

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

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

**OTC PLAINTIFFS' NOTICE OF MOTION TO
AUTHORIZE DISTRIBUTION OF THE MUFG, NORINCHUKIN, AND SOCIETE
GENERALE NET SETTLEMENT FUND; DISTRIBUTION OF THE RABOBANK,
LLOYDS, HBOS, ROYAL BANK OF CANADA, AND PORTIGON NET SETTLEMENT
FUND; SUPPLEMENTAL DISTRIBUTION OF THE BARCLAYS, CITIBANK,
DEUTSCHE BANK, AND HSBC NET SETTLEMENT FUNDS; AND
REIMBURSEMENT OF CLAIMS ADMINISTRATION EXPENSES**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

PLEASE TAKE NOTICE that, on a date and at a time to be determined by the Court, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007, in the Courtroom of the Honorable Naomi Reice Buchwald, OTC Plaintiffs will, and hereby do, move the Court to authorize a distribution of the MUFG, Norinchukin, and Société Générale Net Settlement Fund, distribution

of the Rabobank, Lloyds, HBOS, Royal Bank of Canada, and Portigon Net Settlement Fund; supplemental distribution of the Barclays, Citibank, Deutsche Bank, and HSBC Net Settlement Funds; and reimbursement of claims administration expenses.

Submitted herewith in support of OTC Plaintiffs' motion are: (i) the Memorandum of Law in support; (ii) the Declaration of Bach-Viet Nguyen; (iii) the Declaration of Amy Lake; (iv) the Declaration of Ilan Guedj and appendices thereto; and (v) a Proposed Order granting the motion.

Dated: September 30, 2025

By: /s/ Michael D. Hausfeld

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Co-Lead Class Counsel for the OTC Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2025, I caused the foregoing document to be served via the Electronic Case Filing (ECF) system in the United States District Court for the Southern District of New York, on all parties registered for CM/ECF in the above-captioned matter.

Dated: September 30, 2025

/s/ Geng Chen
Geng Chen

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

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

**[PROPOSED] ORDER
AUTHORIZING DISTRIBUTION OF THE MUGF, NORINCHUKIN, AND SOCIETE
GENERALE NET SETTLEMENT FUND; DISTRIBUTION OF THE RABOBANK,
LLOYDS, HBOS, ROYAL BANK OF CANADA, AND PORTIGON NET SETTLEMENT
FUND; SUPPLEMENTAL DISTRIBUTION OF THE BARCLAYS, CITIBANK,
DEUTSCHE BANK, AND HSBC NET SETTLEMENT FUNDS; AND
REIMBURSEMENT OF CLAIMS ADMINISTRATION EXPENSES**

WHEREAS, on August 1, 2018, this Court entered a Memorandum, Order, and Judgment granting final approval of the settlement between OTC Plaintiffs and Barclays Bank plc and of the settlement between OTC Plaintiffs and Citibank, N.A. and Citigroup Inc. (Dkt. No. 2655);

WHEREAS, on October 25, 2018, this Court entered a Final Judgment and Order Granting Final Approval of Settlements with Deutsche Bank Aktiengesellschaft and HSBC Bank plc (Dkt. No. 2746);

WHEREAS, the Court previously appointed Rust Consulting, Inc. (“Rust”) as the Claims Administrator for these four settlements (Dkt. No. 1948; Dkt. No. 2247; Dkt. No. 2480; Dkt. No. 2481);

WHEREAS, the Court previously approved Plans of Distribution for these four settlements (Dkt. No. 2655; Dkt. No. 2746);

WHEREAS, the Court previously granted OTC Plaintiffs’ Motion to Authorize Distribution of the Barclays, Citibank, Deutsche Bank, and HSBC Net Settlement Funds to Claimants and Reimbursement of Claims Administration Expenses (“Distribution Order”) (Dkt. No. 3300);

WHEREAS, the Court previously granted OTC Plaintiffs’ Motion to Authorize Amended Distribution of the Barclays, Citibank, Deutsche Bank, and HSBC Net Settlement Funds to Claimants and Reimbursement of Additional Claims Administration Expenses (“Amended Distribution Order”) (Dkt. No. 3331);

WHEREAS, on October 17, 2023, this Court entered a Final Judgment and Order granting final approval of the settlement between OTC Plaintiffs and MUFG Bank, Ltd., The Norinchukin Bank, and Société Générale (“MUFG Settlement”) (Dkt. No. 3782);

