

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STEPHEN SULLIVAN, WHITE OAK FUND LP,
CALIFORNIA STATE TEACHERS' RETIREMENT
SYSTEM, SONTERRA CAPITAL MASTER FUND,
LTD., FRONTPOINT PARTNERS TRADING
FUND, L.P., AND FRONTPOINT AUSTRALIAN
OPPORTUNITIES TRUST on behalf of themselves
and all others similarly situated,

Docket No. 13-cv-02811 (PKC)

Plaintiffs,

- against -

BARCLAYS PLC, BARCLAYS BANK PLC, BARCLAYS
CAPITAL INC., BNP PARIBAS S.A., CITIGROUP,
INC., CITIBANK, N.A., COÖPERATIEVE
CENTRALE RAIFFEISEN-BOERENLEENBANK
B.A., CRÉDIT AGRICOLE S.A., CRÉDIT AGRICOLE
CIB, DEUTSCHE BANK AG, DB GROUP SERVICES
UK LIMITED, HSBC HOLDINGS PLC, HSBC BANK
PLC, ICAP PLC, ICAP EUROPE LIMITED, J.P.
MORGAN CHASE & CO., JPMORGAN CHASE
BANK, N.A., THE ROYAL BANK OF SCOTLAND
PLC, SOCIÉTÉ GÉNÉRALE SA, UBS AG AND JOHN
DOE NOS. 1-50,

Defendants.

STATE OF FLORIDA)
) ss.
PALM BEACH COUNTY)

AFFIDAVIT OF ERIC J. MILLER ON BEHALF OF A.B. DATA, LTD.
REGARDING REQUESTS FOR EXCLUSION

I, Eric J. Miller, being duly sworn, certify as follows:

1. I am the Vice President of Client Services of A.B. Data, Ltd.'s Class Action Administration Division ("A.B. Data"). I am over 21 years of age and am not a party to this Action. My business address is 3507 Kyoto Gardens Drive, Suite 200, Palm Beach Gardens, FL 33410, and my telephone number is 561-336-1801. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. This affidavit reports on the opt-out list identifying all Persons who submitted a timely Request for Exclusion from the Settlement Class as required by Paragraph 35 of the Order Preliminarily Approving Proposed Settlements with Deutsche Bank AG and DB Group Services (UK) Ltd., Scheduling Hearing for Final Approval of Proposed Settlements with Barclays plc, Barclays Bank plc, Barclays Capital, Inc., HSBC Holdings plc, HSBC Bank plc, Deutsche Bank AG and DB Group Services (UK) Ltd., and Approving the Proposed Form and Program of Notice to the Class, signed on July 5, 2017 (ECF No. 364) (the “Preliminary Approval Order”).¹

3. Pursuant to Paragraph 30 of the Preliminary Approval Order and Section III.C. of the Mailed Notice (ECF No. 384-1, at 17), those members of the Settlement Class requesting exclusion were to provide the following information: (i) the name, address, and telephone number of the Settlement Class Member; (ii) a list of all trade names or business names that the Settlement Class Member requests to be excluded; (iii) the name of the Action (“*Sullivan v. Barclays PLC et al.*, No. 13-cv-2811 (PKC) (S.D.N.Y.)”); (iv) a statement certifying such person is a Settlement Class Member; (v) a description of the Euribor Products transactions entered into by the Settlement Class Member that fall within the Settlement Class definition (including, for each transaction, the identity of the broker, the date of the transaction, the type (including direction) of the transaction, the counterparty (if any), the exchange on which the transaction occurred (if any), any transaction identification numbers, the rate, and the notional amount of the transaction); and (vi) a statement that “I/we hereby request that I/we be excluded from the Settlement Class in *Sullivan v. Barclays PLC et al.*, No. 13-cv-2811 (PKC) (S.D.N.Y.)” All written requests must have been signed by the Settlement Class Member (or his, her or its legally authorized representative), notarized, and sent by United States First-Class Mail postmarked no later than April 13, 2018 (the “Exclusion Bar Date”).

¹ Unless otherwise defined herein, all capitalized terms used herein shall have the meanings set forth in the Preliminary Approval Order, the Notice, and/or the Settlement Agreements.

4. By this Court's Order Extending the Request for Exclusion Deadline in connection with Plaintiffs' Class Action Settlements with Barclays plc, Barclays Bank plc, Barclays Capital, Inc., Deutsche Bank AG and DB Group Services (UK) Ltd., HSBC Holdings plc, and HSBC Bank plc, dated April 12, 2018 (ECF No. 416), the Exclusion Bar Date was extended from April 13, 2018 to April 20, 2018.

5. Pursuant to Paragraphs 33 and 35 of the Preliminary Approval Order, A.B. Data promptly logged each Request for Exclusion that it received and provided copies of the log and all documents submitted with each Request for Exclusion to Class Counsel, Barclays' Counsel, Deutsche Bank's counsel, and HSBC's counsel.

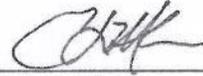
6. A.B. Data received six Requests for Exclusion from the Settlement Class on or before April 20, 2018. Attached hereto as Exhibit A is a summary report of the six exclusions from potential Settlement Class Members received as of the date of this Affidavit.

7. Pursuant to Paragraph 25 of the Preliminary Approval Order and Section III.B. of the Mailed Notice, those members of the Settlement Class who wished to object to any aspect of the Settlements, application for attorneys' fees and expenses, or the Final Approval Order and Final Judgment were to file such objection with the Court and serve on Class Counsel and counsel of record for Barclays, Deutsche Bank, and HSBC no later than April 13, 2018.

8. As of the date of this Affidavit, A.B. Data has not received any objections to the Settlements and A.B. Data knows of no objections sent to Class Counsel or counsel for Barclays, Deutsche Bank, and HSBC.

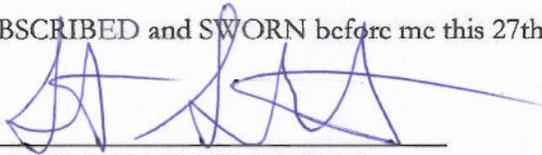
I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27th day of April 2018.



Eric J. Miller

SUBSCRIBED and SWORN before me this 27th day of April 2018.



STEVEN STRAUB, Notary Public
My commission expires May 18, 2020.



EXHIBIT A

Euribor Litigation
Exclusion Report

Name	Exclusion ID #	Postmark	Timely?	Contact information?	Name of Action?	Statement that Class Member?	Transactions Statement?	Exclusion Statement?	Signed?	Notarized?
1. Raymond Wang	47641157	1/17/2008	Y	Y	Y	Y	N	Y	Y	N
2. Akira Kusakawa	47641168	1/19/2008	Y	Y	N	N	N	Y	Y	N
3. Paul Littlefield	47641225	3/12/2018	Y	N	Y	N	N	Y	N	N
4. Banco de la Nación del Peru	47647154	3/13/2018	Y	Y	Y	N	N	Y	Y	Y
5. Helmut Specht	47647155	4/8/2018	Y	Y	Y	N	Y	Y	Y	N
6. Hendrik (Henk) de Rijck	47647156	4/19/2018	Y	Y	N	N	N	Y	N	N