

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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IN RE MARSH & MCLENNAN COMPANIES, INC.  
SECURITIES LITIGATION

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:  
: CIVIL ACTION  
: NO: 04-CV-08144 (SWK)  
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**DECLARATION OF MARY S. THOMAS IN SUPPORT OF  
LEAD PLAINTIFFS' OBJECTIONS TO SPECIAL MASTER'S ORDER ON  
DEFENDANTS MARSH & MCLENNAN COMPANIES, INC.'S AND MARSH, INC.'S  
MOTION TO COMPEL PLAINTIFFS TO PRODUCE DOCUMENTS RESPONSIVE TO  
DEFENDANTS' FIRST AND SECOND DOCUMENT REQUESTS**

I, Mary S. Thomas, hereby declare as follows:

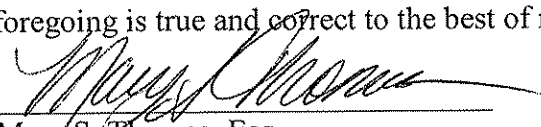
1. I am an attorney with the law firm of Grant & Eisenhofer P.A., Co-Lead Counsel for the Class in the above-captioned matter.

2. I submit this declaration in support of Lead Plaintiffs' Objections to the Special Master's Order on Defendants Marsh & McLennan Companies, Inc.'s and Marsh, Inc.'s Motion to Compel Plaintiffs to Produce Documents Responsive to Defendants' First and Second Document Requests.

3. Attached hereto are true and correct copies of the following documents:
- Exhibit 1: Marsh Defendants' Motion to Compel dated February 19, 2008
- Exhibit 2: Lead Plaintiffs' Opposition to the Motion to Compel dated March 21, 2008
- Exhibit 3: Marsh Defendants' Reply Brief dated April 14, 2008
- Exhibit 4: Letter to Lead Plaintiffs dated January 24, 2008
- Exhibit 5: Transcript of Telephonic Hearing dated June 13, 2008
- Exhibit 6: Select Monthly Reports of BWC outside investment managers, produced by BWC
- Exhibit 7: Letter to Special Master Parcher dated June 12, 2008

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 17th day of June, 2008.

  
Mary S. Thomas, Esq.  
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