



Electronic Filing Instructions – Mills Corporation Securities Litigation

I. Important Notes – PLEASE READ

- Electronic claim submissions apply to institutions filing on behalf of multiple client or proprietary accounts.
- Electronic claim submissions **MUST** be accompanied by all documentation requirements outlined in section III of these instructions.
- For common stock only, the beginning holding positions are as of the close of trading on 2/26/2001.
 - The preferred stocks **DO NOT** have a beginning holding position as they began trading within the Class Period.
- Provide all purchases during the following trade periods for each security:
 - Common Stock: 2/27/2001 through and including 8/10/2006
 - Preferred Stock (Series B): 10/9/2002 through and including 8/10/2006
 - Preferred Stock (Series C): 12/17/2002 through and including 8/10/2006
 - Preferred Stock (Series E): 5/5/2003 through and including 8/10/2006
 - Preferred Stock (Series G): 5/17/2005 through and including 8/10/2006
- Provide all sales during the following trade periods for each security:
 - Common Stock: 2/27/2001 through and including 11/8/2006
 - Preferred Stock (Series B): 10/9/2002 through and including 11/8/2006
 - Preferred Stock (Series C): 12/17/2002 through and including 11/8/2006
 - Preferred Stock (Series E): 5/5/2003 through and including 11/8/2006
 - Preferred Stock (Series G): 5/17/2005 through and including 11/8/2006
- For all securities, the unsold holdings are as of the close of trading on 8/10/2006 **AND** 11/8/2006 (holding date **MUST** be referenced in column N).

II. Methods of Submission

Electronic files will not be deemed properly submitted unless the Claims Administrator issues an email after processing your file with your claim numbers and respective account information. Do not assume that your file has been received or processed until you receive this email. If you do not receive such an email within 10 days of your submission, you should contact the electronic filing department at eClaim@gardencitygroup.com to inquire about your file and confirm it was received and acceptable.

The following methods are available for submitting your electronic claims:

1. Internet – GCG ICE (www.gcgice.com)

- GCG ICE™ is GCG's new secure and user-friendly website designed to meet the claim filing needs of institutional investors in securities class actions. Using GCG ICE™, registered users have the ability to upload their electronic claim submissions directly and securely to GCG and the benefit of being able to view the history and status of these submissions 24 hours a day, 7 days a week. The history and status functionality features access to claim numbers and specific claim rejection reasons, with instructions on how to fix rejected claims.
- Please visit www.gcgice.com to register today so you can benefit from this service in this litigation and all future submissions.

2. Email

- You may email your electronic claim submission to eClaim@gardencitygroup.com.
- If you choose to email your file, you MUST also attach all documentation requirements in the email as .pdf documents or equivalent.

3. Mail

- You may send your electronic claim submission in the mail on a disk or CD along with all other documentation requirements. Please use the P.O. Box address on top of page 1 of the Proof of Claim and Release claim form and add "Attn: Electronic Filing Department". If you need to send your submission via Federal Express or UPS, you may use the below street address:

Mills Corporation Securities Litigation
c/o The Garden City Group, Inc.
Attn: Electronic Filing Department
5151 Blazer Parkway, Suite A
Dublin, OH 43017

III. Documentation Requirements

The documentation requirements outlined below must be submitted with your electronic file. Your electronic claims will not be considered valid until all documentation requirements are received. Please note that one single document may meet more than one requirement.

1. One Signed Proof of Claim and Release

- You must complete the claimant identification page (Section A – page 2) and signature page (Section D – page 11) of a single Proof of Claim and Release form, which will serve as an "umbrella" or "master" claim form for all accounts on your electronic file.
- The claim form must be signed by an authorized signatory and state the capacity (job title) of the signatory.
- You may reference the term "Various Accts" for the beneficial owner name if you are filing on behalf of multiple accounts or clients.

2. Signature Verification Document

- You must provide a document verifying that the individual who signed the claim form and any supplemental documents is authorized to sign on behalf of his/her company. Some common types of documents that fulfill this requirement include the following:
 - Copy of company's By-Laws, including signature page(s)
 - Copy of company's Corporate Resolution, including signature page(s)
 - Notarized Affidavit signed by an officer of the institution clearly granting a specific individual(s) authorization or confirming his/her own authority to sign on behalf of his/her company.

