

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE MBIA, INC., SECURITIES
LITIGATION

File No. 08-CV-264-KMK

**NOTICE OF LEAD COUNSEL'S MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 23(e) and 23(h) and this Court's Order Preliminarily Approving Proposed Settlement and Providing for Notice dated September 20, 2011, and upon the Declaration of Steven B. Singer in Support of (A) Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation and (B) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; the Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; and all other papers and proceedings herein, Lead Counsel will and does hereby move this Court on December 15, 2011 at 2:00 p.m. in the Courtroom of the Honorable Kenneth M. Karas, United States District Judge for the Southern District of New York, at The Hon. Charles L. Briant Jr. Federal Building and United States Courthouse, 300 Quarropas Street, White Plains, New York, or at such other location and time as set by the Court, for entry of an Order awarding attorneys' fees and reimbursement of litigation expenses to Lead Counsel and awarding reimbursement of costs and expenses incurred by Lead Plaintiff.

Dated: November 10, 2011

Respectfully submitted,

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/s Steven B. Singer

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