

**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 CENTRAL RAIFFISEN-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 DOES NOS. 1-50,

Defendants.

No. 13-cv-02811 (PKC)

**DECLARATION OF LES CHAPPELL REGARDING  
MAILING OF THE NOTICE OF PROPOSED CLASS ACTION SETTLEMENT,  
MAY 17, 2019 FAIRNESS HEARING THEREON,  
AND SETTLEMENT CLASS MEMBERS' RIGHTS**

I, Les Chappell, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a Project Manager at Epiq eDiscovery Solutions, Inc. ("Epiq").

My business address is 10300 SW Allen Blvd., Beaverton, OR 97005. I am familiar

with, and have personal knowledge of, the matters stated in this declaration and am competent to testify about them if called upon to do so.

2. Epiq was retained by counsel for the Deutsche Bank Defendants<sup>1</sup> to effect mailing of the Notice of Proposed Class Action Settlement, May 17, 2019 Fairness Hearing Thereon, and Settlement Class Members' Rights (the "Notice"), to certain members of the Settlement Class in connection with the proposed settlements by Citigroup Inc. and Citibank, N.A. (collectively, "Citi") and JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. (collectively, "JPMorgan"), as described more fully below.<sup>2</sup>

### **MAILING OF CITI AND JPMORGAN SETTLEMENT NOTICE**

3. On February 13, 2019, the Deutsche Bank Defendants' counsel provided Epiq with a list of 786 unique names and addresses of identified potential Settlement Class members.<sup>3</sup>

4. On or before February 27, 2019, pursuant to the Order entered by this Court on December 19, 2018, Epiq mailed copies of the Notice by first class mail to each of the 786 potential Settlement Class members. This mailing was performed using the facilities of Epiq Systems Ltd., Epiq's affiliate located in the United Kingdom. A sample of the Notice is attached hereto as Exhibit A.

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<sup>1</sup> Deutsche Bank AG and DB Group Services (UK) Limited.

<sup>2</sup> All terms with initial capitalization not otherwise defined herein shall have the meanings ascribed to them in the Order Preliminarily Approving Proposed Settlement with JPMorgan Chase & Co., JPMorgan Chase Bank, N.A., Citigroup, Inc., and Citibank, N.A., Scheduling Hearing for Final Approval of Thereof, and Approving the Proposed Form and Program of Notice to the Class, dated December 19, 2018 (the "Order").

<sup>3</sup> I understand that the Deutsche Bank Defendants retained Epiq to directly provide notice to these potential Settlement Class members who entered into Euribor-Based Derivatives transactions with the Deutsche Bank Defendants during the class period. I understand that the Deutsche Bank Defendants provided the names of U.S.-based potential Settlement Class members to the Settlement Administrator, which was retained by the Plaintiffs, but retained Epiq to provide notice to potential Settlement Class members who may be domiciled outside of the United States, and whose names and addresses the Deutsche Bank Defendants therefore preferred not to provide to the Settlement Administrator.

5. As a result of the efforts described above, as of February 27, 2019, Epiq has mailed a total of 786 Notices.

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

Executed this 5th day of March, 2019 in Beaverton, OR.

  
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Les Chappell