

**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 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**

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 Cooperatieve Centrale Raiffeisen-Boerenleenbank B.A. (n/k/a Cooperatieve Rabobank U.A.) (“Rabobank”), Lloyds Banking Group plc, Lloyds Bank plc, HBOS plc, and Bank of Scotland (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; (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 Rabobank, Lloyds, RBC, and Portigon are: (i) the Memorandum of Law in Support of OTC Plaintiffs' Motion for Final Approval of Settlement with Defendants Rabobank, Lloyds, RBC, and Portigon; and (ii) the Declaration of Steven Weisbrot and Exhibits A-G thereto. OTC Plaintiffs will submit a [Proposed] Order of Final Judgment and Order Granting Final Approval of Settlements with Defendants Rabobank, Lloyds, RBC, and Portigon, 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 December 12, 2023.

Dated: October 27, 2023

By: /s/ Michael D. Hausfeld

Michael D. Hausfeld
Hilary Scherrer
Nathaniel C. Giddings
HAUSFELD LLP
888 16th St., Suite 300
Washington, D.C. 20006
Telephone: (202) 540-7200
Facsimile: (202) 540-7201
mhausfeld@hausfeld.com
hscherrer@hausfeld.com
ngiddings@hausfeld.com

Gary I. Smith, Jr.
HAUSFELD LLP
600 Montgomery Street
Suite 3200
San Francisco, CA 94111
Telephone: 415-633-1908
Facsimile: 415-633-4980
gsmith@hausfeld.com

/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

Scott Martin
HAUSFELD LLP
33 Whitehall Street, 14 Fl.
New York, NY 10004
Telephone: 646-357-1100
smartin@hausfeld.com

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

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)
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*