

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE SSA BONDS ANTIRUST LITIGATION

Civil Action No. 1:16-cv-03711-ER

**DECLARATION OF
MARKHAM SHERWOOD REGARDING
DISSEMINATION OF NOTICE FOR
THREE SETTLEMENTS**

I, Markham Sherwood, hereby declare under penalty of perjury as follows:

1. I am a Senior Settlement Consultant at the class action notice and settlement administration firm, Angeion Group, LLC (“Angeion”). I am fully familiar with the facts contained herein based upon my personal knowledge.

2. Angeion has administrated class action settlements involving millions of class members. A representative list of the settlements administered by Angeion is available at <http://www.angeiongroup.com/cases.htm>.

3. Angeion is not related to or affiliated with any of the attorneys comprising class counsel or counsel for defendants.

4. Angeion was retained as the Claims Administrator for the Settlements and appointed by the Court pursuant to the Court’s Order Providing for Notice to the Settlement Classes and Preliminarily Approving the Plan of Allocation (the “Notice Order”) entered on July 15, 2020. The purpose of this declaration is to provide the Court with an update regarding the dissemination of notice to members of the Settlement Classes.

Mailed Notice

5. Between July 16, 2020 and September 24, 2020, Angeion received from Plaintiffs’ Counsel seven files from the Settling Defendants containing contact data for members of the

Settlement Classes (“Class List”). After standardizing, normalizing, and de-duping the data, the Class List contained 10,052 unique name and address records.

6. Prior to mailing the Notice of Proposed Settlements of Class Action (the “Notice”) and Proof of Claim and Release Form (the “Claim Form”) (collectively, the “Notice Packet”), Angeion ran the domestic addresses contained on the Class List through the United States Postal Service’s (“USPS”) National Change of Address (“NCOA”) database, which provides updated addresses for all individuals who have moved during the previous four years and filed a change of address form with the USPS.

7. On October 29, 2020 (the “Notice Date”), Angeion caused the Notice Packets to be mailed to the 10,052 identified class members contained on the Class List. The Notice Packets were sent via USPS First-Class mail, postage prepaid.

8. As in most cases of this nature, potential members of the Settlement Classes may be beneficial purchasers whose securities are held in “street name” – *i.e.*, the securities are purchased by brokerage firms, banks, institutions and other third-party nominees (“Nominees”) in the name of the Nominee. To reach potential members of the Settlement Classes whose securities are held in street name, Angeion used its proprietary database of 2,918 known securities brokers, dealers, banks, and other Nominees to be used for notifying record holders of settlements (the “Broker Database”). On the Notice Date, Angeion caused Notice Packets to be mailed to the 2,918 Nominees in the Broker Database via USPS First Class Mail, postage prepaid.

9. Since the Notice Date, Angeion has received requests from Nominees to either (i) send the Notice Packet to the Nominee for distribution, or (ii) send the Notice Packet directly to the Nominee’s customers, whose contact information the Nominee provided to Angeion. Through December 15, 2020, as a result of these requests, Angeion mailed an additional 13,274 Notice

Packets, all directly to potential members of the Settlement Classes.

10. As a result of the efforts described in the Paragraphs 5 through 9 above, as of December 15, 2020, Angeion has mailed a total of 26,244 Notice Packets to potential members of the Settlement Classes.

Publication Notice

11. Angeion caused the Summary Notice to be published in the following media publications: *The Wall Street Journal* (National Edition, November 6, 2020); *The Financial Times* (Global Edition, November 6, 2020); *The New York Times* (National Edition, November 6, 2020); *The Economist* (Global Edition, November 7, 2020); *Bloomberg Business Week* (Global Edition, November 9, 2020); *Bond Buyer* (National Edition, November 5, 2020); and *EuroMoney* (Global Edition, November 13, 2020).

Digital Media Campaign

12. In addition to the above publications, Angeion also conducted a digital media campaign by placing banner ads on the following sites between October 29, 2020 and November 9, 2020, inclusive: *The Wall Street Journal* (Europe and Asia), which delivered 358,608 impressions on the display network; and between November 1, 2020 and November 9, 2020, inclusive: *Bloomberg Businessweek* (Global); which delivered 390,714 impressions.

Settlement Website

13. On or before October 27, 2020, Angeion established and is currently maintaining a website devoted to the Settlements: www.SSABondsAntitrustSettlement.com (the “Settlement Website”). The Settlement Website contains general information about the Settlements and related deadlines as well as important documents, including, among others, a downloadable Notice and Claim Form, the Stipulation and Agreement of Settlement with Deutsche Bank, the Stipulation

and Agreement of Settlement with HSBC, the Stipulation and Agreement of Settlement with Bank of America, and the Notice Order. The Settlement Website also contains an electronic version of the Claim Form wherein potential members of the Settlement Classes can file their claims online via the Settlement Website. The Settlement Website also contains a Contact Us link whereby members of the Settlement Classes can send an email to a dedicated email address established for the Settlements: info@SSABondsAntitrustSettlement.com. Angeion will continue maintaining and, as appropriate, updating the Settlement Website until the conclusion of this administration.

Toll-Free Hotline

14. On or before October 29, 2020, Angeion established the following toll-free hotline devoted to the Settlements: 1-855-966-3307. The toll-free hotline utilizes an interactive voice response (“IVR”) system to provide callers with responses to frequently asked questions and to inform members of the Settlement Classes of important dates and deadlines pertinent to the Settlements. The toll-free hotline is accessible 24 hours a day, 7 days a week. Callers also have the ability to leave a message requesting a Claim Form and/or Notice via the toll-free hotline, and have the option to speak with a live operator during regular business hours if they have additional questions. Angeion will update the IVR as necessary through the administration of the Settlements.


Report on Requests for Exclusion and Objections Received to Date

15. The deadline for members of the Settlement Classes to request exclusion from the Settlement Classes is February 1, 2021. As of December 21, 2020, Angeion has not received any requests for exclusion from the Settlement Classes. Additionally, although the Notice directs the submission of objections to counsel and the Court, Angeion can also confirm that it has not received any objections to the Settlements. Angeion will inform the Parties of any requests for

exclusion, or objections to the Settlements, it receives on or before the February 1, 2021 deadline. Angeion will also inform the Parties of any requests for exclusion or objections to the Settlements after the February 1, 2021 deadline.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: December 22, 2020



MARKHAM SHERWOOD

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on December 28, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ DAVID W. MITCHELL

DAVID W. MITCHELL

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Mailing Information for a Case 1:16-cv-03711-ER In re SSA Bonds Antitrust Litigation**Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Irving Firemen's Relief and Retirement Fund

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