint.

409. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 409 of the Complaint.

410. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 410 of the Complaint.

411. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 411 of the Complaint.

412. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 412 of the Complaint.

413. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 413 of the Complaint.

414. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 414 of the Complaint.

415. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 415 of the Complaint.

416. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 416 of the Complaint.

417. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 417 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 417 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 417 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 417 of the Complaint.

418. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 418(a) – (j) of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 418(a) – (j) contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 418(a) – (j) of the Complaint insofar as they are intended to relate to Lehman. Lehman is without

knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 418(a) – (j) of the Complaint.

419. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 419 of the Complaint, except that Lehman admits upon information and belief that Enron restated its financial results for 1997 through 2000.

420. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 420 of the Complaint.

421. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 421 of the Complaint.

422. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 422 of the Complaint.

423. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 423 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 423 of the Complaint.

424. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 424 of the Complaint, except that Lehman states that Enron reported positive financial results during the relevant time period upon which Lehman reasonably relied.

425. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 425 of the Complaint, except that Lehman admits that Enron included its financial results in various press releases and SEC filings.

426. To the extent the allegations set forth in paragraph 426 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 426 of the Complaint.

427. To the extent the allegations set forth in paragraph 427 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 427 of the Complaint, except that Lehman admits upon information and belief the allegations contained in the first sentence of paragraph 427 of the Complaint.

428. To the extent the allegations set forth in paragraph 428 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 428 of the Complaint.

429. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 429 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 429 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 429 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 429 of the Complaint.

430. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 430 of the Complaint.

431. To the extent the allegations set forth in paragraph 431 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 431 of the Complaint.

432. To the extent the allegations set forth in paragraph 432 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 432 of the Complaint.

433. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 433 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 433 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 433 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 433 of the Complaint.

434. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 434 of the Complaint.

435. To the extent the allegations set forth in paragraph 435 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 435 of the Complaint.

436. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 436 of the Complaint.

437. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 437 of the Complaint.

438. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 438 of the Complaint.

439. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 439 of the Complaint.

440. To the extent the allegations set forth in paragraph 440 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 440 of the Complaint.

441. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 441 of the Complaint.

442. To the extent the allegations set forth in paragraph 442 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 442 of the Complaint.

443. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 443 of the Complaint.

444. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 444 of the Complaint.

445. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 445 of the Complaint.

446. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 446 of the Complaint.

447. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 447 of the Complaint.

448. To the extent the allegations set forth in paragraph 448 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 448 of the Complaint.

449. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 449 of the Complaint.

450. To the extent the allegations set forth in paragraph 450 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 450 of the Complaint.

451. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 451 of the Complaint.

452. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 452 of the Complaint.

453. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 453 of the Complaint.

454. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 454 of the Complaint.

455. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 455 of the Complaint.

456. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 456 of the Complaint.

457. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 457 of the Complaint.

458. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 458 of the Complaint.

459. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 459 of the Complaint.

460. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 460 of the Complaint, except that Lehman admits upon information and belief that LJM2 was created in 1999.

461. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 461 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman admits that LB 1 Group Inc. and certain officers of LBI invested in LJM2. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 461 of the Complaint.

462. To the extent the allegations set forth in paragraph 462 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 462 of the Complaint.

463. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 463 of the Complaint.

464. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 464 of the Complaint.

465. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 465 of the Complaint.

466. To the extent the allegations set forth in paragraph 466 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 466 of the Complaint.

467. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 467 of the Complaint.

468. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 468 of the Complaint.

469. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 469 of the Complaint.

470. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 470 of the Complaint.

471. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 471 of the Complaint.

472. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 472 of the Complaint.

473. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 473 of the Complaint.

474. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 474 of the Complaint.

475. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 475 of the Complaint.

476. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 476 of the Complaint.

477. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 477 of the Complaint.

478. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 478 of the Complaint.

479. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 479 of the Complaint.

480. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 480 of the Complaint.

481. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 481 of the Complaint.

482. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 482 of the Complaint.

483. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 483 of the Complaint.

484. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 484 of the Complaint.

485. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 485 of the Complaint.

486. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 486 of the Complaint.

487. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 487 of the Complaint.

488. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 488 of the Complaint.

489. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 489 of the Complaint.

490. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 490 of the Complaint.

491. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 491 of the Complaint.

492. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 492 of the Complaint.

493. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 493 of the Complaint.

494. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 494 of the Complaint.

495. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 495 of the Complaint.

496. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 496(a) – (b) of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 496(a) – (b) contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 496(a) – (b) of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 496(a) – (b) of the Complaint.

497. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 497 of the Complaint.

498. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 498 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 498 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 498 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 498 of the Complaint.

499. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 499 of the Complaint.

500. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 500 of the Complaint.

501. To the extent the allegations set forth in paragraph 501 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 501 of the Complaint.

502. To the extent the allegations set forth in paragraph 502 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 502 of the Complaint.

503. To the extent the allegations set forth in paragraph 503 contain legal conclusions, no response is required to those allegations. To the extent a response is required,

Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 503 of the Complaint.

504. To the extent the allegations set forth in paragraph 504 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 504 of the Complaint.

505. To the extent the allegations set forth in paragraph 505 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 505 of the Complaint.

506. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 506 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 506 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 506 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 506 of the Complaint.

507. To the extent the allegations set forth in paragraph 507 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 507 of the Complaint.

508. To the extent the allegations set forth in paragraph 508 contain legal conclusions, no response is required to those allegations. To the extent a response is required,

Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 508 of the Complaint.

509. To the extent the allegations set forth in paragraph 509 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 509 of the Complaint.

510. To the extent the allegations set forth in paragraph 510 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 510 of the Complaint.

511. To the extent the allegations set forth in paragraph 511 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 511 of the Complaint.

512. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 512 of the Complaint.

513. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 513 of the Complaint.

514. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 514 of the Complaint.

515. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 515 of the Complaint.

516. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 516 of the Complaint to the extent

they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 516 of the Complaint.

517. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 517 of the Complaint.

518. To the extent the allegations set forth in paragraph 518 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 518 of the Complaint.

519. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 519 of the Complaint.

520. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 520 of the Complaint.

521. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 521 of the Complaint.

522. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 522 of the Complaint.

523. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 523 of the Complaint.

524. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 524 of the Complaint.

525. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 525 of the Complaint.

526. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 526 of the Complaint.

527. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 527 of the Complaint.

528. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 528 of the Complaint.

529. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 529 of the Complaint.

530. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 530 of the Complaint.

531. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 531 of the Complaint.

532. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 532 of the Complaint.

533. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 533 of the Complaint.

534. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 534 of the Complaint.

535. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 535 of the Complaint.

536. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 536 of the Complaint.

537. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 537 of the Complaint.

538. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 538 of the Complaint.

539. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 539 of the Complaint.

540. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 540 of the Complaint.

541. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 541 of the Complaint.

542. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 542 of the Complaint.

543. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 543 of the Complaint.

544. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 544 of the Complaint.

545. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 545 of the Complaint.

546. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 546 of the Complaint.

547. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 547 of the Complaint.

548. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 548 of the Complaint.

549. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 549 of the Complaint.

550. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 550 of the Complaint.

551. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 551 of the Complaint.

552. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 552 of the Complaint.

553. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 553 of the Complaint.

554. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 554 of the Complaint.

555. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 555 of the Complaint.

556. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 556 of the Complaint.

557. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 557 of the Complaint.

558. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 558 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 558 of the Complaint.

559. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 559 of the Complaint.

560. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 560 of the Complaint.

561. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 561 of the Complaint.

562. To the extent the allegations set forth in paragraph 562 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 562 of the Complaint.

563. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 563 of the Complaint.

564. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 564 of the Complaint.

565. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 565 of the Complaint.

566. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 566 of the Complaint.

567. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 567 of the Complaint.

568. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 568 of the Complaint.

569. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 569 of the Complaint.

570. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 570 of the Complaint.

571. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 571 of the Complaint.

572. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 572 of the Complaint.

573. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 573 of the Complaint.

574. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 574 of the Complaint.

575. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 575 of the Complaint.

576. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 576 of the Complaint.

577. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 577 of the Complaint.

578. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 578 of the Complaint.

579. To the extent the allegations set forth in paragraph 579 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 579 of the Complaint.

580. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 580 of the Complaint.

581. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 581 of the Complaint.

582. To the extent the allegations set forth in paragraph 582 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 582 of the Complaint.

583. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 583 of the Complaint.

584. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 584 of the Complaint.

585. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 585 of the Complaint.

586. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 586 of the Complaint.

587. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 587 of the Complaint.

588. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 588 of the Complaint, except that Lehman admits that Enron announced a write-off.

589. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 589 of the Complaint.

590. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 590 of the Complaint.

591. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 591 of the Complaint.

592. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 592 of the Complaint.

593. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 593 of the Complaint.

594. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 594 of the Complaint.

595. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 595 of the Complaint.

596. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 596 of the Complaint.

597. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 597 of the Complaint.

598. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 598 of the Complaint.

599. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 599 of the Complaint.

600. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 600 of the Complaint.

601. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 601 of the Complaint.

602. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 602 of the Complaint.

603. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 603 of the Complaint.

604. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 604 of the Complaint.

605. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 605 of the Complaint.

606. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 606 of the Complaint.

607. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 607 of the Complaint.

608. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 608 of the Complaint.

609. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 609 of the Complaint.

610. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 610(a) – (h) of the Complaint.

611. To the extent the allegations set forth in paragraph 611 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 611 of the Complaint.

612. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 612 of the Complaint, except that Lehman admits that LBI participated as an underwriter in connection with a July 1998 Notes offering, a February 1999 Enron common stock offering, and a May 1999 Notes offering, and that Enron's registration statements in connection with those offerings incorporated by reference certain of Enron's SEC reports.

613. To the extent the allegations set forth in paragraph 613 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 613 of the Complaint, except that Lehman admits that Enron's offering documents in connection with the offerings identified in Lehman's response to the allegations contained in paragraph 612 of the Complaint incorporated by reference certain of Enron's SEC reports and that Enron restated its financial results for 1997 through 2000.

614. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 614 of the Complaint.

615. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 615 of the Complaint.

616. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 616 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 616 of the Complaint.

617. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 617 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 617 of the Complaint.

618. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 618 of the Complaint.

619. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 619 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 619 of the Complaint.

620. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 620 of the Complaint.

621. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 621 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 621 of the Complaint.

622. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 622 of the Complaint.

623. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 623 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

624. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 624 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 624 of the Complaint.

625. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 625 of the Complaint.

626. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 626 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 626 of the Complaint.

627. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 627 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman admits that LB 1 Group Inc. and certain officers of LBI invested in LJM2. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 627 of the Complaint.

628. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 628 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 628 of the Complaint.

629. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 629 of the Complaint.

630. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 630 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such

allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 630 of the Complaint.

631. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 631 of the Complaint.

632. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 632 of the Complaint.

633. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 633 of the Complaint.

634. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 634 of the Complaint.

635. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 635 of the Complaint.

636. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 636 of the Complaint.

637. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 637 of the Complaint.

638. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 638 of the Complaint.

639. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 639 of the Complaint.

640. To the extent the allegations set forth in paragraph 640 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 640 of the Complaint.

641. To the extent the allegations set forth in paragraph 641 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641 of the Complaint.

641.1. To the extent the allegations set forth in paragraph 641.1 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 641.1 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 641.1 of the Complaint.

641.2. Lehman denies the allegations contained in paragraph 641.2 of the Complaint insofar as they are intended to relate to Lehman, except that Lehman states that LBI participated as an underwriter or initial purchaser in connection with the following offerings identified in paragraph 641.2 of the Complaint:

- The August 17, 2000 offering of \$500 million of 8% Notes due 2005; and
- The September 28, 2000 offering of \$750 million of 7.797% Notes and € 315 million of 6.375% Notes due 2003 issued by Osprey Trust and Osprey I, Inc.

Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 641.2 of the Complaint.

641.3. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.3 of the Complaint.

641.4. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.4 of the Complaint.

641.5. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.5 of the Complaint.

641.6. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.6 of the Complaint.

641.7. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.7 of the Complaint.

641.8. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.8 of the Complaint.

641.9. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.9 of the Complaint.

641.10. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.10 of the Complaint.

641.11. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.11 of the Complaint.

641.12. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.12 of the Complaint.

641.13. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.13 of the Complaint.

641.14. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.14 of the Complaint.

641.15. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.15 of the Complaint.

641.16. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.16 of the Complaint.

641.17. Lehman denies the allegations contained in paragraph 641.17 of the Complaint insofar as they are intended to relate to Lehman, except that Lehman states that LBI participated as an initial purchaser in connection with the the August 17, 2000 offering of \$500 million of 8% Notes due 2005 and upon information and belief that Salomon Smith Barney and Deutsche Banc Alex. Brown also participated as initial purchasers. Lehman further states upon information and belief that these Notes were publicly traded on the Luxembourg stock exchange. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 641.17 of the Complaint.

641.18. Lehman denies the allegations contained in paragraph 641.18 of the Complaint insofar as they are intended to relate to Lehman, except that Lehman states that LBI participated as an initial purchaser in connection with the the August 17, 2000 offering of \$500 million of 8% Notes due 2005 and upon information and belief that Salomon Smith Barney and Deutsche Banc Alex. Brown also participated as initial purchasers. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 641.18 of the Complaint.

641.19. Lehman states that the Offering Memorandum for the August 17, 2000 offering incorporated by reference, among other things, the documents referenced in paragraph 641.19 of the Complaint.

641.20. Lehman states that the August 17, 2000 securities were offered pursuant to an Offering Memorandum. Lehman states that the Offering Memorandum speaks for itself and Lehman denies all allegations contained in paragraph 641.20 of the Complaint to the extent they are inconsistent therewith.

641.21. Lehman denies the allegations contained in paragraph 641.21 of the Complaint insofar as they are intended to relate to Lehman, except that Lehman states that LBI

participated as an initial purchaser in connection with the the September 28, 2000 offering of \$750 million of 7.797% Senior Secured Notes due 2003 and €315 million of 6.375% Senior Secured Notes due 2003 and upon information and belief that Donaldson, Lufkin & Jenrette Corp., Deutsche Banc Securities Inc., Credit Suisse First Boston Corp., and UBS Warburg LLC also participated as initial purchasers. Lehman further states upon information and belief that these Notes were publicly traded on the Luxembourg stock exchange. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 641.21 of the Complaint.

