United States Courts
Southern District of Texas
FILED

APR 16 2002

Michael N. Milby, Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re ENRON CORPORATION SECURITIES LITIGATION	§	Civil Action No. H-01-3624 **(Consolidated)**
This Document Relates To:	§	CLASS ACTION
MARK NEWBY, et al., Individually and On Behalf of All Others Similarly Situated, Plaintiffs,	§	
vs.	§	
ENRON CORP., et al., Defendants.	§	

LEAD PLAINTIFF'S OPPOSITION TO MOTION TO EXTEND TIME TO ANSWER, MOVE OR OTHERWISE RESPOND TO THE CONSOLIDATED COMPLAINT

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In response to certain defendants' motion for an extension of time in which to respond to the Consolidated Complaint, Lead Plaintiff does not believe that an extension is warranted.[1] While the Consolidated Complaint is long and detailed, all of these defendants have known about their involvement with Enron for years and, in the last several months, there has been a great amount of publicity regarding the Enron fraud. Given the extensive factual detail in the Consolidated Complaint, we believe that the motions to dismiss should be limited to legal issues with which experienced lawyers, such as those who represent defendants here, are familiar. Accordingly, we believe that there is no reason to change the schedule previously set by the Court. However, Lead Plaintiff respectfully requests that if defendants are granted the requested extension, Lead Plaintiff be granted parity in responding to those motions. That is, if defendants are given six weeks to respond to the Complaint, Lead Plaintiff should be given six weeks to oppose their motions.

DATED: April 16, 2002

Respectfully submitted,

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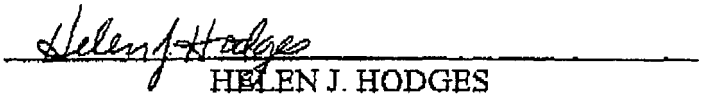

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[1] When counsel for the Outside Directors asked plaintiff's Lead Counsel for an extension, defendants' counsel could not represent that counsel for all new defendants would accept service of the Consolidated Complaint. Thus, agreeing to an extension for some defendants would not establish a uniform response date for all defendants. Plaintiff's Lead Counsel is making every effort to personally serve all new defendants, some of whom are outside the United States.

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DECLARATION OF SERVICE BY E-MAIL

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and a resident of the County of San Diego, over the age of 18 years, and not a party to or interest in the within action; that declarant's business address is 401 B Street, Suite 1700, San Diego, California 92101.

2. That on April 16, 2002, declarant served the LEAD PLAINTIFF'S OPPOSITION TO MOTION TO EXTEND TIME TO ANSWER, MOVE OR OTHERWISE RESPOND TO THE CONSOLIDATED COMPLAINT by sending via e-mail, facsimile or UPS overnight to the parties as indicated on the attached Service List, pursuant to the Court's April 10, 2002 Order Regarding Service of Papers and Notice of Hearings.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of April, 2002, at San Diego, California.

Debbie Granger

DEBBIE GRANGER

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