

# **EXHIBIT 2**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

STEPHEN SULLIVAN, et al. on behalf of  
themselves and all others similarly situated,

Plaintiffs,

– against –

BARCLAYS PLC, et al.,

Defendants.

Docket No.: 13-cv-02811 (PKC)

**DECLARATION OF ELAINE PANG**

Pursuant to 28 U.S.C. §1746, I, Elaine Pang, declare:

1. I am the Vice President of Media with A.B. Data, Ltd.’s Class Action Administration Company (“A.B. Data”). I submit this Declaration at the request of Interim Lead Counsel in connection with the proposed settlement (the “Settlement”) of the above-captioned action (the “Action”). This Declaration is based upon my personal knowledge and information provided by Interim Lead Counsel, my associates, and A.B. Data staff members.

2. A.B. Data has been appointed as notice, claims, and/or settlement administrator in hundreds of large consumer, antitrust, securities, ERISA, insurance, and government agency matters. A profile of A.B. Data’s background and capabilities is included as Exhibit A.

3. I have personally developed and directed some of the largest and most complex notification plans in the United States and internationally. The scope of my work includes notification plans in securities, antitrust, consumer & product liability, bankruptcy, ERISA, and insurance settlements. I have developed or consulted on more than 100 notification plans, placing millions of dollars’ worth of media notice. My curriculum vitae is attached as Exhibit B.

4. This Declaration details a plan, attached as Exhibit C, designed to notify potential Class Members of the Settlement reached in this action (the “Proposed Notice Plan”). The Settlement Class is defined as:

All Persons who purchased, sold, held, traded, or otherwise had any interest in Euribor Products<sup>1</sup> from June 1, 2005, through and including March 31, 2011, who were either domiciled in the United States or its territories or, if domiciled outside the United States or its territories, transacted in Euribor Products in the United States or its territories from June 1, 2005, through and including March 31, 2011, including, but not limited to, all Persons who traded CME Euro currency futures contracts, all Persons who transacted in NYSE LIFFE Euribor futures and options from a location within the United States, and all Persons who traded any other Euribor Product from a location within the United States. Excluded from the Settlement Class are the Defendants and any parent, subsidiary, affiliate, or agent of any Defendant or any co-conspirator whether or not named as a Defendant, and the United States Government.

5. The Proposed Notice Plan is substantially similar to the Notice Plans previously approved by the Court in this case and includes direct notice via First-Class Mail, digital and print paid media advertisements in financial publications and websites, targeted digital advertising, and earned media via a national press release.

#### **Direct Mail**

6. Direct mail notice will be sent to derivatives market participants, including:
- members of the International Swaps and Derivatives Association (“ISDA”), a global trade association for OTC derivatives responsible for maintaining the standardized ISDA Master Agreement used in OTC Euribor Products transactions;

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<sup>1</sup> “Euribor Products” means any and all interest rate swaps, forward rate agreements, futures, options, structured products, and any other instrument or transaction related in any way to Euribor, including but not limited to, NYSE LIFFE Euribor futures contracts and options, CME Euro currency futures contracts and options, Euro currency forward agreements, Euribor-based swaps, Euribor-based forward rate agreements, and/or any other financial instruments that reference Euribor.

- senior executives at hedge funds, investment banks, and real-estate companies – the commercial end-users of OTC Euribor Products;
- financial executives, including pension-fund managers and derivatives traders, responsible for managing Euro exposure;
- individual traders and brokers who have transacted in the Euro market during the Class Period;
- the CME’s list of large traders, including those who transacted in Euro currency futures contracts; and
- a proprietary list of banks, brokers, and other investors. This list is several times larger than the anticipated number of OTC Euribor Products market participants and should effectively reach a large percentage of the Class.

Société Générale will also be providing contact information for its counterparties that transacted in Euribor Products, consistent with the obligations set forth in its Settlement Agreement and relevant foreign bank secrecy and/or customer confidentiality laws that may restrict their ability to provide counterparty-identifying information to third parties. Notice will also be sent to the Euribor Products counterparties of Barclays plc, Barclays Bank plc, Barclays Capital Inc., Citigroup, Inc., Citibank, N.A., Crédit Agricole S.A., Crédit Agricole CIB, Deutsche Bank AG, DB Group Services (UK) Ltd., HSBC Holdings plc, HSBC Bank plc, JPMorgan Chase & Co., JPMorgan Chase Bank, N.A. (collectively, the “Settling Defendants”), and the dismissed Defendants, to the extent that contact information was previously obtained via discovery and/or settlement cooperation.

### **Print Media**

7. A summary publication notice will be placed as an ad in each of the following publications:

- *Wall Street Journal*
- *Investor's Business Daily*
- *Financial Times*
- *Barron's*
- *Stocks & Commodities*
- *Hedge Fund Alert*
- *Grant's Interest Rate Observer*
- *EuroMoney*

### **Digital Media**

8. Banner ads will appear on targeted financial websites such as marketplace.com, cnbc.com, finance.yahoo.com, and hundreds of others. A 30-day banner ad campaign will run on the GlobalCapital.com website. Ads will be served across multiple devices, including desktop, tablet, and mobile devices. They will be placed in premium positioning on websites ensuring that they can be easily seen when viewers first open website pages. Internet advertising allows the viewer to click on a banner advertisement and instantly be directed to the Settlement website.

