UNITED STATES DISTRICT COURT FOR THE 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.,

Defendants.

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,

PLAINTIFFS' NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the

Declarations of Kenneth R. Feinberg, Esq., Christopher Lovell, Esq., and Vincent Briganti, Esq., and the exhibits attached thereto, including the Settlement Agreement ("Settlement"), and the record herein, Plaintiffs, by and through their undersigned counsel, will respectfully move this Court, before the Honorable P. Kevin Castel, United States District Judge, at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York on a date

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and time to be set by the Court, for an order granting Plaintiffs' motion for preliminary approval

of the Settlement Agreement between Plaintiffs and Barclays plc, Barclays Bank plc and

Barclays Capital Inc. and the other relief set forth in the proposed order annexed hereto.

Dated: New York, New York October 30, 2015

> By: /s/ Vincent Briganti Vincent Briganti Geoffrey Horn Lowey Dannenberg Cohen & Hart, P.C. White Plains Plaza One North Broadway, Suite 509 White Plains, New York 10601 Tel: (914) 997-0500 Fax: (914) 997-0035 vbriganti@lowey.com ghorn@lowey.com

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