



March 26, 2019

VIA ECF AND FEDEX

The Honorable P. Kevin Castel
United States Courthouse
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: *Sullivan v. Barclays plc et al.*, No. 13-cv-2811

Dear Judge Castel:

We are Class Counsel in the above-captioned action.

Per the Settlement Agreement, Citi and JPMorgan provided Mailed Notice to potential Settlement Class Members whose contact information may not be disclosed to the Claims Administrator because of foreign data privacy laws. We enclose declarations from Citi's and JPMorgan's noticing agent concerning these Mailed Notices.

We also enclose declarations from third party noticing agents on behalf of Barclays and Deutsche Bank, who previously provided similar Mailed Notice to potential Settlement Class Members in connection with Barclays', Deutsche Bank's, and HSBC's settlements. These noticing agents also sent Mailed Notices concerning the Citi and JPMorgan settlement to potential Settlement Class Members from those previous settlements whose contact information was not provided to the Claims Administrator due to foreign data privacy laws.

The next conference before the Court will be on May 17, 2019 for the Settlement Hearing.

Respectfully submitted,

/s/ Vincent Briganti
Vincent Briganti

/s/ Christopher Lovell
Christopher Lovell

Encs.

cc: All Counsel of Record (via ECF)