

CERTIFICATE OF SERVICE

I, Nathaniel C. Giddings, hereby certify that on December 5, 2014, a true and correct copy of (1) Individual Defendants' Memorandum of Law Regarding the Application of *Res Judicata*, Collateral Estoppel, and Law of the Case, (2) Declaration of James J. Pizzirusso, and (3) supporting exhibits were served, via the Electronic Case Filing (ECF) system in the United States District Court for the Southern District of New York, on all parties registered for CM/ECF in the above-captioned matter.

Dated: December 5, 2014

/s/ Nathaniel C. Giddings

Nathaniel C. Giddings (*pro hac vice*)

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