3. Data Verification Document(s)

- You must provide a document(s) confirming the number of distinct accounts and data lines on your file as well as documentation supporting the truth and accuracy of transactions provided on your electronic file. Some common types of documents that fulfill this requirement include the following:
 - Broker confirmations
 - Monthly statements

- Notarized affidavit or signed letter on firm letterhead attesting to the truth and accuracy of the information in your file. It must be executed by an authorized signatory and specify the capacity and contact information of the signatory.

4. Authorization Document (if filing on behalf of client or customer accounts)

- You must provide a document verifying that you are authorized to file and sign claims on behalf of your clients or beneficial owners. Some common types of documents that fulfill this requirement include the following:
 - Power of Attorney
 - Service Agreement
 - Signed letter on client's company letterhead specifically granting your company authority to file/sign claims on their behalf.
 - Notarized affidavit or signed letter on your company's letterhead confirming your authority to file and sign claims on behalf of your clients. It must be executed by an officer of the company and reference the capacity and contact information of the signatory.

IV. Required Filing Format

General Instructions

- Files may be submitted as a fixed-length text file or an Excel spreadsheet
- All fields in the below format must be included on your file
- Any fields that do not apply to your file must be left blank (do not delete any fields)
- Your file must include one header row with column headings
- Your file must be sorted in the following order:
 - account number
 - security identifier
 - transaction type
- Do not exceed maximum character lengths for any field
- Do not provide any blank rows on your file
- Any files not in accordance with the below format are subject to rejection

- For Excel spreadsheets:
 - Whenever possible, your file should be limited to one tab with all account and transactional data
 - The “Length” column in the below format specifies the maximum number of characters for each Excel field

Required File Layout

Col	Field	Start Position	Length	Notes
A	Company Name	1	40	Name of Company for Mailing of Checks (see Address Notes below) <ul style="list-style-type: none"> • <u>Include</u> a “c/o” before your company name if you require checks made out to the beneficial owner c/o your company.
B	Address 1	41	40	Address1 Information for Mailing of Checks (see Address Notes below)
C	Address 2	81	40	Address2 Information for Mailing of Checks (see Address Notes below)
D	City	121	30	City for Mailing of Checks (see Address Notes below)
E	State	151	2	2 Character State Abbreviation for Mailing of Checks (see Address Notes below)
F	Zip5	153	5	5 Digit Zip for Mailing of Checks (see Address Notes below)
G	Zip4	158	4	4 Digit Zip for Mailing of Checks (see Address Notes below)
H	Country Code	162	2	2 character Country abbreviation (only for foreign addresses)
I	Customer Acct Name	164	40	Name of Account / Beneficial Owner
J	Customer Acct Number	204	30	Account Number
K	SSN or Tax ID Number	234	4	Format 9999 Last 4 digits of Social Security Number or Tax ID Number (leave column blank for foreign entities); <u>NO</u> Dashes; <u>NO</u> Spaces
L	Security Identifier Number	238	14	CUSIP, ISIN, or SEDOL Number of the Security (except for options). <u>IF OPTIONS ARE ELIGIBLE:</u> OC = Call Option OP = Put Option
M	Transaction Type	252	2	B = Beginning Holdings P = Purchase (includes purchases to cover short sales) S = Sale (includes short sales) U = Shares held as of 8/10/06 or 11/8/06 (see note) R = Free Receipt / Transfer In of Shares D = Free Deliver / Transfer Out of Shares <u>Note:</u> When inputting unsold holdings, the trade date column <u>must</u> indicate the holding date (8/10/2006 OR 11/8/2006), and the price per share and net amount columns <u>must</u> be left blank.
N	Trade Date	254	10	Trade date in MM/DD/YYYY format (including foreign entities)
O	Quantity	264	20	Format 9999999999999999.0000 Number of shares associated with this transaction (this value can <u>ONLY</u> be negative for short beginning or ending holdings positions and must be formatted with a negative symbol such as -999999999999.0000); <u>NO</u> commas (,); Enter Decimal Point and 4 positions after the decimal point;
P	Price Per Share	284	20	Format 9999999999999999.0000

