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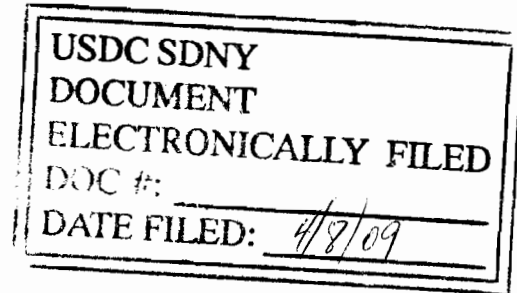
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE TREMONT SECURITIES LAW,  
STATE LAW AND INSURANCE  
LITIGATION

Master File No: 08 Civ. 11117 (TPG)

This Document Relates To:

Insurance Action, No. 09 Civ. 557



**STIPULATION**

**IT IS HEREBY STIPULATED AND AGREED** that Ernst & Young LLP

("Defendant") received a copy of the complaint in The Harriet Rutter Klein Revocable Trust v.

Tremont Group Holdings, Inc., et al., No. 09 Civ. 2253, The Matthew L. Klein Irrevocable

Family Trust v. Tremont Group Holdings, Inc., et al., No. 09 Civ. 2254, and in The Geoffrey

Rabie Credit Shelter Trust v. Tremont Group Holdings, Inc., et al., 09 Civ. 1466 (collectively, the

"Klein Trust and Geoffrey Rabie Actions"), all three of which have been consolidated for pretrial

proceedings into the above-referenced Insurance Action pursuant to this Court's Order dated

March 26, 2009. (Master Dkt. 44.)

**IT IS FURTHER STIPULATED AND AGREED** that Defendant agrees to save the

cost of serving summonses in the Klein Trust and Geoffrey Rabie Actions by not requiring that it

be served with judicial process in the manner provided by Rule 4 of the Federal Rules of Civil

Procedure. The Defendant will retain all defenses or objections to the lawsuit or to the

jurisdiction or venue of the Court except for objections based on a defect in the summonses or in

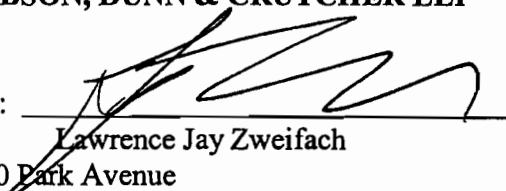
the service of the summonses.

**IT IS FURTHER STIPULATED AND AGREED** that Defendant shall have no obligation to respond to the individual complaints filed in the Klein Trust and Geoffrey Rabie Actions, but shall respond on or before May 20, 2009 to the amended complaint scheduled to be filed by plaintiffs on or before April 20, 2009 in accordance with the schedule established by the Court.

Dated: April 3, 2009

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**Interim Co-Lead Counsel for Plaintiffs**

SO ORDERED: April 8, 2009

Thomas P. Grisa  
U.S.D.J.