

**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

[PROPOSED] ORDER APPROVING OTC PLAINTIFFS’ MOTION FOR ATTORNEYS’ FEES, REIMBURSEMENT OF LITIGATION EXPENSES, AND INCENTIVE AWARDS

This matter having come before the Court by way of the OTC Plaintiffs’ Motion for Attorneys’ Fees, Reimbursement of Litigation Expenses, and Incentive Awards, filed September 8, 2023:

IT IS HEREBY ORDERED THAT:

1. Class Counsel shall receive \$21,871,993.48 in attorneys’ fees, to be paid out of the settlement fund created by the settlement with Defendants MUFG Bank, Ltd., The Norinchukin Bank, and Société Générale (the “Settlement”), plus interest on the foregoing amount, accruing from entry of this Order until paid, at the same rate earned by the settlement fund.
2. Class Counsel shall be reimbursed \$2,512,026.10 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, plus interest on the foregoing amount, accruing from entry of this Order until paid, at the same rate earned by the settlement fund.
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.

Dated: _____, 2023

New York, New York

Hon. Naomi Reice Buchwald
UNITED STATES DISTRICT JUDGE