

Stipulation), which is under the control of the Escrow Agent (as defined in the Stipulation). In addition, as noted in the Settling Parties' joint-letter so-ordered by the Court on January 24, 2013 (ECF No. 1022), the Settling Defendants have facilitated Plaintiffs' Lead Counsel's receipt of a bank guarantee for \$25,000,000.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 31, 2013
New York, New York

/s/ Jeffrey L. Roether
Jeffrey L. Roether, Esq.