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BY HAND DELIVERY

Honorable Richard M. Berman
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 650
New York, NY 10007

Re: *In re Nortel Networks Corp. Sec. Litig., 01 civ 1855 (RMB) ("Nortel I")*

Dear Judge Berman:

I write to advise the Court regarding an additional, untimely, objection received by the Claims Administrator.

I also wish to advise the Court that the third and last Canadian settlement hearing was held in Vancouver on November 27, 2006. Justice Groberman reserved decision.

With respect to the new objection, we submit that the objection is too late, is without merit and should be denied.

As the Court is aware, the deadline for submitting objections was September 19, 2006. All objections previously received were submitted to the Court for consideration.¹

Enclosed is a copy of a Supplemental Affidavit Relating to Additional Late Exclusions and Objection (Fourth Report of Exclusions and Objections) from the Claims Administrator (the "Fourth GCG Report"). The original Fourth GCG Report is being filed with the Clerks office. Included in the Fourth GCG Report as Exhibit A is an objection from John D. Simon. Mr. Simon objects to the fact that the Class Period ended on February 15, 2001 and does not include his transaction made on February 16, 2001.

Mr. Simon asserts that, in addition to having written (sold) a put option on Nortel common stock during the Class Period, he wrote (sold) a put option on February 16, 2001, the day after the end of the Class Period. Mr. Simon would have the Court extend the Class Period to include his February 16, 2001 transaction.

¹ See October 3, 2006 Affidavit of David A. Isaac Regarding Exclusion Requests and Objections Received for Nortel I (the "Initial GCG Report"), October 23, 2006 Supplemental Affidavit of David C. Isaac Relating to Late Exclusion Requests and Late Objections (the "Second GCG Report"), October 25, 2006 Affidavit of Randi Alarcon Collatta Relating to additional Responses to Objections Filed, and November 1, 2006 Supplemental Affidavit of Randi Alarcon Collatta Relating to additional Exclusions and Objections Filed.

