UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION	
THIS DOCUMENT RELATES TO:	No. 1:11-md-2262-NRB
The OTC Action	No. 11-cv-5450

OTC PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF SETTLEMENT WITH DEFENDANTS MUFG BANK, LTD., THE NORINCHUKIN BANK, AND SOCIÉTÉ GÉNÉRALE

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, pursuant to Federal Rule of Civil Procedure 23(e), for an Order: (i) granting final approval of the proposed settlement ("Settlement") reached between OTC Plaintiffs and Defendants MUFG Bank, Ltd. ("MUFG"), The Norinchukin Bank ("Norinchukin"), and Société Générale ("SocGen"), in the above-captioned action; (ii) certifying the Settlement Class; (iii) granting final approval of the Plan of Distribution; (iv) appointing Hausfeld LLP and Susman Godfrey L.L.P. as Settlement Class Counsel, and (v) granting final approval of the Notice Plan, and for such other and further relief as the Court deems appropriate.

Submitted in support of OTC Plaintiffs' Motion for Final Approval of Settlement with MUFG, Norinchukin, and SocGen are: (i) the Memorandum of Law in Support of OTC Plaintiffs' Motion for Final Approval of Settlement with Defendants MUFG, Norinchukin, and SocGen; and

(ii) the Declaration of Steven Weisbrot and Exhibits A-F thereto. OTC Plaintiffs will submit a [Proposed] Order of Final Judgment and Order Granting Final Approval of Settlements with Defendants MUFG, Norinchukin, and SocGen, which will include a list of all Settlement Class member that have requested exclusion from the Settlement Class, in advance of the Final Approval Hearing set for October 17, 2023.

Dated: September 8, 2023

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