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June 25, 2014

## VIA ECF AND HAND DELIVERY

The Honorable Lewis A. Kaplan United States District Court Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, NY 10007-1312

Re: In re Weatherford Int'l Sec. Litig., Case No. 11 Civ. 1646 (LAK) (JCF)

Dear Judge Kaplan:

We write on behalf of Settlement Class Representatives, American Federation of Musicians and Employers' Pension Fund and Georgia Firefighters' Pension Fund ("Plaintiffs"), in the above-referenced action.

Following the submission of Plaintiffs' reply papers in support of settlement on June 20, 2014 (ECF Nos. 263 & 264), Plaintiffs discovered two typos in Exhibit P to the Declaration of Eli R. Greenstein (ECF No. 264-16) which is a chart reflecting hypothetical lodestar calculations based on different hourly rates charged for staff attorney time. First, in the second column entitled "Lead Counsel Document Review Hours" the number of hours was inadvertently accompanied by a dollar sign, when it reflects raw hours, not a monetary amount. Second, in the seventh column, the heading "Lead Counsel Lodestar" should read "Local Counsel Lodestar" as Lead Counsel's lodestar is already reflected in the preceding column. While we believe these typos may have been self-evident from the other information in the chart, out of an abundance of caution, we are filing a corrected Exhibit P.

We have attached the [Corrected] Exhibit P to this letter for the Court's convenience and also filed this letter and the corrected Exhibit P via the Court's ECF system.

Respectfully submitted,

Eli R. Greenstein, Esq.

Enclosure

cc: David Kessler, Esq.

Curtis V. Trinko, Esq. (Liaison Counsel) Peter A. Wald, Esq. (Defendants' Counsel)

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## [CORRECTED] EXHIBIT P

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## EXHIBIT P - HYPOTHETICAL ADJUSTED STAFF ATTORNEY HOURLY RATE CHART

	Lead Counsel Document Review Hours	Lead Counsel Document Review Lodestar	Lead Counsel Remaining Hours	Lead Counsel Remaining Lodestar	Lead Counsel Total Lodestar	Local Counsel Lodestar	Total Lodestar	Requested Fee	Multiplier
Actual Rates (\$375-395)	5,487.55	\$2,122,340	24,449.71	\$10,598,751	\$12,721,091	\$191,618	\$12,912,709	\$12,600,000	0.98
\$350 per hour	5,487.55	\$1,920,643	24,449.71	\$10,598,751	\$12,519,393	\$191,618	\$12,711,011	\$12,600,000	0.99
\$300 per hour	5,487.55	\$1,646,265	24,449.71	\$10,598,751	\$12,245,016	\$191,618	\$12,436,633	\$12,600,000	1.01
\$250 per hour	5,487.55	\$1,371,888	24,449.71	\$10,598,751	\$11,970,638	\$191,618	\$12,162,256	\$12,600,000	1.04
\$200 per hour	5,487.55	\$1,097,510	24,449.71	\$10,598,751	\$11,696,261	\$191,618	\$11,887,878	\$12,600,000	1.06
\$0 per hour	5,487.55	\$0	24,449.71	\$10,598,751	\$10,598,751	\$191,618	\$10,790,368	\$12,600,000	1.17