

**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)

**DECLARATION OF LINDA P. NUSSBAUM IN SUPPORT OF  
CLASS COUNSEL'S MOTION FOR AWARD OF ATTORNEYS' FEES AND  
REIMBURSEMENT OF EXPENSES**

I, Linda P. Nussbaum, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I am the Managing Director of Nussbaum Law Group, P.C. (“NLG”) The statements herein are true to the best of my personal knowledge, information and belief based on the books and records of NLG and information received from its attorneys and staff.
2. NLG serves as additional Plaintiffs’ counsel for the putative class in the above-captioned action.
3. I respectfully submit this declaration in support of Class Counsel’s Motion for Award of Attorneys’ Fees and Reimbursement of Expenses and seek attorneys’ fees and reimbursement of expenses in this Action.
4. During the course of this litigation, and as detailed herein, NLG worked on assignments that it was specifically directed to perform by Class Counsel, Lowey Dannenberg, P.C. and Lovell Stewart Halebian Jacobson LLP.
5. Set forth below are NLG’s legal services rendered in this litigation, the lodestar value of those services and the expenses reasonably incurred by the firm in connection with this litigation for which reimbursement is requested.
6. Among the services NLG performed on behalf of the putative class in connection with the prosecution of the litigation include, but are not limited to, the following: assistance in general research and discovery matters, legal and factual research, analysis of documents provided by defendants, and memos to lead counsel with respect to those documents.
7. The schedule in ¶ 8 below is a summary reflecting the amount of time spent by the attorneys and professional support staff of NLG involved in this litigation from (1) inception to February 28, 2019, and (2) from March 1, 2018 to February 28, 2019, as well as the lodestar calculations for both periods based on the firm’s current hourly billing rates. The schedule was prepared based upon daily time records maintained by attorneys and professional support staff at

NLG. The schedule in ¶ 11 below reflects the expenses incurred by the firm in its representation of the putative class in this litigation from March 1, 2018 through present. The hourly billing rate for any timekeeper primarily involved in first-level document review has been capped at \$350/hour and, except for work relating to service as allocation counsel, the charges for timekeepers with less than 15 hours billed in this Action, unless they were doing work at the specific request of lead counsel, have been excluded.

8. NLG's total fee compensable time for which it seeks an award of attorneys' fees is summarized as follows.

Attorneys	Role <sup>1</sup>	Hourly Rate	Hours from Inception to 2/28/2019	Lodestar from Inception to 2/28/2019	Hours from 3/1/2018 to 2/28/2019	Lodestar from 3/1/2018 to 2/28/2019
Linda P. Nussbaum	P	\$995	16.7	\$16,616.50	1.0	\$995.00
Peter Moran	A	\$350	39.8	\$13,930.00	0.0	\$0.00
Hoyoung Yang	A	\$425	36.1	\$15,342.50	36.1	\$15,342.50
Ivan Dodeles	CL	\$350	181.0	\$63,350.00	149.5	\$52,325.00
Josh Alpert	CL	\$350	194.0	\$67,900.00	0.0	\$0.00
<b>TOTALS</b>			467.6	\$177,139.00	186.6	\$68,662.50

9. Thus, the total time for which my firm is requesting an award of legal fees is 467.6 hours. The total lodestar value of these professional services is \$177,139.00.

10. The above hourly rates for NLG's attorneys and professional support staff are the firm's current hourly rates. The firm's lodestar figures do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in the firm's current billing rates. Further, expense items do not contain any general overhead costs and do not contain a surcharge over the amount paid to the corresponding vendor(s).

<sup>1</sup> "P" refers to Partners. "S" refers to Shareholders. "C" refers to Counsel, "A" refers to Associates. "AA" refers to law graduates who are awaiting admission. "LC" refers to Law Clerks. "OC" refers to Of Counsel. "PL" refers to Paralegals. "LA" refers to Legal Assistants. "CL" refers to Contract Lawyers.

11. As detailed and categorized in the below schedule, NLG has incurred a total of \$30.05 in expenses from March 1, 2018 to present for which it is currently requesting reimbursement.

Expense Categories	Cumulative Expenses
Computer Research, Databases & Docket	\$2.05
Conferences, Meetings, Telephone, & Telecopier	\$28.00
<b>TOTAL</b>	<b>\$30.05</b>

12. The above schedule was prepared based upon expense records reflected in the books and records of NLG. These books and records are prepared from expense vouchers, check records, receipts and other source materials.

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

Executed on March 18, 2019

