EXHIBIT A

(Ordinary Course Professional Affidavit)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re	:	Chapter 11 Case No.
LEHMAN BROTHERS HOLDINGS INC., *et al.*,	:	08-13555 (JMP)
Debtors.	:	(Jointly Administered)

AFFIDAVIT AND DISCLOSURE STATEMENT OF EVGENY N. ZELENSKY, ON BEHALF OF HERBERT SMITH CIS LLP

Evgeny N. Zelensky, being duly sworn, upon his oath, deposes and says:

1. I am a partner of Herbert Smith CIS LLP, located at 10 Ulitsa Nikolskaya, Moscow 109012, a Moscow branch of Herbert Smith LLP located at Exchange House, Primrose Street, London EC2A 2HS (the "Firm").

2. Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (together, the "Debtors" and, collectively with their non-debtor affiliates, "Lehman"), have requested that the Firm provide Russian law advice to the Debtors, and the Firm has consented to provide such services.

3. The Firm may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties in interest in these chapter 11 cases. The Firm does not perform services for any such person in connection with these chapter 11 cases with respect to those matters that come within the scope of the Firm's

representation of the Debtors. The Firm currently represents clients outside of the Russian Federation on various non-Russian law-related matters arising in connection with the above referenced chapter 11 cases, including on matters related to termination of various derivatives transactions. The Firm also provides legal services to non-debtor affiliates of Lehman Brothers Holdings Inc. that are unrelated to these chapter 11 cases. These services will be paid for by those non-debtor entities.

4. Neither I, nor any principal of, or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principals and regular employees of the Firm.

5. Neither I, nor any principal of, or professional employed by the Firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or their estates.

6. The Debtors owe the Firm USD 40,167 for prepetition services provided to Lehman Brothers Holdings Inc.

7. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Affidavit.[1]

By: Eugeny N. Zelensky

Subscribed and sworn to before me
this 12 day of November 2008

Notary Public

[1] If necessary.

EXHIBIT B

(Retention Questionnaire)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re	:	**Chapter 11 Case No.**
LEHMAN BROTHERS HOLDINGS INC., *et al.*,	:	**08-13555 (JMP)**
Debtors.	:	**(Jointly Administered)**

RETENTION QUESTIONNAIRE

TO BE COMPLETED BY PROFESSIONALS EMPLOYED BY LEHMAN BROTHERS HOLDINGS INC. OR ANY OF ITS DEBTOR AFFILIATES (collectively, the "Debtors")

DO NOT FILE THIS QUESTIONNAIRE WITH THE COURT.
RETURN IT FOR FILING BY THE DEBTORS, TO:

Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, New York 10153
Attn: Jennifer Sapp
Christopher Stauble

All questions **must** be answered. Please use "none," "not applicable," or "N/A," as appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address of firm:

   Herbert Smith CIS LLP
   10 Ulitsa Nikolskaya
   Moscow 109012

   Herbert Smith CIS LLP is the Moscow branch of Herbert Smith LLP located at:

   Herbert Smith LLP
   Exchange House, Primrose Street
   London EC2A 2HS

2. Date of retention: October 15, 2008

3. Type of services provided (accounting, legal, etc.): Legal services

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4. Brief description of services to be provided:

Advice to the Debtors with respect to Russian law matters. In addition, we are providing legal advice to OOO Lehman Brothers, a non-Debtor Russian subsidiary of Lehman Brothers Holdings Inc.

5. Arrangements for compensation (hourly, contingent, etc.):

Hourly

(a) Average hourly rate (if applicable):

Grades description	Hourly rate (US$)
Partner/Consultant	980
Senior associate	690
Mid-level associate	630
Junior associate	520
Trainees	400
Paralegals	170

(b) Estimated average monthly compensation based on prepetition retention (if firm was employed prepetition): USD 15,000

6. Prepetition claims against the Debtors held by the firm:

Amount of claim: Aggregate amount of USD 40,167

Date claim arose: Prior to September 15, 2008

Source of Claim: Legal services provided to Lehman Brothers Holdings Inc.

7. Prepetition claims against the Debtors held individually by any member, associate, or professional employee of the firm: None

8. Stock of the Debtors currently held by the firm:

Kind of shares: None

No. of shares: N/A

9. Stock of the Debtors currently held individually by any member, associate, or professional employee of the firm:

Name: None

Status: N/A

Kind of shares: N/A

No. of shares: N/A

10. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates with respect to the matters on which the above-named firm is to be employed:

The Firm currently represents clients outside of the Russian Federation in connection with various non-Russian law matters arising in connection with the above referenced chapter 11 cases, including on matters related to termination of various derivatives transactions

11. Name of individual completing this form:

Evgeny N. Zelensky, Esq., partner

/ Евгений Зеленский /