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SOUTHERN DISTRICT OF TEXAS
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MICHAEL R. MILBY, CLERK OF COURT

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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)

§ CLASS ACTION

**AMENDED NOTICE OF MOTION AND OPPOSED MOTION TO
APPOINT AMALGAMATED BANK, THE REGENTS OF THE
UNIVERSITY OF CALIFORNIA, DEUTSCHE ASSET MANAGEMENT,
HBK INVESTMENTS, AND THE CENTRAL STATES PENSION FUND
AS LEAD PLAINTIFF AND TO APPROVE LEAD
PLAINTIFF'S CHOICE OF CO-LEAD AND CO-LIAISON COUNSEL**

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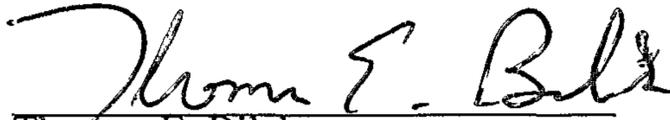
TO: THE HONORABLE JUDGE OF SAID COURT AND
ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Amalgamated Bank, the Regents of the University of California, Deutsche Asset Management, HBK Investments, and the Central States Pension Fund (the "Enron Institutional Investor Group" or "Movants"), who acquired securities of Enron Corp. ("Enron") between October 19, 1998 and November 27, 2001 (the "Class Period") move this Court for an order granting their motion for appointment of lead plaintiff and approval of Co-Lead and Co-Liaison Counsel.

The Motion is brought pursuant to §27(a)(3)(B) of the Securities Act of 1933 (the "Securities Act"), 15 U.S.C. §§77z-1(a)(3)(B) and 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. §78u-4(a)(3)(B) for their appointment as lead plaintiff for the class on the grounds that Movants have timely filed the instant motion, and are the "most adequate plaintiff." In addition, Movants seek the Court's approval of their selection of Milberg Weiss Bershad Hynes & Lerach LLP and Lovell & Stewart, LLP as Co-Lead Counsel and Schwartz, Junell, Campbell, & Oathout, LLP and Hoeffner, Bilek & Eidman, L.L.P. as Co-Liaison Counsel, pursuant to §27(a)(3)(B)(v) of the Securities Act, 15 U.S.C., §77z-1(a)(3)(B)(v), and §21D(a)(3)(B)(v) of the Exchange Act, 15 U.S.C. §78u-4(a)(3)(B)(v)).

The Motion is based on: (1) the memorandum of law filed in this matter on December 21, 2001; (2) the Declaration of James I. Jaconette, with exhibits filed in this matter on December 21, 2001; (3) a proposed order granting the relief requested; and (4) the pleadings, and such other written or oral argument as may be permitted by the Court.

Dated: December 21, 2001



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CERTIFICATE OF CONFERENCE

This motion is opposed.


Thomas E. Bilek

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure, I hereby certify that a true and correct copy of this instrument has been forwarded to all counsel of record, via certified mail, return receipt requested, and/or via facsimile, and/or via U.S. Mail on this 26th day of December, 2001.


Thomas E. Bilek