

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**In re NATIONAL CITY CORPORATION ) Master File No: 08 CV 70000  
SECURITIES, DERIVATIVE & )  
ERISA LITIGATION ) JUDGE PATRICIA A. GAUGHAN  
)  
This document is applicable to: )  
The Securities Case )**

**STIPULATION AND PROPOSED ORDER**

Lead plaintiff Thomas P. Dinapoli, Comptroller of the State of New York, as administrative head of the New York State and Local Retirement Systems and as trustee of the New York State Common Retirement Fund, and Defendants, by and through their respective counsel, hereby stipulate and agree that:

1. Lead Plaintiff shall file a Consolidated Class Action Complaint (the “Consolidated Complaint”) within sixty (60) days of entry of this order.
2. Defendants shall have sixty (60) days in which to answer or otherwise respond to the Consolidated Complaint.
3. If Defendants move with respect to the Consolidated Complaint, Lead Plaintiff shall file its opposition to Defendants’ motion within sixty (60) days.
4. Defendants shall file their reply within thirty (30) days of Lead Plaintiffs’ opposition.

Dated: April 11, 2008

Respectfully submitted,

s/ Ira M. Press

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*Counsel for Defendants*

**It is so ordered.**

/s/ Patricia A. Gaughan

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Judge Patricia A. Gaughan

United States District Judge