### UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

STEPHEN SULLIVAN, WHITE OAK FUND LP, CALIFORNIA STATE TEACHERS' RETIREMENT SYSTEM, SONTERRA CAPITAL MASTER FUND, LTD., FRONTPOINT PARTNERS TRADING FUND, L.P., AND FRONTPOINT AUSTRALIAN OPPORTUNITIES TRUST on behalf of themselves and all others similarly situated,

Plaintiffs,

- against -

BARCLAYS PLC, BARCLAYS BANK PLC, BARCLAYS CAPITAL INC., BNP PARIBAS S.A., CITIGROUP, INC., CITIBANK, N.A., COÖPERATIEVE CENTRALE RAIFFEISEN-BOERENLEENBANK B.A., CRÉDIT AGRICOLE S.A., CRÉDIT AGRICOLE CIB, DEUTSCHE BANK AG, DB GROUP SERVICES UK LIMITED, HSBC HOLDINGS PLC, HSBC BANK PLC, ICAP PLC, ICAP EUROPE LIMITED, J.P. MORGAN CHASE & CO., JPMORGAN CHASE BANK, N.A., THE ROYAL BANK OF SCOTLAND PLC, SOCIÉTÉ GÉNÉRALE SA, UBS AG AND JOHN DOE NOS. 1-50,

Defendants.

STATE OF FLORIDA ) ss. PALM BEACH COUNTY )

## SUPPLEMENTAL AFFIDAVIT OF ERIC J. MILLER ON BEHALF OF A.B. DATA, LTD. REGARDING REQUESTS FOR EXCLUSION

- I, Eric J. Miller, being duly sworn, certify as follows:
- 1. I am the Vice President of Client Services of A.B. Data, Ltd.'s Class Action Administration Division ("A.B. Data"). I am over 21 years of age and am not a party to this Action. My business address is 3507 Kyoto Gardens Drive, Suite 200, Palm Beach Gardens, FL 33410, and my telephone number is 561-336-1801. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

Docket No. 13-cv-02811 (PKC)

- 2. This supplemental affidavit updates my affidavit dated April 27, 2018 that reported on all Persons who submitted a timely Request for Exclusion from the Settlement Class as required by Paragraph 35 of the Order Preliminarily Approving Proposed Settlements with Deutsche Bank AG and DB Group Services (UK) Ltd., Scheduling Hearing for Final Approval of Proposed Settlements with Barclays plc, Barclays Bank plc, Barclays Capital, Inc., HSBC Holdings plc, HSBC Bank plc, Deutsche Bank AG and DB Group Services (UK) Ltd., and Approving the Proposed Form and Program of Notice to the Class, signed on July 5, 2017 (ECF No. 364) (the "Preliminary Approval Order").
- 3. On May 1, 2018, A.B. Data received an additional Request for Exclusion from the Settlement Class. This Request for Exclusion reflected a postmark date of April 20, 2018, in compliance with the Court's Order Extending the Request for Exclusion Deadline in connection with Plaintiffs' Class Action Settlements with Barclays plc, Barclays Bank plc, Barclays Capital, Inc., Deutsche Bank AG and DB Group Services (UK) Ltd., HSBC Holdings plc, and HSBC Bank plc, dated April 12, 2018 (ECF No. 416), and is therefore considered to be timely filed.
- 4. As a result, A.B. Data has received a total of seven Requests for Exclusion from the Settlement Class postmarked on or before April 20, 2018. Attached hereto as Exhibit A is an updated summary report of the seven exclusions from potential Settlement Class Members received as of the date of this Affidavit.
- 5. Pursuant to Paragraph 25 of the Preliminary Approval Order and Section III.B. of the Mailed Notice, those members of the Settlement Class who wished to object to any aspect of the Settlements, application for attorneys' fees and expenses, or the Final Approval Order and Final Judgment were to file such objection with the Court and serve on Class Counsel and counsel of record for Barclays, Deutsche Bank, and HSBC no later than April 13, 2018.

2

<sup>&</sup>lt;sup>1</sup> Unless otherwise defined herein, all capitalized terms used herein shall have the meanings set forth in the Preliminary Approval Order, the Notice, and/or the Settlement Agreements.

6. As of the date of this Affidavit, A.B. Data has not received any objections to the Settlements and A.B. Data knows of no objections sent to Class Counsel or counsel for Barclays, Deutsche Bank, and HSBC.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 2nd day of May 2018.

Eric J. Miller

SUBSORIBED and SWORN before me this 2nd day of May 2018.

STEVEN STRAUB, Notary Public My commission expires May 18, 2020. NOTARL PUBLIC

# EXHIBIT A

#### Case 1:13-cv-02811-PKC Document 419-1 Filed 05/02/18 Page 5 of 5

## **Euribor Litigation** Exclusion Report

Name	Exclusion ID #	Postmark	Timely?	Contact information?	Name of Action?	Statement that Class Member?	Transactions Statement?	Exclusion Statement?	Signed?	Notarized?
1. Raymond Wang	47641157	1/17/2008	Υ	Y	Υ	Υ	N	Υ	Υ	N
2. Akira Kusukawa	47641168	1/19/2008	Y	Y	N	N	N	Y	Υ	N
3. Paul Littlefield	47641225	3/12/2018	Y	N	Υ	N	N	Y	N	N
4. Banco de la Nación del Peru	47647154	3/13/2018	Y	Y	Υ	N	N	Y	Υ	Y
5. Helmut Specht	47647155	4/8/2018	Y	Y	Υ	N	Y	Y	Υ	N
6. Hendrik (Henk) de Rijck	47647156	4/19/2018	Y	Y	N	N	N	Y	N	N
7. Milan Orendáč	47647157	4/20/2018	Y	Υ	Υ	N	N	Υ	Υ	Y