641.22. Lehman denies the allegations contained in paragraph 641.22 of the Complaint insofar as they are intended to relate to Lehman, except that Lehman states that LBI participated as an initial purchaser in connection with the the September 28, 2000 offering of \$750 million of 7.797% Senior Secured Notes due 2003 and €315 million of 6.375% Senior Secured Notes due 2003 and upon information and belief that Donaldson, Lufkin & Jenrette Corp., Deutsche Banc Securities Inc., Credit Suisse First Boston Corp., and UBS Warburg LLC also participated as initial purchasers. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 641.22 of the Complaint.

641.23. Lehman states that the Offering Memorandum for the September 28, 2000 offering incorporated by reference, among other things, the documents referenced in paragraph 641.23 of the Complaint.

641.24. Lehman states that the September 28, 2000 securities were offered pursuant to an Offering Memorandum. Lehman states that the Offering Memorandum speaks for itself and Lehman denies all allegations contained in paragraph 641.24 of the Complaint to the extent they are inconsistent therewith.

641.25. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.25 of the Complaint.

641.26. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.26 of the Complaint.

641.27. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.27 of the Complaint.

641.28. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.28 of the Complaint.

641.29. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.29 of the Complaint.

641.30. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.30 of the Complaint.

641.31. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.31 of the Complaint.

641.32. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.32 of the Complaint.

641.33. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.33 of the Complaint.

641.34. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.34 of the Complaint.

641.35. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.35 of the Complaint.

641.36. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.36 of the Complaint.

641.37. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.37 of the Complaint.

641.38. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.38 of the Complaint.

641.39. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.39 of the Complaint.

641.40. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.40 of the Complaint.

641.41. To the extent the allegations set forth in paragraph 641.41 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 641.41 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 641.41 of the Complaint.

641.42. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.42 of the Complaint.

641.43. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641.43 of the Complaint.

641.44. Lehman denies the allegations contained in paragraph 641.44 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 641.44 of the Complaint.

642. To the extent the allegations set forth in paragraph 642 contain legal conclusions, no response is required to those allegations. To the extent a response is required,

Lehman denies the allegations contained in paragraph 642 of the Complaint insofar as they are intended to suggest in any way that, in any “dealings with Enron,” Lehman breached any duty owed to anyone. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 642 of the Complaint.

643. Given the Court’s dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 643 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 643 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 643 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 643 of the Complaint.

644. Given the Court’s dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 644 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 644 of the Complaint.

645. Given the Court’s dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 645 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 645 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 645 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or

information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 645 of the Complaint.

646. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 646 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 646 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 646 of the Complaint insofar as they are intended to relate to Lehman, except that Lehman states that LB 1 Group Inc. received a copy of the "offering memorandum." In addition, Lehman denies the characterization of the "offering memorandum" contained in paragraph 646 of the Complaint. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 646 of the Complaint.

647. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 647 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations, except that Lehman admits that LB 1 Group Inc. and certain officers of LBI invested in LJM2. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 647 of the Complaint.

648. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 648 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 648 of the Complaint.

649. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 649 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 649 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 649 of the Complaint insofar as they are intended to relate to Lehman, except that Lehman admits that LB 1 Group Inc. and certain officers of LBI invested in LJM2. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 649 of the Complaint.

650. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 650 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 650 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 650 of the Complaint insofar as they are intended to relate to Lehman, except that Lehman states that the practices and procedures of one or more of LBHI's subsidiaries provide for the performance of a credit analysis in connection with loans and participation in credit facilities. Lehman further states that one or more of LBHI's subsidiaries participated in credit facilities extended to Enron and/or Enron subsidiaries and/or affiliates. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 650 of the Complaint.

651. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 651(a) – (d) of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman

denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 651(a) – (d) of the Complaint.

652. To the extent the allegations set forth in paragraph 652 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 652 of the Complaint.

653. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 653 of the Complaint.

654. To the extent the allegations set forth in paragraph 654 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 654 of the Complaint.

655. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 655 of the Complaint.

656. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 656 of the Complaint.

657. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 657 of the Complaint.

658. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 658 of the Complaint.

659. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 659 of the Complaint.

660. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 660 of the Complaint to the extent

they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 660 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 660 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 660 of the Complaint.

661. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 661 of the Complaint.

662. To the extent the allegations set forth in paragraph 662 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 662 of the Complaint.

663. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 663 of the Complaint.

664. To the extent the allegations set forth in paragraph 664 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 664 of the Complaint.

665. To the extent the allegations set forth in paragraph 665 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 665 of the Complaint.

666. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 666 of the Complaint.

667. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 667 of the Complaint.

668. To the extent the allegations set forth in paragraph 668 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 668 of the Complaint.

669. To the extent the allegations set forth in paragraph 669 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 669 of the Complaint.

670. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 670 of the Complaint.

671. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 671 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 671 of the Complaint, except that Lehman admits that Dynegy did not acquire Enron, and that Enron filed for protection under Chapter 11 of the Bankruptcy Code.

672. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 672 of the Complaint.

673. To the extent the allegations set forth in paragraph 673 contain legal conclusions, no response is required to those allegations. To the extent a response is required,

Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 673 of the Complaint.

674. To the extent the allegations set forth in paragraph 674 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 674 of the Complaint.

675. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 675 of the Complaint.

676. To the extent the allegations set forth in paragraph 676 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 676 of the Complaint.

677. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 677 of the Complaint.

678. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 678 of the Complaint.

679. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 679 of the Complaint.

680. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 680 of the Complaint.

681. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 681 of the Complaint.

682. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 682 of the Complaint.

683. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 683 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 683 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 683 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 683 of the Complaint.

684. To the extent the allegations set forth in paragraph 684 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 684 of the Complaint.

685. To the extent the allegations set forth in paragraph 685 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 685 of the Complaint.

686. To the extent the allegations set forth in paragraph 686 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 686 of the Complaint.

687. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 687 of the Complaint.

688. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 688 of the Complaint to the extent

they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 688 of the Complaint, except that Lehman admits that Dynegy did not acquire Enron, and that Enron filed for protection under Chapter 11 of the Bankruptcy Code.

689. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 689 of the Complaint.

690. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 690 of the Complaint.

691. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 691 of the Complaint.

692. To the extent the allegations set forth in paragraph 692 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 692 of the Complaint.

693. To the extent the allegations set forth in paragraph 693 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 693 of the Complaint.

694. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 694 of the Complaint.

695. To the extent the allegations set forth in paragraph 695 contain legal conclusions, no response is required to those allegations. To the extent a response is required,

Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 695 of the Complaint.

696. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 696 of the Complaint.

697. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 697 of the Complaint.

698. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 698 of the Complaint.

699. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 699 of the Complaint.

700. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 700 of the Complaint.

701. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 701 of the Complaint.

702. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 702 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 702 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 702 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 702 of the Complaint.

703. To the extent the allegations set forth in paragraph 703 contain legal conclusions, no response is required to those allegations. To the extent a response is required,

Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 703 of the Complaint.

704. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 704 of the Complaint.

705. To the extent the allegations set forth in paragraph 705 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 705 of the Complaint.

706. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 706 of the Complaint.

707. To the extent the allegations set forth in paragraph 707 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 707 of the Complaint.

708. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 708 of the Complaint.

709. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 709 of the Complaint.

710. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 710 of the Complaint.

711. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 711 of the Complaint.

712. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 712 of the Complaint.

713. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 713 of the Complaint.

714. To the extent the allegations set forth in paragraph 714 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 714 of the Complaint.

715. To the extent the allegations set forth in paragraph 715 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 715 of the Complaint.

716. To the extent the allegations set forth in paragraph 716 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 716 of the Complaint.

717. To the extent the allegations set forth in paragraph 717 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 717 of the Complaint.

718. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 718 of the Complaint.

719. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 719 of the Complaint.

720. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 720 of the Complaint.

721. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 721 of the Complaint.

722. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 722 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 722 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 722 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 722 of the Complaint.

723. To the extent the allegations set forth in paragraph 723 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 723 of the Complaint to the extent they are intended to suggest in any way that any bank that participates as an underwriter in connection with a securities offering is automatically liable for any false or misleading statements contained in a registration statement and/or prospectus of an issuer. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 723 of the Complaint.

724. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 724 of the Complaint.

725. To the extent the allegations set forth in paragraph 725 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 725 of the Complaint.

726. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 726 of the Complaint, except that Lehman states that, during the relevant time period, Enron regularly made positive representations about its businesses and financial condition upon which Lehman reasonably relied.

727. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 727 of the Complaint.

728. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 728 of the Complaint.

729. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 729 of the Complaint.

730. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 730 of the Complaint.

731. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 731 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 731 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 731 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 731 of the Complaint.

732. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 732 of the Complaint.

733. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 733 of the Complaint.

734. To the extent the allegations set forth in paragraph 734 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 734 of the Complaint.

735. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 735 of the Complaint.

736. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 736 of the Complaint.

737. To the extent the allegations set forth in paragraph 737 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 737 of the Complaint.

738. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 738 of the Complaint.

739. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 739 of the Complaint.

740. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 740 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 740 of the Complaint.

741. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 741 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such

allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 741 of the Complaint.

742. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 742 of the Complaint.

742.1. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 742.1 of the Complaint.

742.2. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 742.2 of the Complaint.

742.3. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 742.3 of the Complaint.

742.4. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 742.4 of the Complaint.

742.5. Lehman denies the allegations contained in paragraph 742.5 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 742.5 of the Complaint.

742.6. Lehman denies the allegations contained in paragraph 742.6 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 742.6 of the Complaint.

742.7. Lehman denies the allegations contained in paragraph 742.7 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 742.7 of the Complaint.

742.8. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 742.8 of the Complaint.

742.9. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 742.9 of the Complaint.

742.10. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 742.10 of the Complaint.

742.11. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 742.11 of the Complaint.

742.12. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 742.12 of the Complaint.

742.13. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 742.13 of the Complaint.

742.14. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 742.14 of the Complaint.

742.15. Lehman denies the allegations contained in paragraph 742.15 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 742.15 of the Complaint.

742.16. To the extent the allegations set forth in paragraph 742.16 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 742.16 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 742.16 of the Complaint.

742.17. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 742.17 of the Complaint.

742.18. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 742.18 of the Complaint.

742.19. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 742.19 of the Complaint.

742.20. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 742.20 of the Complaint.

742.21. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 742.21 of the Complaint.

742.22. To the extent the allegations set forth in paragraph 742.22 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 742.22 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 742.22 of the Complaint.

743. To the extent the allegations set forth in paragraph 743 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 743 of the Complaint.

744. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 744 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 744 contain legal conclusions, no response is required to those allegations. To the

extent a response is required, Lehman denies the allegations contained in paragraph 744 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 744 of the Complaint.

745. To the extent the allegations set forth in paragraph 745 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 745 of the Complaint to the extent they are intended to suggest in any way that any bank that participates as an underwriter in connection with a securities offering is automatically liable for any false or misleading statements contained in a registration statement and/or prospectus of an issuer. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 745 of the Complaint.

746. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 746 of the Complaint.

747. To the extent the allegations set forth in paragraph 747 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 747 of the Complaint.

748. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 748 of the Complaint.

749. To the extent the allegations set forth in paragraph 749 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 749 of the Complaint.

750. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 750 of the Complaint.

751. To the extent the allegations set forth in paragraph 751 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 751 of the Complaint.

752. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 752 of the Complaint.

753. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 753 of the Complaint.

754. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 754 of the Complaint.

755. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 755 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 755 of the Complaint.

756. To the extent the allegations set forth in paragraph 756 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 756 of the Complaint.

757. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 757 of the Complaint.

758. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 758 of the Complaint.

759. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 759 of the Complaint.

760. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 760 of the Complaint.

761. To the extent the allegations set forth in paragraph 761 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 761 of the Complaint.

762. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 762 of the Complaint. In addition, to the extent the allegations set forth in paragraph 762 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 762 of the Complaint.

763. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 763 of the Complaint. To the extent a response is required, Lehman denies such allegations.

764. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 764 of the Complaint. In addition, to the extent the allegations set forth in paragraph 764 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 764.

765. Lehman denies the allegations contained in paragraph 765 of the Complaint, except that Lehman states that LBI participated as an underwriter in connection with the following offerings identified in paragraph 765 of the Complaint:

- The November 1993 offering of 8 million shares of 8% Enron capital preferred shares at \$25 per share;
- The August 1997 offering of \$150 million of 6.5% Notes due August 1, 2002;
- The May 1999 offering of \$500 million of 7.375% Notes due May 15, 2019; and
- The July 7, 1998 offering of \$250 million of 6.4% Notes due July 15, 2006 and \$250 million of 6.95% Notes due July 15, 2028.

766. Lehman denies the allegations contained in paragraph 766 of the Complaint, except that Lehman states that LBI participated as an initial purchaser in connection with the following offerings identified in paragraph 766 of the Complaint:

- The August 17, 2000 offering of \$500 million of 8% Notes due 2005; and
- The September 28, 2000 offering of \$750 million of 7.797% Notes and € 315 million of 6.375% Notes due 2003 issued by Osprey Trust and Osprey I, Inc.

767. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 767 of the Complaint. In addition, to the extent the allegations set forth in paragraph 767 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 767 of the Complaint, except that Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the fourth sentence of paragraph 767 of the Complaint.

768. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 768 of the Complaint. In addition, to the extent the allegations set forth in paragraph 768 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 768 of the Complaint.

769. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 769 of the Complaint. In addition, to the extent the allegations set forth in paragraph 769 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 769 of the Complaint, except that Lehman states that LBI issued research reports on Enron during the relevant time period.

770. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 770 of the Complaint. In addition, to the extent the allegations set forth in paragraph 770 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 770 of the Complaint.

770.1. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 770.1 of the Complaint. To the extent a response is required, Lehman denies such allegations.

770.2. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 770.2 of the Complaint. To the extent a response is required, Lehman denies such allegations.

771. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 771 of the Complaint. To the extent a response is required, Lehman denies such allegations.

772. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 772 of the Complaint. In addition, to the extent the allegations set forth in paragraph 772 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 772 of the Complaint.

773. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 773 of the Complaint.

774. To the extent the allegations set forth in paragraph 774 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 774 of the Complaint.

775. To the extent the allegations set forth in paragraph 775 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 775 of the Complaint.

776. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 776 of the Complaint.

777. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 777 of the Complaint.

778. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 778 of the Complaint.

779. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 779 of the Complaint.

780. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 780 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 780 of the Complaint.

781. To the extent the allegations set forth in paragraph 781 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 781 of the Complaint.

782. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 782 of the Complaint.

783. To the extent the allegations set forth in paragraph 783 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 783 of the Complaint.

784. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 784 of the Complaint.

785. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 785 of the Complaint.

786. To the extent the allegations set forth in paragraph 786 contain legal conclusions, no response is required to those allegations. To the extent a response is required,

Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 786 of the Complaint.

787. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 787 of the Complaint.

788. To the extent the allegations set forth in paragraph 788 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 788 of the Complaint.

789. To the extent the allegations set forth in paragraph 789 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 789 of the Complaint.

790. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 790 of the Complaint.

791. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 791 of the Complaint.

792. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 792 of the Complaint.

793. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 793 of the Complaint.

794. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 794 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such

allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 794 of the Complaint.

795. To the extent the allegations set forth in paragraph 795 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 795 of the Complaint.

796. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 796 of the Complaint.

797. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797 of the Complaint.

797.1. To the extent the allegations set forth in paragraph 797.1 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.1 of the Complaint.

797.2. To the extent the allegations set forth in paragraph 797.2 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.2 of the Complaint.

797.3. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 797.3 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 797.3 of the Complaint.

797.4. To the extent the allegations set forth in paragraph 797.4 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.4 of the Complaint.

797.5. To the extent the allegations set forth in paragraph 797.5 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.5 of the Complaint.

797.6. To the extent the allegations set forth in paragraph 797.6 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.6 of the Complaint.

797.7. To the extent the allegations set forth in paragraph 797.7 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.7 of the Complaint.

797.8. To the extent the allegations set forth in paragraph 797.8 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.8 of the Complaint.

797.9. To the extent the allegations set forth in paragraph 797.9 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.9 of the Complaint.

797.10. To the extent the allegations set forth in paragraph 797.10 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.10 of the Complaint.

797.11. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.11 of the Complaint.

797.12. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.12 of the Complaint.

797.13. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.13 of the Complaint.

797.14. To the extent the allegations set forth in paragraph 797.14 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.14 of the Complaint.

797.15. To the extent the allegations set forth in paragraph 797.15 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.15 of the Complaint.

797.16. To the extent the allegations set forth in paragraph 797.16 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.16 of the Complaint.

797.17. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.17 of the Complaint.

797.18. To the extent the allegations set forth in paragraph 797.18 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.18 of the Complaint.

797.19. To the extent the allegations set forth in paragraph 797.19 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.19 of the Complaint.

797.20. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.20 of the Complaint.

797.21. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.21 of the Complaint.

797.22. To the extent the allegations set forth in paragraph 797.22 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.22 of the Complaint.

797.23. To the extent the allegations set forth in paragraph 797.23 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.23 of the Complaint.

797.24. To the extent the allegations set forth in paragraph 797.24 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.24 of the Complaint.

797.25. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.25 of the Complaint.

797.26. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.26 of the Complaint.

797.27. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.27 of the Complaint.

797.28. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.28 of the Complaint.

797.29. To the extent the allegations set forth in paragraph 797.29 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.29 of the Complaint.

797.30. To the extent the allegations set forth in paragraph 797.30 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.30 of the Complaint.

797.31. To the extent the allegations set forth in paragraph 797.31 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.31 of the Complaint.

797.32. To the extent the allegations set forth in paragraph 797.32 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 797.32 of the Complaint.

798. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 798 of the Complaint.

799. To the extent the allegations set forth in paragraph 799 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 799 of the Complaint.

800. To the extent the allegations set forth in paragraph 800 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 800 of the Complaint.

801. To the extent the allegations set forth in paragraph 801 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 801 of the Complaint.

802. To the extent the allegations set forth in paragraph 802 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 802 of the Complaint.

803. To the extent the allegations set forth in paragraph 803 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 803 of the Complaint.

804. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 804 of the Complaint.

805. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 805 of the Complaint.

806. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 806 of the Complaint.

807. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 807 of the Complaint.

808. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 808 of the Complaint.

809. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 809 of the Complaint.

810. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 810 of the Complaint.

811. To the extent the allegations set forth in paragraph 811 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 811 of the Complaint.

812. To the extent the allegations set forth in paragraph 812 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 812 of the Complaint.

813. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 813 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 813 contain legal conclusions, no response is required to those allegations. To the

extent a response is required, Lehman denies the allegations contained in paragraph 813 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 813 of the Complaint.

814. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 814 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 814 of the Complaint.

815. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 815 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 815 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 815 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 815 of the Complaint.

816. To the extent the allegations set forth in paragraph 816 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 816 of the Complaint.

817. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 817 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such

allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 817 of the Complaint.

818. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 818 of the Complaint.

819. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 819 of the Complaint.

820. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 820 of the Complaint.

821. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 821 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 821 of the Complaint.

822. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 822 of the Complaint.

823. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 823 of the Complaint.

824. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 824 of the Complaint.

825. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 825 of the Complaint.

826. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 826 of the Complaint.

827. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 827 of the Complaint.

828. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 828 of the Complaint.

829. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 829 of the Complaint.

830. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 830 of the Complaint.

831. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 831 of the Complaint.

832. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 832 of the Complaint.

833. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 833 of the Complaint.

834. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 834 of the Complaint.

835. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 835 of the Complaint.

836. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 836 of the Complaint.

837. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 837 of the Complaint.

838. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 838 of the Complaint.

839. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 839 of the Complaint.

840. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 840 of the Complaint.

841. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 841 of the Complaint.

842. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 842 of the Complaint.

843. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 843 of the Complaint.

844. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 844 of the Complaint.

845. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 845 of the Complaint.

846. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 846 of the Complaint.

847. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 847 of the Complaint.

848. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 848 of the Complaint.

849. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 849 of the Complaint.

850. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 850 of the Complaint.

851. To the extent the allegations set forth in paragraph 851 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 851 of the Complaint.

852. To the extent the allegations set forth in paragraph 852 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 852 of the Complaint.

853. To the extent the allegations set forth in paragraph 853 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 853 of the Complaint.

854. To the extent the allegations set forth in paragraph 854 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 854 of the Complaint.

855. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 855 of the Complaint.

856. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 856 of the Complaint.

857. No response is required to the allegations contained in paragraph 857 because plaintiffs have deleted that paragraph of the Complaint.

858. No response is required to the allegations contained in paragraph 858 because plaintiffs have deleted that paragraph of the Complaint.

859. No response is required to the allegations contained in paragraph 859 because plaintiffs have deleted that paragraph of the Complaint.

860. No response is required to the allegations contained in paragraph 860 because plaintiffs have deleted that paragraph of the Complaint.

861. No response is required to the allegations contained in paragraph 861 because plaintiffs have deleted that paragraph of the Complaint.

862. No response is required to the allegations contained in paragraph 862 because plaintiffs have deleted that paragraph of the Complaint.

863. No response is required to the allegations contained in paragraph 863 because plaintiffs have deleted that paragraph of the Complaint.

864. No response is required to the allegations contained in paragraph 864 because plaintiffs have deleted that paragraph of the Complaint.

