

CERTIFICATE OF SERVICE

I, Nathaniel C. Giddings, hereby certify that on December 23, 2014, a true and correct copy of Individual Defendants' Reply Memorandum of Law Regarding the Application of Res Judicata, Collateral Estoppel, and Law of The Case was 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 23, 2014

/s/ Nathaniel C. Giddings

Nathaniel C. Giddings (*pro hac vice*)

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