UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION	MDL No. 1:11-md-2262-NRB
THIS DOCUMENT RELATES TO:	Honorable Naomi Reice Buchwald
MAYOR AND CITY COUNCIL OF BALTIMORE, et al., Plaintiffs, v. CREDIT SUISSE AG, et al., Defendants.	No. 11-cv-5450 (NRB)

DECLARATION OF BACH-VIET NGUYEN IN SUPPORT OF OTC PLAINTIFFS' MOTION TO AUTHORIZE DISTRIBUTION OF THE MUFG, NORINCHUKIN, AND SOCIETE GENERALE NET SETTLEMENT FUND; DISTRIBUTION OF THE RABOBANK, LLOYDS, HBOS, RBC, AND PORTIGON NET SETTLEMENT FUND; SUPPLEMENTAL DISTRIBUTION OF THE BARCLAYS, CITIBANK, DEUTSCHE BANK, AND HSBC NET SETTLEMENT FUNDS TO CLAIMANTS; AND REIMBURSEMENT OF CLAIMS ADMINISTRATION EXPENSES

I, BACH-VIET NGUYEN, of full age, hereby declare under penalty of perjury as follows:

1. I am a Project Manager 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, as well as information that has been provided to me by my colleagues in the ordinary course of business at Angeion.

2. Angeion was retained as the Claims Administrator for the OTC Plaintiffs' Settlement with MUFG Bank, LTD., The Norinchukin Bank, and Société Générale ("MUFG

Settlement") and appointed by the Court pursuant to ¶ 1 of the *Order Approving OTC Plaintiffs' Notice Plan for Settlement with Defendants MUFG Bank, LTD., The Norinchukin Bank, and Société Générale and Appointing a Claims Administrator and Escrow Agent*, entered on June 13, 2023 (Dkt. No. 3683). Angeion was retained as the Claims Administrator for the OTC Plaintiffs' Settlement with Coöperatieve Rabobank U.A., Lloyds Banking Group PLC, Lloyds Bank PLC, HBOS PLC, Bank of Scotland PLC, Royal Bank of Canada, Portigon AG, and Westdeutsche Immobilien Servicing AG ("Rabobank Settlement") and appointed by the Court pursuant to ¶ 1 of the *Order Approving OTC Plaintiffs' Notice Plan for Settlement with Defendants Coöperatieve Rabobank U.A., Lloyds Banking Group PLC, Lloyds Bank PLC, HBOS PLC, Bank of Scotland PLC, Royal Bank of Canada, Portigon AG, and Westdeutsche Immobilien Servicing AG and Appointing a Claims Administrator and Escrow Agent*, entered on August 1, 2023 (Dkt. No. 3711).

3. As Claims Administrator, Angeion has, among other things: (a) mailed the Settlement Notice and Proof of Claim to Class Members, which provided a detailed description of the Settlement and directed Class Members to the case-specific websites devoted to the Settlements, MUFGLIBORSettlement.com and RabobankLIBORSettlement.com (the "Settlement Websites"), where Class Members could review and download additional copies of the Notice as well as other pertinent filings in the case; (b) established and continued to maintain a toll-free helpline for inquiries during the course of claims administration; (c) updated the Settlement Websites, to include the claim-filing deadlines and copies of the important case documents; (d) provided, upon request, additional copies of the Notice to potential Class Members, brokers, and other nominees; (e) received and processed Proof of Claim forms and transactional data submitted in connection with the Settlement; (f) reviewed submitted Proof of Claim forms and transactional data for accuracy and completeness and to ensure that they were supported by sufficient documentary evidence; (g) provided notice to Claimants whose Proof of Claim forms or transactional data were deficient or rejected; and (h) worked with Claimants to answer questions regarding their Claims.

4. The purpose of this declaration is to provide the Court and the parties with information regarding the processing of Proof of Claim forms and transactional data, and our

preparations for distribution.

INTRODUCTION

5. Claims administration for the MUFG and Rabobank Settlements is now complete, and Angeion is prepared for make distributions to Authorized Claimants whose claims are not *de minimis*.