865. No response is required to the allegations contained in paragraph 865 because plaintiffs have deleted that paragraph of the Complaint.

866. No response is required to the allegations contained in paragraph 866 because plaintiffs have deleted that paragraph of the Complaint.

867. No response is required to the allegations contained in paragraph 867 because plaintiffs have deleted that paragraph of the Complaint.

868. No response is required to the allegations contained in paragraph 868 because plaintiffs have deleted that paragraph of the Complaint.

869. No response is required to the allegations contained in paragraph 869 because plaintiffs have deleted that paragraph of the Complaint.

870. No response is required to the allegations contained in paragraph 870 because plaintiffs have deleted that paragraph of the Complaint.

871. No response is required to the allegations contained in paragraph 871 because plaintiffs have deleted that paragraph of the Complaint.

872. No response is required to the allegations contained in paragraph 872 because plaintiffs have deleted that paragraph of the Complaint.

873. No response is required to the allegations contained in paragraph 873 because plaintiffs have deleted that paragraph of the Complaint.

874. No response is required to the allegations contained in paragraph 874 because plaintiffs have deleted that paragraph of the Complaint.

875. No response is required to the allegations contained in paragraph 875 because plaintiffs have deleted that paragraph of the Complaint.

876. No response is required to the allegations contained in paragraph 876 because plaintiffs have deleted that paragraph of the Complaint.

877. No response is required to the allegations contained in paragraph 877 because plaintiffs have deleted that paragraph of the Complaint.

878. No response is required to the allegations contained in paragraph 878 because plaintiffs have deleted that paragraph of the Complaint.

879. No response is required to the allegations contained in paragraph 879 because plaintiffs have deleted that paragraph of the Complaint.

880. No response is required to the allegations contained in paragraph 880 because plaintiffs have deleted that paragraph of the Complaint.

881. No response is required to the allegations contained in paragraph 881 because plaintiffs have deleted that paragraph of the Complaint.

882. No response is required to the allegations contained in paragraph 882 because plaintiffs have deleted that paragraph of the Complaint.

883. No response is required to the allegations contained in paragraph 883 because plaintiffs have deleted that paragraph of the Complaint.

884. No response is required to the allegations contained in paragraph 884 because plaintiffs have deleted that paragraph of the Complaint.

885. No response is required to the allegations contained in paragraph 885 because plaintiffs have deleted that paragraph of the Complaint.

886. No response is required to the allegations contained in paragraph 886 because plaintiffs have deleted that paragraph of the Complaint.

887. No response is required to the allegations contained in paragraph 887 because plaintiffs have deleted that paragraph of the Complaint.

888. No response is required to the allegations contained in paragraph 888 because plaintiffs have deleted that paragraph of the Complaint.

889. No response is required to the allegations contained in paragraph 889 because plaintiffs have deleted that paragraph of the Complaint.

890. No response is required to the allegations contained in paragraph 890 because plaintiffs have deleted that paragraph of the Complaint.

891. No response is required to the allegations contained in paragraph 891 because plaintiffs have deleted that paragraph of the Complaint.

892. No response is required to the allegations contained in paragraph 892 because plaintiffs have deleted that paragraph of the Complaint.

893. No response is required to the allegations contained in paragraph 893 because plaintiffs have deleted that paragraph of the Complaint.

894. No response is required to the allegations contained in paragraph 894 because plaintiffs have deleted that paragraph of the Complaint.

895. No response is required to the allegations contained in paragraph 895 because plaintiffs have deleted that paragraph of the Complaint.

896. No response is required to the allegations contained in paragraph 896 because plaintiffs have deleted that paragraph of the Complaint.

897. To the extent the allegations set forth in paragraph 897 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman states upon information and belief that during the relevant time period Arthur Andersen was a firm of certified public accountants that was retained by Enron to certify its financial statements and provide other accounting advice and services. Lehman further states upon information and belief that it was Arthur Andersen's responsibility to comply with all appropriate and relevant accounting standards in connection with its accounting services to Enron, including but not limited to GAAP. Lehman further states that it relied upon the financial statements of Enron as certified by Arthur Andersen. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 897 of the Complaint.

898. Lehman admits upon information and belief the allegations contained in the first sentence of paragraph 898 of the Complaint. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 898 of the Complaint.

899. Lehman states upon information and belief that Enron's financial statements as certified by Arthur Andersen were incorporated in numerous public documents filed by Enron, which were relied upon by Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in

paragraph 899 of the Complaint, except that Lehman admits that Arthur Andersen certified Enron's financial statements for 1997 through 2000 upon which Lehman reasonably relied.

900. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 900 of the Complaint.

901. To the extent the allegations set forth in paragraph 901 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 901 of the Complaint.

902. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 902 of the Complaint.

903. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 903 of the Complaint.

904. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 904 of the Complaint.

905. To the extent the allegations set forth in paragraph 905 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 905 of the Complaint.

906. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 906 of the Complaint.

907. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 907 of the Complaint.

908. To the extent the allegations set forth in paragraph 908 contain legal conclusions, no response is required to those allegations. To the extent a response is required,

Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 908 of the Complaint.

909. To the extent the allegations set forth in paragraph 909 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 909 of the Complaint.

910. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 910 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 910 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 910 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 910 of the Complaint.

911. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 911 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 911 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 911 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 911 of the Complaint.

912. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 912 of the Complaint.

913. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 913 of the Complaint.

914. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 914 of the Complaint.

915. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 915 of the Complaint.

916. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 916 of the Complaint.

917. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 917 of the Complaint.

918. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 918 of the Complaint.

919. To the extent the allegations set forth in paragraph 919(a) – (e) contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 919(a) – (e) of the Complaint.

920. To the extent the allegations set forth in paragraph 920 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 920 of the Complaint.

921. To the extent the allegations set forth in paragraph 921 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 921 of the Complaint.

922. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 922 of the Complaint.

923. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 923 of the Complaint.

924. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 924 of the Complaint.

925. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 925 of the Complaint.

926. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 926 of the Complaint.

927. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 927 of the Complaint to the extent they are intended to relate to Lehman. To the extent a response is required, Lehman denies such allegations. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 927 of the Complaint.

928. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 928 of the Complaint.

929. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 929 of the Complaint.

930. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 930 of the Complaint.

931. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 931 of the Complaint.

932. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 932 of the Complaint.

933. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 933 of the Complaint.

934. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 934 of the Complaint.

935. To the extent the allegations set forth in paragraph 935 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 935 of the Complaint.

936. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 936 of the Complaint.

937. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 937 of the Complaint.

938. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 938 of the Complaint.

939. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 939 of the Complaint.

940. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 940 of the Complaint.

941. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 941 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 941 contain legal conclusions, no response is required to those allegations. To the

extent a response is required, Lehman denies the allegations contained in paragraph 941 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 941 of the Complaint.

942. Lehman admits upon information and belief the allegations contained in the first sentence of paragraph 942 of the Complaint. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 942 of the Complaint.

943. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 943 of the Complaint.

944. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 944 of the Complaint.

945. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 945 of the Complaint.

946. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 946 of the Complaint.

947. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 947 of the Complaint.

948. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 948 of the Complaint.

949. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 949 of the Complaint.

950. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 950 of the Complaint.

951. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 951 of the Complaint.

952. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 952(a) – (c) of the Complaint.

953. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 953 of the Complaint.

954. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 954 of the Complaint.

955. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 955 of the Complaint.

956. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 956 of the Complaint, except that Lehman admits upon information and belief that Enron restated its financial results for 1997 through 2000, which had been certified by Arthur Andersen. Lehman states it already had relied on Enron's financial statements as certified by Arthur Andersen.

957. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 957 of the Complaint.

958. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 958 of the Complaint.

959. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 959 of the Complaint.

960. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 960 of the Complaint.

961. To the extent the allegations set forth in paragraph 961 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 961 of the Complaint.

962. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 962 of the Complaint.

963. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 963 of the Complaint.

964. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 964 of the Complaint.

965. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 965 of the Complaint.

966. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 966 of the Complaint.

967. To the extent the allegations set forth in paragraph 967 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 967 of the Complaint.

968. To the extent the allegations set forth in paragraph 968 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 968 of the Complaint.

969. To the extent the allegations set forth in paragraph 969 contain legal conclusions, no response is required to those allegations. To the extent a response is required,



Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 969 of the Complaint.

970. To the extent the allegations set forth in paragraph 970 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 970 of the Complaint.

971. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 971 of the Complaint.

972. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 972 of the Complaint.

973. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 973 of the Complaint.

974. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 974 of the Complaint.

975. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 975 of the Complaint.

976. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 976 of the Complaint.

977. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 977 of the Complaint.

978. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 978 of the Complaint.

979. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 979 of the Complaint.

980. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 980 of the Complaint.

981. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 981 of the Complaint.

982. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 982 of the Complaint.

983. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 983 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 983 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 983 of the Complaint, except that Lehman admits that Enron securities were listed and publicly traded, that Enron periodically filed public reports with the SEC and regularly communicated with public investors, and that Enron was followed by securities analysts who wrote research reports on Enron.

984. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 984 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 984 of the Complaint contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies that Lehman is responsible for any injury suffered by any purchaser of Enron's publicly-traded securities during the relevant time period. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 984 of the Complaint.

985. To the extent the allegations set forth in paragraph 985 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 985 of the Complaint.

986. To the extent that the allegations set forth in paragraph 986 of the Complaint contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman admits that the Complaint purports to bring claims on behalf of the class of persons identified in paragraph 986, but denies any and all liability in this case.

987. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 987 of the Complaint.

988. To the extent that the allegations set forth in paragraph 988 of the Complaint contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 988 of the Complaint and denies that this action should be maintained as a class action.

989. To the extent that the allegations set forth in paragraph 989 of the Complaint contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in the first sentence of paragraph 989 of the Complaint and denies that this action should be maintained as a class action. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 989 of the Complaint.

990. To the extent that the allegations set forth in paragraph 990 of the Complaint contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in the first sentence of paragraph 990 of the Complaint and denies that this action should be maintained as a class action. Lehman

is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 990 of the Complaint.

991. Lehman denies the allegations contained in paragraph 991 of the Complaint and denies that this action should be maintained as a class action.

992. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 992 of the Complaint.

993. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 993 of the Complaint.

994. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 994 of the Complaint.

995. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 995 of the Complaint.

995.1 Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 995.1 of the Complaint to the extent they are intended to relate to Lehman. In addition, to the extent the allegations set forth in paragraph 995.1 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 995.1 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 995.1 of the Complaint.

996. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 996 of the Complaint.

997. Given the Court's dismissal of the 1934 Act claims against Lehman, no response is required to the allegations contained in paragraph 997 of the Complaint.

998. Given that Lehman is not named as a defendant in the “Second Claim for Relief,” no response is required to the allegations contained in paragraph 998 of the Complaint.

999. Given that Lehman is not named as a defendant in the “Second Claim for Relief,” no response is required to the allegations contained in paragraph 999 of the Complaint.

1000. Given that Lehman is not named as a defendant in the “Second Claim for Relief,” no response is required to the allegations contained in paragraph 1000 of the Complaint.

1001. Given that Lehman is not named as a defendant in the “Second Claim for Relief,” no response is required to the allegations contained in paragraph 1001 of the Complaint.

1002. Given that Lehman is not named as a defendant in the “Second Claim for Relief,” no response is required to the allegations contained in paragraph 1002 of the Complaint.

1003. Given that Lehman is not named as a defendant in the “Second Claim for Relief,” no response is required to the allegations contained in paragraph 1003 of the Complaint.

1004. Given that Lehman is not named as a defendant in the “Second Claim for Relief,” no response is required to the allegations contained in paragraph 1004 of the Complaint.

1005. In response to the allegations contained in paragraph 1005 of the Complaint, Lehman reasserts and repeats its responses to the allegations contained in paragraphs 75-86, 101, 103, 104, 108, 121, 124, 126, 134-35, 141, 151, 164-65, 236, 336, 384, 419, 421, 447-48, 450, 518, 610, 612-41 and 986-91 of the Complaint.

1006. To the extent that the allegations set forth in paragraph 1006 of the Complaint contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman admits that the Complaint purports to assert claims under Sections 11 and 15 of the Securities Act of 1933, 15 U.S.C. §§ 77k and 77o, against the defendants listed in paragraph 1006, but denies any and all liability.

1007. To the extent that the allegations set forth in paragraph 1007 of the Complaint contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1007 of the Complaint.

1008. Lehman admits upon information and belief the allegations contained in paragraph 1008 of the Complaint.

1008.1 To the extent that the allegations set forth in paragraph 1008.1(a) – (g) of the Complaint contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1008.1(a) – (g) of the Complaint.

1009. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1009 of the Complaint.

1010. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1010 of the Complaint.

1011. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1011 of the Complaint.

1012. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1012 of the Complaint.

1013. To the extent that the allegations set forth in paragraph 1013 of the Complaint contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 1013 of the Complaint insofar as they are intended to relate to Lehman, except that Lehman states that LBI participated as an underwriter in connection with the offerings of the 7.375% Notes and 7.875%

Notes. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 1013 of the Complaint.

1014. To the extent that the allegations set forth in paragraph 1014 of the Complaint contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 1014 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 1014 of the Complaint.

1015. To the extent that the allegations set forth in paragraph 1015 of the Complaint contain legal conclusions, no response is required. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1015 of the Complaint.

1016. No response is required to the allegations contained in paragraph 1016 because plaintiffs have deleted that paragraph of the Complaint.

1016.1. For its response to paragraph 1016.1 of the Complaint, Lehman reasserts and repeats its responses to the allegations contained in the foregoing paragraphs of the Complaint.

1016.2. To the extent that the allegations set forth in paragraph 1016.2 of the Complaint contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman admits that the Complaint purports to assert claims under Sections 12(a)(2) and 15 of the Securities Act of 1933, 15 U.S.C. §§ 77l and 77o, against the defendants listed in paragraph 1016.2, but denies any and all liability.

1016.3. Lehman states that the Complaint speaks for itself and Lehman denies all allegations contained in paragraph 1016.3 of the Complaint to the extent they are inconsistent therewith.

1016.4. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1016.4 of the Complaint.

1016.5. To the extent that the allegations set forth in paragraph 1016.5 of the Complaint contain legal conclusions, no response is required. To the extent a response is required, Lehman denies the allegations contained in paragraph 1016.5 insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 1016.5 of the Complaint.