WHEREAS, on December 12, 2023, this Court entered a Final Judgment and Order granting final approval of the settlement between OTC Plaintiffs and Coöperatieve Rabobank U.A., Lloyds Banking Group plc, Lloyds Bank plc, HBOS plc, and Bank of Scotland plc, Royal Bank of Canada, Portigon AG, and Westdeutsche Immobilien Servicing AG (“Rabobank Settlement”) (Dkt. No. 3959);

WHEREAS, the Court previously appointed Angeion Group, LLC as the Claims Administrator for these two settlements (Dkt. No. 3683; Dkt. No. 3711);

WHEREAS, the Court previously approved Plans of Distribution for these two settlements (Dkt. No. 3668; Dkt. No. 3710);

WHEREAS, the Court has reviewed OTC Plaintiffs' Motion to Authorize Distribution of the MUFG, Norinchukin, and Société Générale Net Settlement Fund; Distribution of the Rabobank, HBOS, Lloyds, Royal Bank of Canada, and Portigon Net Settlement Fund; Supplemental Distribution of the Barclays, Citibank, Deutsche Bank, and HSBC Net Settlement Funds; and Reimbursement of Claims Administration Expenses ("Motion for Distribution");

WHEREAS, the Court has also reviewed the materials accompanying the Motion for Distribution, including the Declaration of Bach-Viet Nguyen, Declaration of Amy Lake, and the Declaration of S. Ilan Guedj and Appendices A and B thereto ("Guedj Declaration");

WHEREAS, these materials detail the steps taken by Rust to distribute the Net Settlement Funds for the Barclays, Citi, Deutsche Bank, and HSBC Settlements; the amounts remaining in each Net Settlement Fund available for a supplemental distribution; the steps and inquiries received by Rust, after the issuance of the Amended Distribution Order, from three claimants whose claims were rejected, in whole or in part, and Rust's investigation of those rejections;

WHEREAS, Class Counsel has recommended that the aforementioned three claimants be provided make-up distributions in the amounts they would have received had their valid claims been included in the Amended Distribution Order, and that all claimants with valid claims, except those claimants who did not cash their prior distributions, receive a supplemental *pro rata* distribution from the Barclays, Citi, Deutsche Bank, and HSBC Net Settlement Funds, as reflected in Appendix A to the Guedj Declaration;

WHEREAS, these materials further detail the steps taken by Angeion and Bates White to process claims submitted to the MUFG and Rabobank Settlements, perform claims validation and quality assurance, and prepare a proposed initial distribution of the Net Settlement Funds for these

settlements, as reflected in Appendix B to the Guedj Declaration and recommended by Class Counsel;

WHEREAS, the Nguyen Declaration and Guedj Declaration list expenses necessarily incurred or to be incurred by Angeion and Bates White, respectively, in connection with the proposed distributions;

NOW, THEREFORE, IT IS HEREBY ORDERED that the instant motion is **GRANTED** as follows:

1. Rust shall distribute supplemental payments to authorized claimants from the Net Settlement Funds of the Barclays, Citi, Deutsche Bank, and HSBC Settlements as proposed by Class Counsel and reflected in Appendix A to the Guedj Declaration.

2. Angeion shall distribute initial payments to authorized claimants from the Net Settlement Funds of the MUFG and Rabobank settlements as proposed by Class Counsel and reflected in Appendix B to the Guedj Declaration.

3. Class Counsel shall be reimbursed \$13,688.75 from each of the Barclays, Citi, Deutsche Bank, and HSBC Net Settlement Funds, for a total of \$54,775, for payment of expenses already incurred by Bates White, and is authorized to reimburse up to \$5,000 from each of these four settlement funds, for a total of \$20,000, for payment of additional expenses, as they are incurred by Bates White, in connection with the make-up and supplemental distribution from these settlements.

4. Class Counsel shall be reimbursed \$834,958.72 from each of the MUFG and Rabobank Net Settlement Funds, for a total of \$1,669,917.44, for payment of expenses already incurred by Angeion and Bates White, and is authorized to reimburse up to \$88,806.42, for a total of \$177,612.84, for payment of additional expenses, as they are incurred by Angeion and Bates White, in connection with the initial distribution from these settlements.

5. Any further claims against the Net Settlement Funds for any of these Settlements are finally and forever barred.

6. OTC Plaintiffs, Class Counsel, Rust, Angeion, Bates White, and all individuals who were involved in the processing and validation of claims, calculation of distributions to claimants, or any other aspect of the claims administration process, are hereby released and discharged from any and all claims arising out of such involvement.

7. The Court retains jurisdiction over any further application or matter which may arise in connection with the administration of these Settlements.

IT IS SO ORDERED on this ____ day of _____, 2025.

Hon. Naomi Reice Buchwald
UNITED STATES DISTRICT JUDGE