



**IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE**

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IN RE EL PASO CORPORATION	)	
SHAREHOLDER LITIGATION	)	Consolidated
	)	C.A. No. 6949-CS
	)	
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**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF PROPOSED SETTLEMENT AND PLAN OF ALLOCATION, CERTIFICATION OF THE CLASS, AND AN AWARD OF ATTORNEYS' FEES**

Co-Lead Plaintiffs Pompano Beach Police & Firefighters' Retirement System, Pipefitters Local Union #537 Trust Funds, Saratoga Advantage Trust Energy & Basic Materials Portfolio, and Saratoga Advantage Trust Mid Capitalization Portfolio (collectively, "Plaintiffs") respectfully move this Court for an Order approving the proposed settlement and plan of allocation, certifying the class, and awarding attorneys' fees in the amount of \$26 million, inclusive of expenses. The grounds for this motion are set forth in the accompanying Brief In Support Of Plaintiffs' Motion For Final Approval Of The Proposed Settlement And Plan Of Allocation, Certification Of The Class, And An Award Of Attorneys' Fees.

Dated: November 8, 2012

Respectfully submitted,

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