

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

IN RE LIBOR-BASED FINANCIAL
INSTRUMENTS ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

The OTC Action

No. 1:11-md-2262-NRB

**OTC PLAINTIFFS' MOTION FOR AN ORDER APPROVING 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**

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 approval of the Notice Plan to Class Members in connection with the settlement reached between OTC Plaintiffs and Defendants Coöperatieve Centrale Raiffeisen-Boerenleenbank B.A. (n/k/a Coöperatieve Rabobank U.A.) ("Rabobank"), Lloyds Banking Group plc, Lloyds Bank plc, HBOS plc, and Bank of Scotland plc (together, "Lloyds"), Royal Bank of Canada ("RBC"), and WestLB AG (n/k/a Portigon AG) and Westdeutsche Immobilienbank AG (n/k/a Westdeutsche Immobilien Servicing AG) (together "Portigon"), in the above-captioned action; and (ii) appointing a Claims Administrator and Escrow Agent.

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