

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JACK REYNOLDS, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

REPSOL YPF, S.A., et al.,

Defendants.

06 Civ. 733 (LEAD)
ECF Case

RICHARD MURAD, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

REPSOL YPF, S.A., et al.,

Defendants.

06 Civ. 1014
ECF Case

**NOTICE OF MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT**

PLEASE TAKE NOTICE that on August 23, 2007, Lead Plaintiffs Jack Reynolds, Charles A. Kubo and John L. Brooks, III, on behalf of themselves and all members of the proposed Settlement Class, by and through their counsel, will move for preliminary approval of the Settlement of the above-captioned action pursuant to the terms of the Stipulation and Agreement of Settlement dated June 4, 2007, before the Honorable Deborah A. Batts, United States District Judge, United States Courthouse, 500 Pearl St., Room 2510, New York, NY, 10007.

DATED: August 23, 2007

**LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP**

_____/s/ Samuel H. Rudman_____
Samuel H. Rudman (SR-7957)
David A. Rosenfeld (DR-7564)
58 South Service Road, Suite 200
Melville, NY 11747
Tel.: (631) 367-7100
Fax: (631) 367-1173

Ellen Gusikoff Stewart
**LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP**
655 West Broadway, Suite 1900
San Diego, CA 92101

Michael K. Yarnoff
John A. Kehoe
Kay E. Sickles
**SCHIFFRIN BARROWAY TOPAZ
& KESSLER, LLP**
280 King of Prussia Road
Radnor, PA 19087
Tel.: (610) 667-7706
Fax: (610) 667-7056

*Counsel for Lead Plaintiffs
and the Settlement Class*