				Price of each Share <u>NO</u> commas (,); <u>NO</u> Currency Symbols (\$, €, £, etc); Enter Decimal Point and 4 positions after the decimal point; <ul style="list-style-type: none"> This column should be blank <u>ONLY</u> when providing beginning and/or ending holdings or shares received from a merger.
Q	Total Purchase / Sale Price	304	20	Format 9999999999999999.0000 Total value of the transaction (excluding commissions); <u>NO</u> Commas (,); <u>NO</u> Currency Symbols (\$, €, £, etc); Enter Decimal Point and 4 positions after the decimal point; <ul style="list-style-type: none"> This column should be blank <u>ONLY</u> when providing beginning and/or ending holdings or shares received from a merger.
R	Currency Type	324	3	Type of currency associated to transaction (USD, EUR, GBP, etc.)
S	Exercise / Assign / Expiration Flag	327	1	A = Assigned, E = Exercised, X = Expired <ul style="list-style-type: none"> This column <u>must</u> be used if: <ul style="list-style-type: none"> Common stock transaction is the result of the exercise or assignment of an option; or Purchase/sale to open of an option was later exercised, assigned, or expired.
T	Exercise / Assign Date – only applies to option transactions	328	10	ONLY APPLIES TO OPTION TRANSACTIONS (IF ELIGIBLE) The date that the call or put option was exercised or assigned <ul style="list-style-type: none"> Date in MM/DD/YYYY format (including foreign entities) This column <u>must</u> be populated for option transactions when A or E is in column S
U	Option/Common Stock Links (for exercise and assignments)	338	6	ONLY APPLIES TO OPTION TRANSACTIONS (IF ELIGIBLE) This column should be used to link your specific common stock transactions and options transactions that relate to exercise/assignments. Please use a “1” on both transactions for your first option/common stock match-up and continue in sequential order on all other match-ups (1, 2 ,3 ,4, etc.)
V	Option Strike Price	344	5	ONLY APPLIES TO OPTION TRANSACTIONS (IF ELIGIBLE) Format 999.9 This column <u>must</u> reference the strike price of the call/put option identified in column L.
W	Expiration Month and Year	349	10	ONLY APPLIES TO OPTION TRANSACTIONS (IF ELIGIBLE) This column <u>must</u> reference the expiration date of the call/put option identified in column L but will only display month and year.
X	Additional Information – SECURITY CODE	353	4	CS = Common Stock B = Series B Preferred Stock C = Series C Preferred Stock E = Series E Preferred Stock G = Series G Preferred Stock

V. Electronic Filing Notes

Addresses

- Claims and checks (when eligible) will be created based on the account and address information provided on your electronic file.
- If you require checks to be made out directly to the beneficial owner, please include a “c/o” before your company name in column A of your file.
- For foreign addresses, the two character country code must be provided in column H, all address information (including full country names and provinces) must be included in the two address fields (columns B-C), and the city, state, zip fields (columns D-G) must be left blank.

Securities

- All transactions and holding positions **must** reference an appropriate security identifier (CUSIP, ISIN, or SEDOL) in column L of your file.
- Security code should be referenced in column X of your file.
- Negative values may **only** be given for short beginning or ending/unsold holdings (transaction type “B” and “U”), and should be formatted with a negative symbol such as - **9999999999999999.0000**. All other transactions must reflect positive values.

Transfers

Free receive/free deliver (transfer in/out) transactions are not eligible for payment unless you have additional information regarding the original purchase(s) from the prior account or the ultimate sale(s) or ending holdings from the subsequent account.

If you have this information, you must combine or amend your accounts as follows:

- Shares Received into Account – Provide the beginning holdings and/or original purchase of these shares from the prior account rather than the “free receive” transaction.
- Shares Delivered out of Account – Provide the sale(s) and/or ending holdings from the subsequent account rather than the “free deliver” transaction.

If you have no information available on the original purchase/subsequent sale, you must provide the free receive/deliver transactions in their respective claim(s) for **balancing purposes only**. A free receive or transfer in must be reflected as a transaction type “R” and a free deliver or transfer out must be reflected as a transaction type “D” (prices and net amounts must be zero). THESE TRANSACTIONS WILL NOT BE CONSIDERED ELIGIBLE AND WILL BE EXCLUDED FROM THE CALCULATION OF YOUR CLAIM.

