

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION (CHICAGO)**

SECURITIES AND EXCHANGE COMMISSION,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	Civil Action No. 1:07cv1208
	:	ECF
ONE OR MORE UNKNOWN PURCHASERS OF CALL OPTIONS FOR THE COMMON STOCK OF TXU CORP., et al.,	:	Judge Lindberg
	:	
Defendants.	:	

**AGREED MOTION TO ENTER AGREED FINAL JUDGMENTS
AGAINST DEFENDANTS SUNIL SEHGAL, SEEMA SEHGAL, AND HAFIZ NASEEM**

Plaintiff Securities and Exchange Commission (“Commission”) files this Agreed Motion to Enter Agreed Final Judgments Against Defendants Sunil Sehgal and Seema Sehgal (together, the “Sehgal Defendants”), and Hafiz Naseem, and respectfully shows the Court as follows:

1. The Commission has engaged in settlement discussions with the Sehgal Defendants and with Hafiz Naseem (collectively, “Defendants”), resulting in the presentation of offers of settlement to the Commission, which the Commission accepted. Defendants’ settlement offers are contained in their signed Consents, which the Commission is filing simultaneously with this agreed motion. True and correct copies of the Consents are attached as Exhibits A, B, and C to this motion.

2. Under the terms of the settlement agreements, Defendants have consented to the entry of final judgments that permanently restrain and enjoin them from violating, directly or indirectly, certain of the federal securities laws.

3. As a term of their Consents, Defendants have agreed that the Commission could present the Agreed Judgments to the Court without further notice. However, counsel for the Commission has conferred with counsel for each of the Defendants and represents to the Court that this motion is unopposed. The proposed Agreed Final Judgments are attached to this motion.

4. The proposed Agreed Final Judgments provide that the Defendants will remit all payments due per the terms of the Judgment to the registry of this Court. Once the funds are received, the Commission will move the Court to appoint a distribution agent to oversee the distribution of the funds to the harmed investors.

5. Accordingly, the Commission respectfully requests that the Court enter the proposed Agreed Final Judgments.

DATED: January 12, 2009

Respectfully submitted,

/s/Jennifer D. Brandt
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CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of January 2009, I electronically filed the foregoing *Agreed Motion to Enter Agreed Final Judgments Against Defendants Sunil Sehgal, Seema Sehgal and Hafiz Naseem* and *Notice of Presentment* with the Clerk of the Court for the Northern District of Illinois, Eastern Division, by using the CM/ECF system which will send a notice of electronic filing to the CM/ECF participants, and also served the Motion and Notice on all known adverse parties by causing a true and correct copy thereof to be delivered to each of them in the manner indicated below:

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