1016.6. To the extent that the allegations set forth in paragraph 1016.6 of the Complaint contain legal conclusions, no response is required. To the extent a response is required, Lehman denies the allegations contained in paragraph 1016.6 insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 1016.6 of the Complaint.

1016.7. To the extent that the allegations set forth in paragraph 1016.7 of the Complaint contain legal conclusions, no response is required. To the extent a response is required, Lehman denies the allegations contained in paragraph 1016.7 insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 1016.7 of the Complaint.

1016.8. To the extent that the allegations set forth in paragraph 1016.8 of the Complaint contain legal conclusions, no response is required. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1016.8 of the Complaint.

1016.9. To the extent that the allegations set forth in paragraph 1016.9 of the Complaint contain legal conclusions, no response is required. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1016.9 of the Complaint.

1016.10. For its response to paragraph 1016.10 of the Complaint, Lehman reasserts and repeats its responses to the allegations contained in paragraphs 1 through 991 of the Complaint.

1016.11. Lehman admits that the Complaint purports to assert claims under Tex. Rev. Civ. Stat. art. 581-33A(2), but denies any and all liability. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 1016.11 of the Complaint.

1016.12. Lehman admits that the Complaint purports to assert claims under Tex. Rev. Civ. Stat. art. 581-33A(2) against the defendants identified in paragraph 1016.12 of the Complaint, but denies any and all liability.

1016.13. To the extent that the allegations set forth in paragraph 1016.13 of the Complaint contain legal conclusions, no response is required. To the extent a response is required, Lehman denies the allegations contained in paragraph 1016.13 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 1016.13 of the Complaint.

1016.14. To the extent that the allegations set forth in paragraph 1016.14 of the Complaint contain legal conclusions, no response is required. To the extent a response is required, Lehman denies the allegations contained in paragraph 1016.14 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 1016.14 of the Complaint.

1016.15. To the extent that the allegations set forth in paragraph 1016.15 of the Complaint contain legal conclusions, no response is required. To the extent a response is required, Lehman denies the allegations contained in paragraph 1016.15 of the Complaint insofar as they are intended to relate to Lehman, except that Lehman states that LBI participated as an underwriter in connection with the July 1998 offering of the 6.40% Notes and the 6.95% Notes, and that upon information and belief Enron filed a Registration Statement and Prospectus with the SEC in connection with the offering of the Notes. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 1016.15 of the Complaint.

1016.16. Lehman denies the allegations contained in paragraph 1016.16 of the Complaint insofar as they are intended to relate to Lehman, except that Lehman admits that LBI reviewed the Registration Statement and/or Prospectus relating to the 6.40% Notes and the 6.95% Notes. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 1016.16 of the Complaint.

1016.17. To the extent that the allegations set forth in paragraph 1016.17 of the Complaint contain legal conclusions, no response is required. To the extent a response is required, Lehman denies the allegations contained in paragraph 1016.17 insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a

belief as to the truth of the remaining allegations contained in paragraph 1016.17 of the Complaint.

1016.18. Lehman denies the allegations contained in paragraph 1016.18 insofar as they are intended to relate to Lehman, except that Lehman states that LBI participated as an underwriter in connection with the sale of the 6.40% Notes and the 6.95% Notes, and that LBI received underwriting fees. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 1016.18 of the Complaint.

1016.19. Lehman denies the allegations contained in paragraph 1016.19(a) – (b) of the Complaint insofar as they are intended to relate to Lehman, except that Lehman states upon information and belief that a registration statement and prospectus were filed with the SEC in connection with the July 1998 offering of the 6.40% Notes and the 6.95% Notes. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 1016.19(a) – (b) of the Complaint.

1016.20. Lehman denies the allegations contained in paragraph 1016.20 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 1016.20 of the Complaint.

1016.21. To the extent the allegations set forth in paragraph 1016.21 contain legal conclusions, no response is required to those allegations. To the extent a response is required, Lehman denies the allegations contained in paragraph 1016.21 of the Complaint insofar as they are intended to relate to Lehman. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 1016.21 of the Complaint.

1016.22. Lehman admits that plaintiff Washington Board is seeking the relief set forth in paragraph 1016.22 of the Complaint but denies that it is entitled to such relief.

1016.23. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1016.23 of the Complaint.

1016.24. Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1016.24 of the Complaint.

1016.25. For its response to paragraph 1016.25 of the Complaint, Lehman reasserts and repeats its responses to the allegations contained in paragraphs 1 through 991 and paragraphs 1016.11 through 1016.24 of the Complaint.

1016.26. Lehman admits that the Complaint purports to assert claims under Tex. Rev. Civ. Stat. art. 581-33(a)(2), but denies any and all liability. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 1016.26 of the Complaint.

1016.27. To the extent that the allegations set forth in paragraph 1016.27 of the Complaint contain legal conclusions, no response is required. To the extent a response is required, Lehman admits that the Complaint purports to assert claims under the Texas Securities Act against the defendants listed in paragraph 1016.27 of the Complaint. Lehman is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 1016.27 of the Complaint.

1016.28. To the extent that the allegations set forth in paragraph 1016.28 of the Complaint contain legal conclusions, no response is required. To the extent a response is required, Lehman is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1016.28 of the Complaint.

TWELFTH DEFENSE

12. Plaintiffs and members of the class who plaintiffs purport to represent failed to exercise due care and/or mitigate their damages with respect to the transactions alleged to form the basis of the claims against Lehman.

THIRTEENTH DEFENSE

13. Lehman is not liable because it was entitled to, and did, reasonably and in good faith rely upon the work and conclusion of professionals and experts.

FOURTEENTH DEFENSE

14. Lehman is not liable because the conduct of persons and/or entities other than Lehman was a superseding or intervening cause of any damage, loss, or injury sustained by plaintiffs or the purported class members.

FIFTEENTH DEFENSE

15. Lehman is not liable because plaintiffs' alleged damages were not actually or proximately caused by Lehman.

SIXTEENTH DEFENSE

16. Lehman hereby adopts and incorporates by reference any and all other defenses asserted or to be asserted by any of the other defendants to the extent that Lehman may share in such a defense.

WHEREFORE, Lehman prays for judgment against plaintiffs and in its favor, that plaintiffs take nothing by the Complaint, for its costs and reasonable attorneys' fees, and for such other and further relief as the Court may deem just and proper.

April 30, 2004

Respectfully submitted,



---

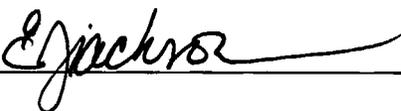
Hugh R. Whiting  
Attorney-in-Charge  
Texas Bar No. 21373500  
S.D. Admission No. 30188  
JONES DAY  
717 Texas, Suite 3300  
Houston, Texas 77002-3008  
Tel: (832) 239-3939  
Fax: (832) 239-3600

David L. Carden  
Robert C. Micheletto  
JONES DAY  
222 E. 41st Street  
New York, New York 10017-6702  
Tel: (212) 326-3939  
Fax: (212) 755-7306

*Attorneys for Lehman Brothers Holdings Inc.  
and Lehman Brothers Inc.*

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing instrument was served on the attorneys of record for all parties to the above cause through esl3624.com in accordance with the Court's order regarding website service on the 30th day of April 2004.

  
\_\_\_\_\_