



LOWEY DANNENBERG, P.C.

July 24, 2023

VIA ECF

The Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Sullivan et al. v. Barclays PLC et al.*, No. 13-cv-2811 (PKC) (S.D.N.Y.)

Dear Judge Castel:

We represent Plaintiffs in the above-referenced action and serve as Class Counsel in connection with the proposed class action settlement with Defendant Société Générale. Pursuant to Section 1.C. of your Honor's Individual Practices in Civil Cases, we write to request a three-week extension of certain deadlines relating to the final approval of the Société Générale settlement and an adjournment of the Settlement Hearing.

Court-appointed Claims Administrator, A.B. Data, implemented a multifaceted notice plan that included, among other things, directly mailing the class notice and proof of claim and release form (together the "Notice Packet") to market participants, A.B. Data's proprietary list of banks, brokers, and nominees, and the prior settling defendants' counterparties; advertising notice of the settlement in media including *The Wall Street Journal*, *Investor's Business Daily*, and *Financial Times*, among others; publishing banner advertisements on investing-related websites; and distributing a news release via *PR Newswire* to thousands of news outlets and social media accounts. *See* ECF No. 572. As of June 27, 2023, the Claims Administrator mailed over 156,170 Notice Packets to potential Class Members, and the noticing agents for the prior settling defendants separately distributed another 21,088 Notice Packets. *See* ECF No. 570, at 21.

Société Générale recently advised that it has not finished mailing the Notice Packet to its counterparties due to certain technical difficulties. As of July 21, 2023, Société Générale's noticing agent mailed the Notice Packets to approximately 9,800 potential Class Members whose contact information could not be provided by Société Générale to the court-appointed Claim Administrator due to foreign legal restrictions.¹ Based on our experience, Class Counsel anticipate that these mailings will largely duplicate the Claims Administrator's efforts. Nevertheless, given the approaching request for exclusion and objection deadlines (July 27, 2023 and August 3, 2023, respectively), we respectfully request a three-week extension of the remaining deadlines relating to final approval of this Settlement, as follows:

¹ Société Générale also informed Class Counsel that it recently located addresses for a smaller set of counterparties to which Société Générale will send Notice Packets as soon as possible.



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DEADLINE	CURRENT DEADLINE	NEW DEADLINE
Last Day to File Exclusion Requests:	July 27, 2023	August 17, 2023
Last Day to File Objections:	August 3, 2023	August 24, 2023
Last Day to File Declaration on Opt-Outs	August 8, 2023	August 29, 2023
Last Day to Complete Discovery Related to Any Objections and Last Day to Oppose Any Objections:	August 28, 2023	September 18, 2023
Last Day to File Reply to Motion for Final Approval	August 28, 2023	September 18, 2023
Settlement Hearing	September 7, 2023	On or after <i>Oct 31, 2023</i> September 28, 2023 <i>at 3 pm</i>
Last Day to File Proof of Claim	October 9, 2023	30 days after the Settlement Hearing

OK

This is Plaintiffs' first request for an extension of the schedule relating to this Settlement. Société Générale consents to this request.

We thank the Court for its attention to this matter.

Respectfully,

/s/ Vincent Briganti
 Vincent Briganti
 Lowey Dannenberg, P.C.

/s/ Christopher Lovell
 Christopher Lovell
 Lovell Stewart Halebian Jacobson LLP

cc: All Counsel of Record (via ECF)

The New Deadlines are adopted with the fairness hearing scheduled for October 31, 2023 at 3pm SO ORDERED
[Signature]
 7-27-23