

**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 AND  
REIMBURSEMENT OF LITIGATION EXPENSES**

**TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that, on December 12, 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 \$25,228,596.71 in attorneys’ fees, to be paid out of the settlement fund created by the settlement with Defendants Coöperatieve Centrale Raiffeisen-Boerenleenbank B.A. (n/k/a Coöperatieve Rabobank U.A.), Lloyds Banking Group plc, Lloyds Bank plc, HBOS plc, and Bank of Scotland plc, Royal Bank of Canada, and WestLB AG (n/k/a Portigon AG) and Westdeutsche Immobilienbank AG (n/k/a Westdeutsche Immobilien Servicing AG) (the “Settlement”).

2. Class Counsel shall be reimbursed \$85,613.16 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. 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.

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

Dated: October 27, 2023

By: /s/ Michael D. Hausfeld

Michael D. Hausfeld  
Hilary Scherrer  
Nathaniel C. Giddings  
HAUSFELD LLP  
1700 St. NW, Suite 650  
Washington, D.C. 20006  
Telephone: (202) 540-7200  
Facsimile: (202) 540-7201  
mhausfeld@hausfeldllp.com  
hscherrer@hausfeldllp.com  
ngiddings@hausfeldllp.com

Scott Martin  
HAUSFELD LLP  
33 Whitehall Street  
14th Floor  
New York, New York 10004  
Telephone: 646-357-1195  
Facsimile: 212-202-4322  
smartin@hausfeld.com

Gary I. Smith  
HAUSFELD LLP  
600 Montgomery Street  
Suite 3200  
San Francisco, CA 94111

/s/ William Christopher Carmody

William Christopher Carmody (WC8478)  
Seth Ard (SA1817)  
Geng Chen (GC2733)  
Amy B. Gregory (5663299)  
SUSMAN GODFREY L.L.P.  
1301 Avenue of the Americas, 32nd Fl.  
New York, New York 10019  
Telephone: 212-336-3330  
Facsimile: 212-336-8340  
bcarmody@susmangodfrey.com  
sard@susmangodfrey.com  
gchen@susmangodfrey.com  
agregory@susmangodfrey.com

Marc M. Seltzer (CA State Bar No. 54534)  
Glenn C. Bridgman (CA State Bar No. 270891)  
SUSMAN GODFREY L.L.P.  
1901 Avenue of the Stars  
Los Angeles, California 90067-6029  
Telephone: (310) 789-3100  
mseltzer@susmangodfrey.com  
gbridgman@susmangodfrey.com

Drew D. Hansen (WA State Bar No.: 30467)  
Matthew R. Berry (WA State Bar No.: 37364)

Telephone: 415-633-1908  
Facsimile: 415-633-4980  
GSmith@hausfeld.com

*Counsel for Baltimore, Yale, New Britain,  
Vistra, and Jennie Stuart, and Co-Lead  
Counsel for the OTC Class*

SUSMAN GODFREY LLP  
401 Union Street, Suite 3000  
Seattle, WA 98101  
Telephone: (206) 516-3880  
Facsimile: (206) 516-3883  
Email: dhansen@susmangodfrey.com  
mberry@susmangodfrey.com

Barry C. Barnett (BB1984)  
Karen A. Oshman (TX State Bar No.:  
15335800)  
Michael C. Kelso (TX State Bar No.:  
24092617)  
SUSMAN GODFREY L.L.P.  
1000 Louisiana Street  
Suite 5100  
Houston, TX 77002-5096  
Telephone: (713) 651-9366  
Facsimile: (713) 654-6666  
bbamett@susmangodfrey.com  
koshman@susmangodfrey.com  
mkelso@susmangodfrey.com

*Counsel for Baltimore, Yale, New Britain,  
Vistra, and Jennie Stuart, and Co-Lead  
Counsel for the OTC Class*