



LOWEY DANNENBERG, P.C.

September 2, 2022

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

Dear Judge Castel:

We are counsel for Plaintiffs in the above-captioned action. In accordance with the Court's May 9, 2022 Order (ECF No. 520) at ¶30, enclosed please find the Supplemental Declaration of Steven Straub on Behalf of A.B. Data, Ltd. Regarding Report on Requests for Exclusion (the "Opt-Out List").

We are pleased to report that no objections to the Settlement or to the Fee and Expense Application have been filed.

Respectfully submitted,

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

/s/ Christopher Lovell
Lovell Stewart Halebian Jacobson LLP

cc: All Counsel of Record (via ECF)

**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,

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.

Docket No. 13-cv-02811 (PKC)

**SUPPLEMENTAL DECLARATION OF STEVEN STRAUB ON BEHALF OF
A.B. DATA, LTD. REGARDING REPORT ON REQUESTS FOR EXCLUSION**

Pursuant to 28 U.S.C. §1746, I, Steven Straub, declare:

1. I am Claimant Operations Director of A.B. Data, Ltd.'s Class Action Administration Company ("A.B. Data"). I am over 21 years of age and am not a party to the above-captioned action (the "Action"). My business address is 600 A.B. Data Drive, Milwaukee, WI 53217. A.B. Data was authorized to act as the Claims Administrator in connection with the

settlement in the Action.¹ I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. I submit this Declaration to supplement my earlier declaration, the Declaration of Steven Straub on Behalf of A.B. Data, Ltd. Regarding Notice Administration, dated August 9, 2022 (ECF No. 527) (the “Initial Mailing Declaration”), which provided the Court with information regarding the implementation of the notice plan.

TELEPHONE HELPLINE AND WEBSITE

3. A.B. Data continues to maintain the toll-free telephone number (1-800-492-9154) and interactive voice response system to accommodate any inquiries from potential Class Members with questions about the Action and the Settlement.

4. A.B. Data also continues to maintain the settlement website (www.EuriborSettlement.com) and an email address (info@EuriborSettlement.com) to assist Class Members. The website provides information on, among other things, the exclusion, objection, and claims-filing deadlines, the date and time of the Fairness Hearing, general information regarding the case and its current status, the Distribution Plan and instructions for submitting a claim, and provides answers to frequently asked questions. On August 12, 2022, A.B. Data posted to the website copies of the papers filed in support of Class Plaintiffs’ motion for final approval of the Settlement and Class Counsel’s motion for an award of attorneys’ fees and expenses.

5. A.B. Data will continue maintaining and, as appropriate, updating the website and toll-free telephone number until the conclusion of the administration.

¹ Unless otherwise noted, capitalized terms not defined herein have the same meaning as in the Mailed Notice and the Stipulation and Agreement of Settlement between Plaintiffs and Crédit Agricole dated March 10, 2022 (the “Settlement Agreement”). ECF No. 518-1.

REPORT ON REQUESTS FOR EXCLUSION RECEIVED

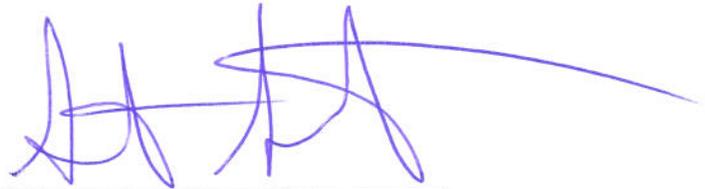
6. The Class Notice informed potential members of the Class that Requests for Exclusion from the Class were to be postmarked no later than August 23, 2022. A.B. Data received three (3) potentially valid Requests for Exclusion. Attached hereto as Exhibit A is a summary report of those Requests for Exclusion. No additional Requests for Exclusion have been received as of the date of this Declaration.

REPORT ON OBJECTIONS

7. The Class Notice also informed potential Class Members that objections to the fairness, reasonableness, or adequacy of any term or aspect of the Settlement, Fee and Expense Application, Incentive Awards, or the Final Order and Judgment were to be filed with the Court and served on Class Counsel and Counsel for Crédit Agricole no later than August 30, 2022. As of the date of this Declaration, A.B. Data has not received any objections to the Settlement and knows of no other objections sent to Class Counsel or Crédit Agricole's Counsel.

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

Executed this 2nd day of September 2022.



Steven Straub

EXHIBIT A

Euribor Litigation
Exclusion Report

Name	Exclusion ID #	Postmark	Timely?	Contact Information?	Name of Action?	Class Member Statement?	Transaction(s) Statement?	Exclusion Statement?	Signed?	Notarized?
1. Akira Kusakawa	47647167	7/2/2022	Y	Y	N	N	N	Y	Y	N
2. Erez Wasserman	47647168	8/6/2022	Y	N	N	N	N	Y	Y	N
3. Zuzana Kostova	47647169	8/12/2022	Y	Y	Y	N	N	Y	Y	N