UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION	MDL No. 11-md-2262 (NRB)
THIS DOCUMENT RELATES TO:	
The OTC Action	No. 11-cv-5450

OTC PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES, AND INCENTIVE AWARDS

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

PLEASE TAKE NOTICE that, on October 17, 2023, at 11:00 a.m., or such other time as is convenient to the Court and in a format to be determined by the Court, the OTC Plaintiffs will and hereby do move this Court, for the reasons set forth in their Memorandum of Law submitted herewith, for the following relief:

1. Class Counsel shall receive $21,871,993.48 in attorneys' fees, to be paid pro rata out of the settlement fund created by the settlement with Defendants MUFG Bank, Ltd., The Norinchukin Bank, and Société Générale (the "Settlement").

2. Class Counsel shall be reimbursed $2,512,0216.10 in costs and expenses reasonably incurred in the prosecution and settlement of this litigation, to be paid out of the settlement fund created by the Settlement.

3. Each of the OTC Plaintiffs shall be paid a service award equal to $100,000, to be paid out of the settlement fund created by the Settlement.

4. Susman Godfrey L.L.P. and Hausfeld L.L.P. ("Class Counsel") shall have the sole authority to allocate and distribute any attorneys' fees and expenses awarded from the Settlement

pursuant to this order among counsel who performed work on behalf of the OTC Plaintiffs in a manner which, in the opinion of Class Counsel, fairly compensates such counsel for their services.

5. This motion is supported by the OTC Plaintiffs' Memorandum of Law in Support of Motion for Attorneys' Fees, Reimbursement of Litigation Expenses, and Incentive Awards and the Joint Declaration of William C. Carmody and Michael D. Hausfeld. A proposed order is submitted herewith.

Dated: September 8, 2023

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