

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re UBS AUCTION RATE SECURITIES
LITIGATION

This Document Related To:
All Actions

Master File No. 08-CV-02967-LMM

RANDOLPH BONNIST, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

V.

Case No. 08-CV-04352-LMM

UBS AG, UBS SECURITIES LLC and UBS
FINANCIAL SERVICES, INC.

Defendant.

**DECLARATION OF AARON M. SHEANIN IN SUPPORT OF THE
CHANDLER GROUP'S MOTION FOR CONSOLIDATION OF ACTIONS,
APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF
SELECTION OF COUNSEL**

I, Aaron M. Sheanin, under penalty of perjury, hereby declare:

1. I am a partner of Girard Gibbs LLP and am admitted to practice *pro hac vice* in the above-captioned action. I submit this declaration in support of the Chandler Group's Motion For Consolidation Of Actions, Appointment As Lead Plaintiff, And Approval Of Selection Of Counsel.

2. Attached hereto as Exhibit A is a true and correct copy of the Declaration of David Chandler In Support of the Motion of the Chandler Group for Consolidation of Actions, Appointment as Lead Plaintiff, and Approval of Selection of Counsel.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 19th day of June, 2008 at San Francisco, California.

/s/ Aaron M. Sheanin
Aaron M. Sheanin

CERTIFICATE OF SERVICE

I, Jonathan K. Levine, hereby certify that on June 19, 2008, I caused the following document(s) to be filed electronically with the United States District Court for the Southern District of New York through the Court's mandated ECF service:

1. DECLARATION OF AARON M. SHEANIN IN SUPPORT OF THE CHANDLER GROUP'S MOTION FOR CONSOLIDATION OF ACTIONS, APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF SELECTION OF COUNSEL

Counsel of record are required by the Court to be registered e-filers, and as such are automatically e-served with a copy of the document(s) upon confirmation of e-filing.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of June, 2008 at San Francisco, California.

/S/ Jonathan K. Levine

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re UBS AUCTION RATE SECURITIES
LITIGATION

) Master File No. 08-CV-02967

This Document Related To:
All Actions

RANDOLPH BONNIST, Individually and On
Behalf of All Others Similarly Situated,

) Case No. 08-CV-04352 (UA)

Plaintiff,

- against -

UBS AG, UBS SECURITIES LLC and UBS
FINANCIAL SERVICES, INC.

Defendant.

**DECLARATION OF DAVID CHANDLER
IN SUPPORT OF THE MOTION OF THE CHANDLER GROUP FOR
CONSOLIDATION OF ACTIONS, APPOINTMENT AS LEAD PLAINTIFF, AND
APPROVAL OF SELECTION OF COUNSEL**

I, David Chandler, under penalty of perjury, hereby declare:

1. I am one of the named plaintiffs in *Chandler v. UBS AG, et al.*, 08-cv-02967 (S.D.N.Y.), and a member of the Chandler Group, which has moved for appointment as Lead Plaintiff in this case. I make this declaration based on my personal knowledge and, if called to testify to the contents thereof, could and would competently do so.

2. The Chandler Group consists of Robert Bee, Dr. Edward Taras, Larry S. Watanabe, David Ghiz, Dr. M. Richard Goldberg, Shelly Chandler and me. Each member of the Chandler Group purchased auction rate securities from UBS during the Class Period. Since the auction rate securities market collapsed in February 2008, we have been unable to sell our securities. I understand that the members of the Chandler Group had more than \$31 million in frozen securities when the auction market collapsed. While some of our securities have been redeemed by their issuers since that time, the bulk remains illiquid.

3. My wife, Shelly Chandler and I authorized Girard Gibbs LLP and associated counsel to file the *Chandler* class action in March 2008 and to ask the Court to appoint us as Lead Plaintiff, either individually or as part of a group. The other members of the Chandler Group also authorized counsel to seek appointment as Lead Plaintiff in this case.

4. The members of the Chandler Group have participated in a telephone conference, in which we discussed the joint prosecution of the claims asserted by purchasers of auction rate securities from UBS. The members of the Chandler Group—business professionals who have had substantial assets frozen in auction rate securities—will provide diversity of experience and bring balance to the demographics of the Lead Plaintiff appointment. Based on my discussions

with Mr. Bee, Dr. Taras, Mr. Watanabe, Mr. Ghiz, Dr. Goldberg and my wife, I believe that the Class will be well served if the Court appoints the Chandler Group to serve as Lead Plaintiff.

5. The members of the Chandler Group have established procedures for communicating regularly with each other, and we share common views in regards to the goals and management of the litigation. The Chandler Group intends to hold periodic conferences with counsel to be apprised of case developments and to provide direction to counsel on matters of importance to the litigation. The Chandler Group is committed to resolving significant strategic decisions on the basis of consensus.

6. Along with the other members of the Chandler Group, I will actively oversee the management of the litigation and the performance of counsel. To the extent necessary, I intend to confer with any other Lead Plaintiff appointed by the Court to ensure that the litigation is actively and responsibly prosecuted. I believe that active monitoring of the litigation is a prime factor in eliminating inefficiency and potentially duplicative efforts of counsel.

7. For all the reasons expressed, I believe that the Chandler Group's motion for appointment as Lead Plaintiff and its selection of counsel should be approved.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 14th day of June, 2008 at San Diego, California.

David Chandler

David Chandler