United States Courts
Southern District of Texas
FILED
APR 17 2002
Michael N. Milby, Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re ENRON CORP. SECURITIES LITIGATION	Consolidated Lead Case No. H-01-3624
RALPH A. WILT, JR., et al., Plaintiffs, v. ANDREW S. FASTOW, et al., Defendants.	Civil Action No. H-02-0576

FILED
2002 APR 17 PM 2:17
U.S. COURTS
SOUTHERN DISTRICT
OF TEXAS

ORIGINAL

PLAINTIFFS' NOTICE OF AND JOINDER IN PRIOR RESPONSE TO THE VINSON & ELKINS DEFENDANTS' MOTION TO OPPOSE CONSOLIDATION AND TO SEVER THE CLAIMS AGAINST THEM

The Response of Plaintiff Ralph A. Wilt, Jr., in Support of the Court's Order of Consolidation and in Opposition to the Vinson & Elkins Defendants' Motion to Sever Themselves from Consolidated Lead Action; and Request for Oral Argument Pursuant to Local Rule 7.5.a (the "Response"), was filed on March 25, 2002. The Response is Pacer No. 410 on the Court's electronic docket and is incorporated by this reference.

Plaintiffs Kieran J. Mahoney and David I. Levine hereby join in the Response.

Plaintiffs Wilt, Mahoney, and Levine note that the inclusion of Vinson & Elkins as a defendant in the Consolidated Complaint filed by lead class counsel in the *Newby*

500

matter largely undermines the Vinson & Elkins Defendants' key argument for severance, to wit, that they have not been named in any action except *Wilt*. They now have been.

Dated: April 15, 2002

Respectfully Submitted,

JUDICIAL WATCH, INC.

By: _____

James Fraser Marshall, Esq.
Pro Hac Vice
Attorney in Charge for Plaintiffs
2540 Huntington Drive, Suite 201
San Marino, CA 91108-2601
Telephone: (626) 287-4540
Telecopier: (626) 237-2003

CERTIFICATE OF SERVICE

In re ENRON Corp. Securities Litigation
Consolidated Lead Case No. H-01-3624

Wilt v. Fastow,
Case No. H-02-0576

I certify that on April 15, 2002, I served a true and correct copy of the foregoing document by e-mail on the following attorneys of record at the e-mail address indicated:

Linda L. Addison Fulbright & Jaworski LLP	Email Address: laddison@fulbright.com
Steve W. Berman Hagens Berman, LLP	Email Address: steve@hagens-berman.com
Robert Hayden Burns Burns Wooley & Marseglia	Email Address: hburns@bwmzlaw.com
James E. Coleman, Jr. Carrington, Coleman, Sloman & Blumenthal, LLP	Email Address: deakin@ccsb.com
Jeremy L. Doyle Gibbs & Bruns, LLP	Email Address: jdoyle@gibbs-bruns.com
Anthony C. Epstein Steptoe & Johnson, LLP	Email Address: aepstein@steptoe.com
G. Sean Jez Fleming & Associates	Email Address: terri_raybourn@fleming-law.com
Barry G. Flynn Law Offices of Barry G. Flynn, PC	Email Address: bgflaw@mywavenet.com
Mark K. Glasser King & Spalding	Email Address: mkglasser@kslaw.com
H. Bruce Golden Golden & Owens, LLP	Email Address: golden@goldenowens.com
Roger B. Greenberg Schwartz, Junell, Campbell & Oathout	Email Address: rgreenberg@schwartz-junell.com
Mark C. Hansen Reid M. Figel Kellogg, Huber, Hansen, Todd & Evans, PLLC	Email Address: mhansen@khhte.com rfigel@khhte.com
Rusty Hardin Rusty Hardin & Associates, PC	Email Address: rhardin@rustyhardin.com

Robin Harrison Campbell, Harrison & Wright, LLP	Email Address: rharrison@chd-law.com
Sharon Katz Davis Polk & Wardwell	Email Address: andersen.courtpapers@dpw.com
Charles G. King King & Pennington, LLP	Email Address: cking@kandplaw.com
Jeffrey C. King Hughes & Luce, LLP	Email Address: kingj@hughesluce.com
Bernard V. Preziosi, Jr. Curtis, Mallet-Prevost, Colt & Mosle, LLP	Email Address: bpreziosi@cm-p.com
William S. Lerach G. Paul Howes Helen J. Hodges Milberg Weiss Bershad Hynes & Lerach	Email Address: enron@milberg.com
Kenneth S. Marks Susman Godfrey, LLP	Email Address: kmarks@susmangodfrey.com
William F. Martson, Jr. Tonkon Torp LLP	Email Address: rick@tonkon.com
John J. McKetta, III Graves, Dougherty, Hearon & Moody, PC	Email Address: mmcketta@gdhm.com
Andrew J. Mytelka David Le Blanc Greer, Herz & Adams, LLP	Email Address: dleblanc@greerherz.com bnew@greerherz.com amytelka@greerherz.com swindsor@greerherz.com
John L. Murchison, Jr. Vinson & Elkins, LLP	Email Address: jmurchison@velaw.com
Eric J. R. Nichols Beck, Redden & Secrest	Email Address: enichols@brsfirm.com
Jack C. Nickens Nickens, Lawless & Flack, LLP	Email Address: trichardson@nlf-law.com
Gary A. Orseck Robbins, Russell, Englert, Orseck & Untereiner LLP	Email Address: gorseck@robbinsrussell.com
Lynn Lincoln Sarko Keller Rohrback LLP	Email Address: lsarko@kellerrohrback.com
Scott B. Schreiber Arnold & Porter	Email Address: scott_schreiber@aporter.com

Henry S. Schuelke, III Robert Sutton Janis, Schuelke & Wechsler	Email Address: hsschuelke@janisschuelke.com rsutton@janisschuelke.com
Billy Shepherd Cruse, Scott, Henderson & Allen, LLP	Email Address: bshepherd@crusescott.com
Craig Smyser Smyser Kaplan & Veselka, LLP	Email Address: csmyser@skv.com
Robert M. Stern O'Melveny & Myers, LLP	Email Address: rstern@omm.com
Abigail Sullivan Bracewell & Patterson LLP	Email Address: asullivan@bracepatt.com
John K. Villa Williams & Connolly, LLP	Email Address: jvilla@wc.com
Paul Vizcarrondo, Jr. Wachtell, Lipton, Rosen Katz	Email Address: pvizcarrondo@wlrk.com

James Fraser Marshall

I certify that on April 15, 2002, I served a true and correct copy of the foregoing document by fax on the following person at the fax number indicated:

Carolyn S. Schwartz United States Trustee, Region 2	Fax Number: (212) 668-2255

I certify that on April 15, 2002, I served a true and correct copy of the foregoing document, by first class mail, on the following person at the address indicated:

Dr. Bonnee Linden, Pro Se
Linden Collins Associates
1226 West Broadway
P.O. Box 114
Hewlett, New York 11557

CONSTANCE S. RUFFLEY