

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

THE DEPARTMENT OF THE TREASURY OF
THE STATE OF NEW JERSEY AND ITS
DIVISION OF INVESTMENT, on behalf of itself
and all others similarly situated,

Plaintiff,

v.

CLIFFS NATURAL RESOURCES INC.,
JOSEPH CARRABBA, LAURIE BRLAS,
TERRY PARADIE, and DAVID B. BLAKE,

Defendants.

Case No. 1:14-cv-1031

Judge Dan Aaron Polster

Magistrate Judge Thomas M. Parker

**NOTICE OF LEAD PLAINTIFF'S MOTION
TO REQUIRE AN APPEAL BOND**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rule of Appellate Procedure 7 and upon (i) the Memorandum of Law in Support of Lead Plaintiff's Motion to Require an Appeal Bond; (ii) the Declaration of Eric Schachter in Support of Lead Plaintiff's Motion for an Appeal Bond; and (iii) all other papers and proceedings herein, Lead Plaintiff, The Department of the Treasury of the State of New Jersey and its Division of Investment, on behalf of itself and the Settlement Class, will and hereby does move this Court, before the Honorable Dan Aaron Polster, for entry of an order requiring Objector-Appellant Jeff M. Brown to post an appeal bond under Federal Rule of Appellate Procedure 7.

The proposed order is attached hereto as Exhibit 1.

Dated: November 3, 2016

Respectfully submitted,

/s/ Scott D. Simpkins

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#1007550

EXHIBIT 1

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[PROPOSED] ORDER REQUIRING POSTING OF AN APPEAL BOND

WHEREAS, Lead Plaintiff has moved this Court to require that Objector-Appellant Jeff M. Brown post an appeal bond pursuant to Fed. R. App. P. 7, and the Court having read the parties' papers, and good cause appearing,

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. The motion to require Objector-Appellant Jeff M. Brown to post a bond pursuant to Fed. R. App. P. 7 is granted; and
2. Objector Jeff M. Brown shall post a bond in the amount of \$45,000.00 pursuant to Fed. R. App. P. 7 with seven (7) calendar days of the date of entry of this Order.

SO ORDERED this _____ day of _____, 2016.

The Honorable Dan Aaron Polster
United States District Judge

CERTIFICATE OF SERVICE

A copy of the foregoing was filed electronically this 3rd day of November 2016. Notice of this filing will be sent to all parties of record by operation of the Court's electronic filing system. Parties of record may access this filing through the Court's system.

A copy of the foregoing was also served this 3rd day of November 2016 on the following individual by email and FedEx overnight delivery service:

Jeff M. Brown
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/s/ Scott D. Simpkins

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