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.

Docket No. 13-cv-02811 (PKC)

DECLARATION OF LEE ALBERT IN SUPPORT OF CLASS COUNSEL'S MOTION FOR AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES

I, Lee Albert, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I am a partner with the law firm of Glancy Prongay & Murray LLP. The statements herein are true to the best of my personal knowledge, information and belief based on the books and records of Glancy Prongay & Murray LLP and information received from its attorneys and staff.

2. Glancy Prongay & Murray LLP serves as additional Plaintiffs' counsel for the putative class in the above-captioned action.

3. I respectfully submit this declaration in support of Class Counsel's Motion for Award of Attorneys' Fees and Reimbursement of Expenses and seek attorneys' fees and reimbursement of expenses in this Actions.

4. During the course of this litigation, and as detailed herein, Glancy Prongay & Murray LLP worked on assignments that it was specifically directed to perform by Class Counsel, Lowey Dannenberg, P.C. and Lovell Stewart Halebian Jacobson LLP.

5. Set forth below are Glancy Prongay & Murray LLP's legal services rendered in this litigation, the lodestar value of those services and the expenses reasonably incurred by the firm in connection with this litigation for which reimbursement is requested.

6. Among the services Glancy Prongay & Murray LLP performed on behalf of the putative class in connection with the prosecution of the litigation include, but are not limited to, the following: assisted in the preparation of the Amended Class Action complaint; multiple emails regarding Plaintiff White Oak Fund transaction records; worked extensively with Plaintiff White Oak Fund to gather and analyze its relevant documents; reviewed Plaintiff White Oak Fund documents for relevance and privilege; conferred with Class Counsel about Plaintiff White Oak Fund's records; conferred with Class Counsel and additional Plaintiffs' counsel concerning settlement allocation issues; corresponded with Class Counsel and additional Plaintiffs' counsel about settlement allocation

issues; prepared Euribor research and analysis regarding settlement allocation issues; attended meetings regarding settlement allocation issues; reviewed, analyzed, and coded discovery documents produced by Defendants, including those produced by JPMorgan; and drafted memoranda summarizing document relevance and case-specific issues.

7. The schedule in ¶ 8 below is a summary reflecting the amount of time spent by the attorneys and professional support staff of Glancy Prongay & Murray LLP involved in this litigation, and the lodestar calculations based on the firm's current hourly billing rates. The schedule was prepared based upon daily time records maintained by attorneys and professional support staff at Glancy Prongay & Murray LLP. The schedule in ¶ 11 below reflects the expenses incurred by the firm in its representation of the putative class in this litigation thus far. The hourly billing rate for any timekeeper primarily involved in first-level document review has been capped at $350/hour.

8. From the inception of this litigation through February 28, 2018, Glancy Prongay & Murray LLP's total fee compensable time for which it seeks an award of attorneys' fees is summarized below.

Attorneys	**Role**[1]	**Rates**	**Hours**	**Charges**
Brian P. Murray	P	925	51.8	47,915.00
Lee Albert	P	925	21.8	20,165.00
Thomas Kennedy	A	350	203.5	71,225.00
Paralegals and Legal Assistants				
Jack Ligman	PL	310	50.75	15,732.50
Michaela Ligman	PL	290	2.0	580.00
John D. Belanger	PL	225	8.0	1,800.00
TOTALS			337.85	$157,417.50

9. Thus, the total time for which my firm is requesting an award of legal fees is 337.85 hours. The total lodestar value of these professional services is $157,417.50.

[1] "P" refers to Partners. "A" refers to Associates. "PL" refers to Paralegals.

10. The above hourly rates for Glancy Prongay & Murray LLP's attorneys and professional support staff are the firm's current hourly rates. The firm's lodestar figures do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in the firm's current billing rates.

11. As detailed and categorized in the below schedule, Glancy Prongay & Murray LLP has incurred a total of $4,473.23 in expenses for which it is currently requesting reimbursement.

Expense Categories	Cumulative Expenses
Travel - Airfare, Lodging, Meals, Taxi	4,301.31
Computer Research, Databases & Docket	136.00
Postage, Mailing, FedEx, UPS, Fares & Messengers	0.92
Service and Filing Fees	35.00
TOTAL	$4,473.23

12. The above schedule was prepared based upon expense records reflected in the books and records of Glancy Prongay & Murray LLP. These books and records are prepared from expense vouchers, check records, receipts and other source materials.

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

Executed on March 23, 2018

Lee Albert