

RECEIVED - CLERK
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION
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MICHAEL FEDER, Individually And On
Behalf of Himself and All Others Similarly
Situated,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION, JAMES E. DALEY, and
RICHARD H. BROWN,

Defendants.

MAYER HORWITZ, and BARBARA
HORWITZ, On Behalf of Themselves And
All Others Similarly Situated,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION, RICHARD H. BROWN,
PAUL J. CHIAPPARONE, and JAMES E.
DALEY,

Defendants.

EASTERN DISTRICT
OF TEXAS
BEAUMONT DIVISION
Case No. 02-CV-207
(Folsom, David)

SECURITIES CLASS ACTION

[PROPOSED] ORDER APPOINTING
NEW JERSEY AS LEAD PLAINTIFF
PURSUANT TO §21D(a)(3)(B) OF THE
SECURITIES EXCHANGE ACT OF 1934
AND APPROVING PROPOSED LEAD
PLAINTIFF'S CHOICE OF COUNSEL

Case No. 02-CV-232
(Ward, T. John)

GREGORY R. MILLER, On Behalf Of
Himself And All Others Similarly Situated,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION, RICHARD H. BROWN,
PAUL J. CHIAPPARONE, and JAMES E.
DALEY,

Defendants.

Case No. 02-CV-233
(Folsom, David)

CRAIG THOMPSON, Individually And On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION, RICHARD H. BROWN,
and JAMES E. DALEY,

Defendants.

Case No. 02-CV-248
(Folsom, David)

BARRY FAMILY LP, On Behalf of
Themselves and All Others Similarly
Situated,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION, RICHARD H. BROWN,
and JAMES E. DALEY,

Defendants.

Case No. 02-CV-300
(Davis, Leonard)

JOHN BRAUN and MARC ABRAMS, On
Behalf of Themselves and All Others
Similarly Situated,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION, RICHARD H. BROWN,
PAUL CHIAPPARONE, and JAMES E.
DALEY,

Defendants.

Case No. 02-CV-304
(Davis, Leonard)

STEPHEN M. HARNIK, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION, RICHARD H. BROWN,
and JAMES E. DALEY,

Defendants.

Case No. 02-CV-308
(Brown, Paul)

BRIDGEWATER PARTNERS, On Behalf
of Themselves and All Others Similarly
Situated,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION, RICHARD H. BROWN,
and JAMES E. DALEY,

Defendants.

Case No. 02-CV-310
(Davis, Leonard)

GLEN VANDERWARTER, Individually
And On Behalf of All Others Similarly
Situated,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION, RICHARD H. BROWN,
and JAMES E. DALEY,

Defendants.

Case No. 02-CV-314
(Brown, Paul)

LIEF THORNE-THOMSEN, Individually
And On Behalf of All Others Similarly
Situated,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION, RICHARD H. BROWN,
PAUL J. CHIAPPARONE, and JAMES E.
DALEY,

Defendants.

Case No. 02-CV-321
(Davis, Leonard)

JOHN J. BRITT, JR., Individually And On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION, RICHARD H. BROWN,
PAUL J. CHIAPPARONE, and JAMES E.
DALEY,

Defendants.

Case No. 02-CV-322
(Brown, Paul)

STANLEY SVED, On Behalf Of Himself
And All Others Similarly Situated,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION, RICHARD H. BROWN,
PAUL J. CHIAPPARONE, and JAMES E.
DALEY,

Defendants.

Case No. 02-CV-323
(Brown, Paul)

HADDON ZIA, On Behalf of Himself And
All Others Similarly Situated,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION, RICHARD H. BROWN,
PAUL J. CHIAPPARONE, and JAMES E.
DALEY,

Defendants.

Case No. 02-CV-329
(Schell, Richard A.)

WILLIAM J. KLUEMPER, Individually
And On Behalf of All Others Similarly
Situating,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION, RICHARD H. BROWN,
and JAMES E. DALEY,

Defendants.

Case No. 02-CV-331
(Brown, Paul)

JOHN McLOUGHLIN, On Behalf Of
Himself And All Others Similarly Situated,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION, RICHARD H. BROWN,
PAUL J. CHIAPPARONE, and JAMES E.
DALEY,

Defendants.

Case No. 02-CV-335
(Davis, Leonard)

STANTON DISCOUNT PHARMACY, On
Behalf of Itself And All Others Similarly
Situated,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION, RICHARD H. BROWN,
and JAMES E. DALEY,

Defendants.

Case No. 02-CV-336
(Brown, Paul)

JENNIFER CHANA FINK, On Behalf of
Herself and All Others Similarly Situated,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION, RICHARD H. BROWN,
and JAMES E. DALEY,

Defendants.

Case No. 02-CV-365
(Davis, Leonard)

Upon consideration of the motion of the Department of the Treasury of the State of New Jersey and its Division of Investment, on behalf of Common Pension Fund A ("New Jersey") for appointment as Lead Plaintiff and approval of its selection of counsel, the Memorandum of Points and Authorities, and Declaration of Robert S. Gans in support thereof, and for good cause shown,

IT IS HEREBY ORDERED THAT:

1. The Motion by New Jersey is GRANTED;
2. New Jersey is APPOINTED to serve as Lead Plaintiff, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), in the above-captioned actions and all related actions subsequently transferred and consolidated herewith;
3. The selection of counsel by New Jersey is APPROVED and the law firms of Bernstein Litowitz Berger & Grossmann LLP and Greenbaum, Rowe, Smith, Ravin, Davis & Himmel LLP are hereby APPOINTED as Lead Counsel for the Class and the law firm of Nickens, Keeton, Lawless, Farrell & Flack, L.L.P. is APPOINTED Local Counsel.

IT IS SO ORDERED.

Dated: _____, 2002

HONORABLE DAVID FOLSOM
United States District Court Judge