

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SAM LIPSON, on behalf of himself and all others
similarly situated, Plaintiff,

- against -

MARTIN J. SIMON, et al., Defendants.

CV 98 4573 (TCP)

RELEASE FORM

**IMPORTANT: TO BE SUBMITTED ONLY BY SHAREHOLDERS WHO
SUBMITTED A TIMELY AND VALID PROOF OF CLAIM IN CONNECTION
WITH THE PRIOR MARCH 20, 2003 STIPULATION OF PARTIAL SETTLEMENT**

Claim No: «clm_no»

«name1»

«name2»

«name3»

«addr1»

«addr2»

«city», «state» «zip5»

Correct the Name, Address and Tax ID Number
(If different from information at left)

Social Security or Tax Identification Number

«tax_id»

Claimant on his/her/its behalf and on behalf of his/her/its respective past or present, direct or indirect, [corporate] parents, predecessors, successors, divisions, subsidiaries, affiliates, shareholders, directors, officers, agents, partners, heirs, executors, administrators, assigns, grantees, and representatives (collectively, the "Plaintiff Releasers") do hereby forever release and absolutely and forever discharge Defendant McGladrey & Pullen, LLP ("McGladrey") and any and all of its present or former directors, partners, principals, officers, employees, agents, trustees, parents, subsidiaries, affiliates, divisions, insurers or any of their respective predecessors or successor partners, or McGladrey's heirs, executors, administrators, successors, or assigns (hereinafter "McGladrey Releasees") of and from any and all actions, causes of action, suits, obligations, claims, debts, demands, agreements, promises, liabilities, controversies, costs, and expenses whatsoever, whether based on any federal or state law or right of action foreseen or unforeseen, matured or unmatured, known or unknown, accrued or not accrued, which the Plaintiff Releasers had, has, could or might have had, or may hereafter have against the McGladrey Releasees, or any of them, for, by reason of, or arising from any fact, matter, transaction, occurrence, or event, alleged or which might have been alleged in the First Amended Complaint or any other pleading or paper filed in the Action.

IMPORTANT: IF THIS RELEASE IS BEING SUBMITTED ON BEHALF OF JOINT PURCHASERS, OR IS BEING SUBMITTED BY LEGAL REPRESENTATIVES ON BEHALF OF A PURCHASER, IT MUST BE SIGNED BY ALL JOINT PURCHASERS OR LEGAL REPRESENTATIVES.

I certify under penalty of perjury that I have all of the requisite power and authority to execute this Release.

(Signature)

Date: _____

(Signature)

Date: _____

Telephone Number(s) where Claimant(s)
may be reached for clarification of claim: _____