

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 WHITE OAK FUND LP IN SUPPORT OF CLASS COUNSEL'S
MOTION FOR AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES,
AND PLAINTIFFS' REQUEST FOR INCENTIVE AWARDS**

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

1. I am an individual over the age of 18. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. I am the Managing Member of White Oak Fund LP ("White Oak") and one of the Class Plaintiffs. White Oak is a private placement fund headquartered in Burr Ridge, Illinois and I am authorized to provide this declaration on behalf of White Oak Fund LP.

3. I am the Managing Member of Four Oaks Asset Management which is a registered commodity pool operator with the NFA. Four Oaks is the managing member of White Oak Fund LP. As manager, I have Sona Trading Strategies (a commodity trading advisor) manage the money in the White Oak Fund consistent with their managed futures strategies.

4. I voluntarily undertook the burdens and risks associated with this lawsuit when I reviewed the Amended Complaint and joined this lawsuit as one of the Class Plaintiffs on November 4, 2013.

5. Prior to serving as a Class Representative, I was not asked to condition, nor did I condition, my participation upon receiving an incentive award. Additionally, I was not asked to condition, nor did I condition, my approval of any of the settlements upon the promise or expectation of receiving an incentive award.

6. As a Class Plaintiff I have participated in this lawsuit by following the status and progress of the case and discussing the case with my counsel, both over the phone and in person, and by email, to stay informed.

7. Since the inception of White Oak joining this case in 2013, I have diligently performed my duties as a Class Representative to assist my counsel in prosecuting this case, investing significant time and effort to fulfill my role. To that end, I have read the operative complaint on file and generally understand the nature of the claims asserted, as well as the basis for them. Throughout this litigation over the past nine years, I have remained informed about the status of the case by communicating with my attorneys about litigation strategies, reviewing periodic updates from my counsel, and becoming apprised of key case documents. Since the outset of the litigation, I have also diligently assisted my attorneys to gather all necessary documentation requested.

8. I estimate that I have spent at least 22 hours performing all of the above-described duties on behalf of the class during the course of this litigation. While I do not have a normal hourly rate, I estimate that a reasonable hourly rate for someone in my position would conservatively be \$225.00 per hour.

9. My attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee of personal benefit. I believe that the time, effort, and information I provided helped to make the settlements possible and therefore ask that the Court approve my incentive award in the amount of \$4,950. I believe such an award is reasonable in light of the assistance provided and poses no risk of undermining my ability to adequately represent the Class.

10. In conclusion, I am familiar with the prosecution and settlement of this Action, and support the Settlement with Crédit Agricole as fair, reasonable, and adequate. I believe the Settlement represents a favorable recovery for the Class in light of the risks of continued litigation. I support Class Counsel's motion for attorneys' fees and reimbursement of litigation expenses. Finally, I request an incentive award on behalf of Plaintiff White Oak Fund LP to account for my time and expenses in pursuing this action. Accordingly, I respectfully request that the Court approve (i) Plaintiffs' motion for final approval of the proposed Settlement; and (ii) Class Counsel's motion for award of attorneys' fees, reimbursement of expenses, and Plaintiffs' request for incentive awards.

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

Executed on August 8, 2022 in Burr Ridge, Illinois.

A handwritten signature in black ink, appearing to read "W. Sullivan", written over a horizontal line.

William Sullivan