

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE: AMARANTH NATURAL GAS
COMMODITIES LITIGATION

MASTER FILE
NO. 07-CV-6377 (SAS)

This Document Relates to: ALL ACTIONS
-----X

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the declaration of Christopher Lovell, Esq. and the Stipulation and Agreement of Settlement (“Settlement”), Plaintiffs, by and through their undersigned counsel, will respectfully move this Court, before the Honorable Shira A. Scheindlin, United States District Judge, at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York, on such day and at such time designated by the Court, for entry of the [Proposed] Scheduling Order that, among other things: (1) finds the Settlement to be sufficiently fair, reasonable, and adequate to warrant dissemination of notice to the Class; (2) certifies the Class for settlement purposes; (3) appoints Lovell Stewart Halebian Jacobson LLP, Lowey Dannenberg Cohen & Hart and Louis F. Burke P.C. as Class counsel; (4) finds the program of notice to be the best practicable notice under the circumstances; (5) approves the forms of the mailed and published notice of the Settlement; and (6) sets a schedule leading to the Court’s consideration of final approval of the Settlement, including the date, time and place for a hearing to consider the fairness, reasonableness and adequacy of the Settlement.

Dated: New York, New York
December 27, 2011

Respectfully submitted,

/s/ Christopher Lovell

Christopher Lovell

Christopher M. McGrath

LOVELL STEWART HALEBIAN JACOBSON LLP

61 Broadway, Suite 501

New York, New York 10006

Telephone: (212) 608-1900

Facsimile: (212) 719-4775

Vincent Briganti

Geoffrey Horn

LOWEY DANNENBERG COHEN

& HART, P.C.

White Plains Plaza

1 North Broadway, 5th Floor

White Plains, New York 10601

Telephone: (914) 733-7221

Louis F. Burke

LOUIS F. BURKE P.C.

460 Park Avenue, 21st Floor

New York, New York 10022

Telephone: (212) 682-1700

Lead Counsel for Plaintiffs and the Class