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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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

**SUPPLEMENTAL VERIFIED STATEMENT OF SATTERLEE  
STEPHENS BURKE & BURKE LLP PURSUANT TO RULE  
2019 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Christopher R. Belmonte, a member of the firm of Satterlee Stephens Burke & Burke LLP (“SSB&B”), as attorneys for the entities listed below (collectively, the “Entities”), in connection with the above-referenced chapter 11 cases of Lehman Brothers Holdings, Inc., makes the following statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure:

1. As of the date of this Statement, SSB&B has been retained by the Entities in connection with these Chapter 11 bankruptcy cases.
2. Information pertinent to these claims and interest, as required by Rule 2019(a) of the Federal Rules of Bankruptcy Procedure, is as follows:

Name	Address	Nature of Claim or Interest
Moody’s Corporation (“ <u>Moody’s</u> ”)	7 World Trade Center at 250 Greenwich Street New York, NY 10007	Trade Claim related to executory contracts (resolved)

<b>Name</b>	<b>Address</b>	<b>Nature of Claim or Interest</b>
International Business Machines Corporation (“ <u>IBM</u> ”)	Thomas Hagen, Esq. IBM Building 4, Office 2B18 Maildrop 4202, Route 100 Somers NY 10589	Trade Claim related to executory contracts (resolved)
IBM Personal Pension Plan Trust (“ <u>IBM Trust</u> ”)	Jihwan Kim, Esq. IBM Corporation c/o IBM Retirement Funds 1133 Westchester Avenue White Plains, New York 10604	Claim related to investment of pension funds (< \$1 million)
Latshaw Drilling Company LLC Latshaw Drilling & Exploration Company Inc. (“ <u>Latshaw</u> ”)	Trent B. Latshaw, President Latshaw Drilling Company LLC P.O. Box 691017 Tulsa, Oklahoma 74169	Claim for damages related to unfunded lending commitment (approx. \$18 million)

3. The following are the facts and circumstances in connection with SSB&B’s employment in the above-captioned cases: (a) SSB&B represented Moody’s, IBM and the IBM Trust prior to the Debtors’ above-captioned chapter 11 cases, and was retained by Latshaw specifically with respect to these cases; and (b) each of the Entities separately requested that SSB&B represent them in connection with the Debtors’ above-captioned chapter 11 cases.

4. SSB&B reserves the right to supplement or amend this statement at any time in the future.

5. SSB&B does not perceive any actual or potential conflict of interest with respect to the representation of the Entities in these proceedings.

6. Upon information and belief, SSB&B does not own, nor has it ever owned, any claim whatsoever against the Debtors in these cases, nor equity securities of the Debtors.<sup>1</sup>

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<sup>1</sup> Members and associates of SSB&B, in their individual capacities, may hold claims and/or equity interests in the Debtors.

Dated: New York, New York  
November 10, 2009

SATTERLEE STEPHENS BURKE & BURKE LLP

By: /s/ Christopher R. Belmonte  
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