



¶101 & Ex. 4, ¶16. A significant portion of these expenses have been incurred in connection with the retention and preparation of expert witnesses. *See, id.*

3. Subsequent to the filing of the Motion, Class Counsel learned that \$259,624.03 in unpaid expert fees were inadvertently omitted from Class Counsel's request for reimbursement of expenses. These fees were incurred entirely in association with: (1) the preparation of expert reports submitted during discovery in this case, and (2) the preparation of an expert witness for potential testimony at trial.

4. As fully described in the Lead Counsel Affidavit, Class Counsel incurred \$3,330,791.79 expenses in the prosecution of this case. The additional expert fees described above bring the total expenses incurred by Class Counsel to \$3,590,415.82. Of these expenses, approximately 90% have been paid by Class Counsel; the remaining expenses (some of which have only recently been incurred or billed for) are owed by Class Counsel and are in the process of being paid. Accordingly, and for reasons fully set forth in the Motion, Class Counsel respectfully request reimbursement of \$3,590,415.82 for expenses.

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

Executed this 8<sup>th</sup> day of April, 2009.

  
BARRY S. TAUS

Sworn to this <sup>07<sup>th</sup></sup> day of  
April, 2008.

  
NOTARY PUBLIC

**BRETT CEBULASH**  
Notary Public State of New York  
No. 02CE6072120  
Qualified in New York County  
Commission Expires March 25, 2010