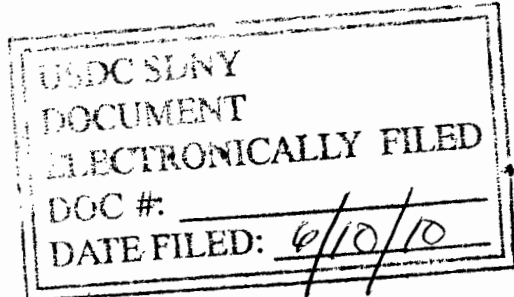


*Stipulation*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

\_\_\_\_\_  
KING COUNTY, WASHINGTON, :  
Individually and on Behalf of All Others :  
Similarly Situated, :  
  
Plaintiff, :  
  
vs. :  
  
IKB DEUTSCHE INDUSTRIEBANK AG, et :  
al., :  
  
Defendants. :

x  
Civil Action No. 1:09-cv-08387-SAS  
CLASS ACTION



\_\_\_\_\_  
IOWA STUDENT LOAN LIQUIDITY :  
CORPORATION, Individually and on Behalf :  
of All Others Similarly Situated, :  
  
Plaintiff, :  
  
vs. :  
  
IKB DEUTSCHE INDUSTRIEBANK AG, et :  
al., :  
  
Defendants. :  
x

Civil Action No. 1:09-cv-08822-SAS  
CLASS ACTION

STIPULATION AND [PROPOSED] ORDER REGARDING AMENDMENT AND  
CONSOLIDATION OF RELATED ACTIONS

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel that plaintiffs may amend and consolidate the operative complaints in this action pursuant to Federal Rule of Civil Procedure 15 and file a First Amended Consolidated Complaint for Violations of New York State Law.

IT IS HEREBY FURTHER STIPULATED AND AGREED that the following related cases shall be consolidated for all purposes, including, but not limited to, discovery, pretrial proceedings and trial proceedings:

Short Case Name	Case Number	Date Filed
<i>King County, Washington v. IKB Deutsche Industriebank AG, et al.</i>	1:09-cv-08387-SAS ECF Case	October 2, 2009
<i>Iowa Student Loan Liquidity Corporation v. IKB Deutsche Industriebank AG, et al.</i>	1:09-cv-08822-SAS ECF Case	October 16, 2009

IT IS HEREBY FURTHER STIPULATED AND AGREED that the consolidated cases shall be identified as: *King County, Washington, et al. v. IKB Deutsche Industriebank AG, et al.*, Master File No. 1:09-cv-08387-SAS, and the files of this action shall be maintained in one file under Case No. 1:09-cv-08387-SAS.

IT IS HEREBY FURTHER STIPULATED AND AGREED that plaintiffs shall file a First Amended Consolidated Complaint for Violations of New York State Law no later than June 10, 2010, which shall be deemed the operative complaint, superseding all complaints filed in any of the actions consolidated hereunder, and that the Rating Agency and IKB Defendants shall have 25 days from the filing of that First Amended Consolidated Complaint to respond, and Mr. Ortseifen shall have the additional time provided by the Court and reflected in the May 18, 2010 hearing transcript, and Mr. Reinke shall have such time as agreed to by the parties and reflected in the stipulation previously submitted.

IT IS HEREBY FURTHER STIPULATED AND AGREED that nothing herein shall limit or in any way preclude any defendant from asserting any and all defenses available to him or it, from opposing any application to certify this action as a class action, or from taking any other position with respect to the First Amended Consolidated Complaint that any defendant may deem to be in his or its best interests.

DATED: June 9, 2010

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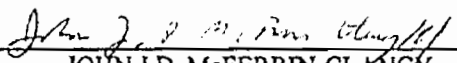
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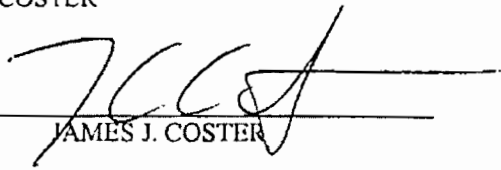
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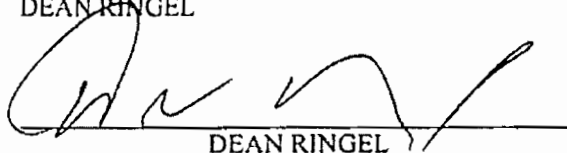
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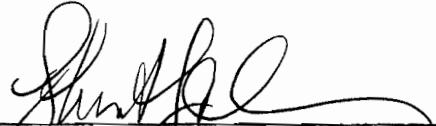
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SO ORDERED.

  
HONORABLE SHIRA A. SCHEINDLIN,  
UNITED STATES DISTRICT JUDGE

June 10, 2010

DECLARATION OF SERVICE BY MAIL AND E-MAIL

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and employed in the City and County of San Francisco, over the age of 18 years, and not a party to or interested party in the within action; that declarant's business address is 100 Pine Street, Suite 2600, San Francisco, California 94111.

2. That on June 9, 2010, declarant served the **STIPULATION AND [PROPOSED] ORDER REGARDING AMENDMENT AND CONSOLIDATION OF RELATED ACTIONS** by depositing a true copy thereof in a United States mailbox at San Francisco, California in a sealed envelope with postage thereon fully prepaid and addressed to the parties listed on the attached Service List. Declarant also served the parties by e-mail.

3. That there is a regular communication by mail between the place of mailing and the places so addressed.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 9, 2010, at San Francisco, California.

  
\_\_\_\_\_  
MARCY MEDEIROS

IKB DEUTSCHE RHINEBRIDGE SIV

Service List - 6/9/2010 (09-0179)

Page 1 of 2

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Service List - 6/9/2010 (09-0179)

Page 2 of 2

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Courtesy Copy:  
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