

**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 AJMAL CHOUDRY REGARDING MAILING
OF THE NOTICE OF PROPOSED CLASS ACTION SETTLEMENT**

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

1. I am a Project Manager at Epiq Class Action & Claims Solutions, Inc. ("Epiq"). My business address is 110 Bishopsgate, London, EC2N 4AY. 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 Defendants¹ to effectuate mailing of the Notice of Proposed Class Action Settlement and Proof of Claim and Release (together, the “Notice Packet”) to certain members of the settlement class in connection with the proposed settlement with Crédit Agricole S.A. and Crédit Agricole CIB in the above-captioned case, as described more fully below.

MAILING OF THE NOTICE PACKET

3. On May 31, 2022, the Deutsche Bank Defendants’ counsel provided Epiq with a list of 782 unique names and addresses of identified potential settlement class members.²

4. On or before July 13, 2022, pursuant to the Order entered by this Court on May 9, 2022, Epiq mailed copies of the Notice Packet by first class mail to each of the 782 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 Packet is attached hereto as Exhibit A.

5. None of the 782 Notice Packets that were mailed to potential settlement class members were sent to addresses with mailing restrictions or suspensions.

¹ Deutsche Bank AG and DB Group Services (UK) Ltd.

² I understand that the Deutsche Bank Defendants retained Epiq to directly provide notice to these 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.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 13 day of July, 2022 in London, United Kingdom.



Ajmal Choudry