6. The claims administration services provided by Angeion in connection with the Settlements included providing notice to and communicating with potential members of the Settlement Classes, as described in Angeion's previously filed declarations. Angeion has continued to support potential Class Members and Claimants through the following services:

a. Receiving and processing 421 Proof of Claim forms, representing 184,846 financial transactions;

b. Reviewing and responding to emails from potential Class Members to info@MUFGLIBORSettlement.com and info@RabobankLIBORSettlement.com;

c. Reviewing and responding to mailed correspondence;

d. The handling of approximately 640 calls to the case-dedicated toll-free telephone number (1-888-619-8688) to date; and

e. Hosting and maintaining the Settlement Websites (MUFGLiborSettlement.com and RabobankLIBORSettlement.com) which have received approximately 13,600 visits to date.

CLAIMS PROCESSING

7. Angeion was appointed to review and process Proof of Claim forms in the Settlements and to distribute the Settlement Amounts to Authorized Claimants in the Settlements. Angeion created a claims process in which potential Claimants could submit Proof of Claim forms to create a Claim to the Settlements either electronically or in paper form.

8. The claim process began with the processing of Proof of Claim forms for the MUFG Settlement and was expanded to include Proof of Claims forms for the Rabobank Settlement.

PROCEDURES FOLLOWED FOR REVIEWING AND PROCESSING CLAIMS

9. In preparation for the processing of Proof of Claims forms, Angeion created a secure and segregated database for the MUFG and Rabobank Settlements (the "Claims Database"); prepared processing procedures utilizing best practices for claims processing; trained staff in the specifics of the requirements of the Settlements; and developed processes for the capture and analysis of Claims data. Angeion also prepared the online claim submission portals for the Settlement Websites, including filing instructions and procedures for assisting Claimants with the submission of their claims. Angeion also prepared a "bulk claims" filing template spreadsheet to facilitate filings for individual Claimants with large quantities of transactional data or for Brokers, Administrators, and Third Party Filers submitting claims on behalf of multiple Claimants at a time. This template was prepared with input from Bates White, LLC ("Bates White"), an economic consultant firm that assisted with the distributions in the OTC Plaintiffs' Barclays, Citibank, Deutsche Bank, and HSBC Settlements, to ensure that the proper and necessary information could be gathered from Claimants to facilitate the processing of Claimant data. Bates White additionally provided an informational document that guided Claimants through the submission of information and data for certain complex financial instruments. This Guidance on Complex Instruments document was available upon request and Claimants were encouraged and directed via the Settlement Website to request this document if necessary to complete their Proof of Claim form.

10. Pursuant to the Settlement Agreements and Preliminary Approval Orders, Class Members were required to submit Proof of Claim forms to the Claims Administrator postmarked or submitted electronically no later than December 15, 2023, for the MUFG Settlement and no later than February 10, 2024, for the Rabobank Settlement.

11. All data submitted with Claims relating to the Settlements were entered into the Claims Database. Claims relating to the MUFG and Rabobank Settlements were identified and given unique ID numbers to identify them as claims in their respective Settlements. Each Settlement had a separate location within the Claims Database where the Claims data was stored.

12. Angeion received and processed 251 Proof of Claims forms in the MUFG Settlement and 170 Proof of Claims in the Rabobank Settlement. Across both Settlements, including bulk claims filed by Third Party Filers, the 421 filed Claims constituted a total of 2,309

Claimants with more than 184,000 transactions.

13. Utilizing a list of codes used in the prior Settlements, known as "Message Codes", in conjunction with Bates White, Angeion prepared a list of codes to track claims processing outcomes. For example, some Message Codes are applied at a Claim level, meaning the condition pertains to every transaction within a Claimant's Claim, while other Message Codes are applied at a Transactional level, indicating that a condition is specific to a particular financial transaction within a Claimant's Claim.

14. Angeion's processing of the Proof of Claim forms included a review for duplicate and fraudulent claims, as well as claims filed by excluded parties or those who submitted "Opt-Out" requests in either of the Settlements. This included a preliminary check against claimant names and account numbers filed in the preceding OTC Plaintiff Settlements to flag them as potential duplicates or amendments of the prior claims.

15. Transactional and Claim data, including the details of each transaction submitted by the Claimants, was electronically packaged and sent via secure file transfer protocol to Bates White for further analysis and validation, including comparison to additional data possessed by Bates White from the prior OTC Plaintiff Settlements. Bates White returned validated Claim information back to Angeion, which was applied to the Claims in the Claims Database.

