

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)  
ECF Case

**NOTICE OF MOTION FOR AN ORDER PRELIMINARILY  
APPROVING PLAN OF DISTRIBUTION  
FOR SETTLEMENTS WITH DEFENDANTS  
BARCLAYS, HSBC, AND DEUTSCHE BANK**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

PLEASE TAKE NOTICE that the undersigned, attorneys for Plaintiffs in the above-referenced matter, will move this Court before the Honorable P. Kevin Castel, United States District Judge for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by this Court, for an order pursuant to Rule 23(e) of the Federal Rules of Civil Procedure preliminarily approving a Plan of Distribution of the settlement funds.

Submitted herewith in support of Plaintiffs' motion are: (i) the Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Plan of Distribution for Settlements with Defendants Barclays, HSBC and Deutsche Bank; (ii) the Declaration of Gary S. Jacobson, Esq., together with exhibits; (iii) the Declaration of Kenneth R. Feinberg, Esq., together with an exhibit; and (iv) a [Proposed] Order Preliminarily Approving Plan of Distribution.

Dated: January 8, 2018

**LOVELL STEWART HALEBIAN  
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By: /s/ Christopher Lovell

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**LOWEY DANNENBERG, P.C.**

By: /s/ Vincent Briganti

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