

**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)

**SECOND SUPPLEMENTAL DECLARATION OF STEVEN STRAUB ON BEHALF OF
A.B. DATA, LTD. REGARDING REPORT ON REQUESTS FOR EXCLUSION**

Pursuant to 28 U.S.C. §1746, I, Steven Straub, declare:

1. I am Claimant Operations Director of A.B. Data, Ltd.'s Class Action Administration Company ("A.B. Data"). I am over 21 years of age and am not a party to the above-captioned action (the "Action"). My business address is 600 A.B. Data Drive, Milwaukee, WI 53217. A.B. Data was authorized to act as the Claims Administrator in connection with the

settlement in the Action.¹ I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. This second supplemental declaration updates my previous supplemental declaration dated September 2, 2022 (ECF No. 543), concerning the report on all Persons who submitted a timely Request for Exclusion from the Settlement Class pursuant to the Order Preliminarily Approving Proposed Settlements with Crédit Agricole S.A. and Crédit Agricole CIB, Scheduling Hearing for Final Approval Thereof, and Approving the Proposed Form and Program of Notice to the Class (ECF No. 520 ¶ 30).

3. On October 6, 2022, A.B. Data received a fourth Request for Exclusion from the Settlement Class submitted by the United Nations World Food Programme (“WFP”). The Request for Exclusion did not contain a postmark date but contained a letter dated September 28, 2022 in which WFP requested exclusion pursuant to “its status as a joint subsidiary organ of the United Nations and the Food and Agriculture Organization of the United Nations. WFP advised that, pursuant to Articles 104 and 105 of the Charter of the United Nations and the Convention on the Privileges and Immunities of the United Nations of 13 February 1946 (the “General Convention”), it is immune from legal process unless such immunity is waived. WFP further advised that it does not waive its immunity and voluntarily wishes not to be a part of the Settlement Class or to receive any monies from the relevant settlement.

4. On October 14, 2022, A.B. Data received a fifth Request for Exclusion from the Settlement Class submitted by the Bank of Sydney Limited A.C.N. (formerly known as Beirut Hellenic Bank, Ltd and further formerly known as Laiki Bank (Australia) Ltd). The Request for

¹ Unless otherwise noted, capitalized terms not defined herein have the same meaning as in the Mailed Notice and the Stipulation and Agreement of Settlement between Plaintiffs and Crédit Agricole dated March 10, 2022 (the “Settlement Agreement”). ECF No. 518-1.

Exclusion did not contain a postmark date but contained a letter dated August 15, 2022. The envelope also contained the same handwritten date.

5. As a result, as of the date of this Declaration, A.B. Data has received a total of five Requests for Exclusion from the Settlement Class. Attached hereto as Exhibit A is an updated summary report of the five exclusion requests from potential Settlement Class Members received as of the date of this Declaration, including information concerning the postmark date (if available) and the date the exclusion request was received.

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

Executed this 20th day of October 2022.

A handwritten signature in purple ink, appearing to read 'S. Straub', is written over a horizontal line. The signature is stylized and somewhat cursive.

Steven Straub

EXHIBIT A

Euribor Litigation
Exclusion Report

Name	Exclusion ID #	Postmark	Timely?	Contact Information?	Name of Action?	Class Member Statement?	Transaction(s) Statement?	Exclusion Statement?	Signed?	Notarized?
1. Akira Kusakawa	47647167	7/2/2022	Y	Y	N	N	N	Y	Y	N
2. Erez Wasserman	47647168	8/6/2022	Y	N	N	N	N	Y	Y	N
3. Zuzana Kostova	47647169	8/12/2022	Y	Y	Y	N	N	Y	Y	N
4. World Food Programme	47647171	9/29/2022	N	N	Y	N	N	Y	Y	N
5. Bank of Sydney Limited A.C.N.	47647172		N	Y	Y	N	N	Y	Y	N
6.										
7.										
8.										