16. Angeion prepared a Deficiency Notice for Claimants with deficient or ineligible Claims or Transactions. A Claims Validation portal was established to assist Claimants with reviewing and responding to the Deficiency Notices and included:

a. A Guide/Instructions page and downloadable PDF of the same, which included instructions on how to access the processed Claim information and the deadlines and instructions for responding to deficiency or ineligibility determinations.

b. A Message Code Legend and downloadable PDF of the same, which included a list of Message Codes applied to Claims and Transactions during validation, and a description of their meaning, as well as the method by which to cure each Message Code.

c. A list of downloadable Attestation Forms, which Claimants could use when

providing responses to deficiency conditions within their claims. Attestation Forms were required under certain circumstances—for example, any Claimant who supplemented their transaction data in response to a Deficiency Notice was required to submit a Supplemental Attestation certifying the accuracy of the supplemental data.

d. Transactional data of each Claim, accessible by entering the Claimant ID and confirmation code provided to the Claimant in the Deficiency Notice. This transactional data file was in a commonly used Excel format, reflecting all transactional data in the Claims Database for the Claim with deficient and ineligible Message Codes applicable to each transaction, and included columns for the Claimant to update when providing a responsive file to correct deficiencies or update information about deficient or ineligible transactions.

e. An upload tool, allowing Claimants to upload responsive information to Angeion for processing.

17. Angeion prepared the Deficiency Notices, created login credentials for each Claimant and loaded the validated Claim data into the Deficiency Portal for Claimants to download. On December 18, 2024, Angeion caused Deficiency Notices to be distributed to 268 Claimants via email with a deadline to respond of January 3, 2025.[1]. The purpose of the Deficiency Notice, per paragraph 11(c)(iv) of the Settlement Agreements, was to provide information on how to make corrections or request reconsideration of the deficiency or ineligibility determination. The notices stated in clear and conspicuous language that failure to appropriately respond to the notice with a curative or supplemental submission would result in complete or partial rejection of the claim or transactions in question.

18. Angeion assisted Claimants with questions received via email and the toll-free telephone line regarding the Deficiency Notices and as needed, escalated to Class Counsel and Bates White to determine appropriate responses. Approximately 95 responses were received and processed, both through the Claims Validation portal and via email.

19. The processed Deficiency Notice response data was packaged and sent by secure

[1] This represents a sixteen (16) day response period, providing an additional two days due to the holidays.

file transfer to Bates White for re-validation. No claimant indicated that it disputed the Claims Administrator's determination and would seek review by the Court pursuant to paragraph 11(c)(v) of the Settlement Agreements.

PREPARATIONS FOR DISTRIBUTION

20. In preparation for the distribution of the MUFG and Rabobank Settlements, Angeion aggregated the Claimant and final claim determination information from the MUFG and Rabobank Settlements, as well as information on Authorized Claimant who successfully received an initial distribution from the prior Barclays, Citi, Deutsche Bank, and HSBC Settlements. Authorized Claimants from the prior Settlements were not required to submit a new claim to participate in the MUFG and Rabobank Settlements and are eligible for distribution based on their final claim determination from those Settlements.

21. The calculations performed by Bates White to determine the final pro rata share of each Authorized Claimant to each Settlement Fund is described in the Declaration of Ilan Guedj accompanying OTC Plaintiffs' motion. Using this information, Angeion is prepared to distribute to the new Claimants in the MUFG and Rabobank Settlements, as well as the Authorized Claimants that cashed their payment awards in the prior OTC Plaintiff Settlements, in accordance with the Plan of Distribution.

CLAIMS ADMINISTRATION EXPENSES

22. Angeion has incurred $198,528.94 in unreimbursed expenses for claims administration of the MUFG and Rabobank Settlements.

23. Angeion estimates that it will incur no more than $92,612.84 in additional expenses, consisting primarily of the cost of check postage, check printing, tax reporting, maintenance and other related administrative services, to complete this initial distribution from the MUFG and Rabobank Settlements.

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

Dated: September 30, 2025

Bach-Viet Nguyen

BACH-VIET NGUYEN