9. The banner ad campaign will run for 30 days to ensure ample time to deliver the targeted impressions. At least 18 million impressions will be delivered to the target audience. All banner ads will include an embedded link to the Settlement website.

### **Social Media**

10. To drive engagement with potential Class Members, newsfeed ads will be purchased on LinkedIn. These ads will be microtargeted to individuals who have expressed an interest in information relevant to the trading of Euribor Products and ISDA members.

### **Google AdWords/Search**

11. Sponsored search listings will be placed through the Google search engine. When identified target phrases and keywords are used in searches on Google, links to the Settlement website will appear at the top of the search result pages. Representative keywords will include terms such as “Euribor derivatives,” “Euribor markets,” and “ISDA trading.”

### **Earned Media**

12. To supplement direct notice, a news release will be disseminated via *PR Newswire*'s US1 distribution list. This news release will be distributed via *PR Newswire* to the news desks of approximately 10,000 newsrooms, including those of print, broadcast, and digital websites across the United States.

### **Toll-Free Telephone Number**

13. A.B. Data will maintain a case-specific toll-free telephone number to address potential Class Member inquiries. The toll-free telephone number will be equipped with an automated interactive voice response system that will present callers with a series of choices to hear prerecorded information. If callers need further help, they will have an option to speak with a live operator during business hours.

### **Case Website**

14. A dedicated informational case website, [EuriborSettlement.com](http://EuriborSettlement.com), has been operating since the first settlement in this case. The case website will be used to complement the

Proposed Notice Plan and continue to provide Class Members with easy access to updated information about the Action and the Settlement. The website provides, among other things, a summary of the case and Class Member's rights and options, relevant documents, important dates, and any pertinent updates concerning the Action. A.B. Data also maintains an official e-mail account that Class Members can utilize to ask questions.

### **Form and Content of Notice**

15. A detailed Mailed Notice will be used for direct mail notice and will be available on the Settlement website. A Summary Publication Notice will be used to provide notice via the print publications and press release, as described in detail above. The Summary Publication Notice will also be emailed to Class Members that previously filed a Proof of Claim and Release in connection with earlier settlements to advise them of the settlement with Société Générale. Both notices will include detailed information about the Action and the Settlement, including: the definition of the Settlement Class in plain and engaging language; the allegations and claims made by Plaintiffs on behalf of the Settlement Class; how a Class Member may appear through an attorney (at their own expense) if the Class Member desires; how Class Members can request to exclude themselves from this Settlement; the time and manner for requesting exclusion; and the binding effect of any judgment on Class Members.

16. The banner advertisements will be developed to draw attention and encourage recipients to click through to the Settlement website. An example banner ad is included in the Proposed Notice Plan. Each form of notice is well-organized and written in a reader-friendly, plain-English format for easy readership and comprehension.

**Conclusion**

17. It is my opinion that the Proposed Notice Plan described herein is adequate and reasonable and will effectively reach members of the Settlement Class. This Proposed Notice Plan conforms to the standards employed by A.B. Data in similar notification plans designed to reach groups or classes that trade in futures, securities, and commodities. The Proposed Notice Plan as designed is fully compliant with Rule 23 of the Federal Rules of Civil Procedure.

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

Executed this 13th day of April, 2023.

A handwritten signature in black ink, appearing to read 'E. Pang', with a long horizontal stroke extending to the right.

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Elaine Pang

# EXHIBIT A

**Class  
Action  
Administration**



**Headquarters**

600 A.B. Data Drive  
Milwaukee, WI 53217  
P: 866-217-4470  
F: 414-961-3099

**New York**

One Battery Park Plaza  
32<sup>nd</sup> Floor  
New York, NY 10004  
P: 646-290-9137

**Washington DC**

915 15<sup>th</sup> St., NW, Ste. 300  
Washington, DC 20005  
P: 202-618-2900  
F: 202-462-2085

**Florida**

5080 PGA Boulevard, Ste. 209  
Palm Beach Gardens, FL 33418  
P: 561-336-1801  
F: 561-252-7720

**Israel**

19 Weissburg Street  
Tel Aviv 69358  
Israel  
P: +972 (3) 720-8782



# CAPABILITIES

## About A.B. Data

 Founded in 1981, **A.B. Data has earned a reputation** for expertly managing the complexities of class action administration in consumer, antitrust, securities, Securities and Exchange Commission (SEC) enforcement actions, and ERISA, Attorneys General, employment, civil rights, insurance, environmental, wage and hour, and other class action cases. **A.B. Data's work in all aspects of class action administration** has been perfected by decades of experience in hundreds of class action cases involving billions of dollars in total settlements. Dedicated professionals deliver **A.B. Data's all-inclusive services**, working in partnership with its clients to administer their class action cases effectively, efficiently, and affordably, regardless of size or scope.

**A.B. Data offers unmatched resources and capacity** and is capable of expertly administering any class action notice, settlement, and/or fund administration. Whether notifying millions of class members in the United States or throughout the world, processing millions of claims, distributing payments digitally via A.B. Data's Digital PayPortal<sup>SM</sup>, or printing and distributing millions of checks, **A.B. Data matches its talent and technology** to the specific needs of its clients, delivering unparalleled service on time and on budget without ever compromising quality.

## Location, Ownership Structure

 **A.B. Data is an independently owned**, more than 40-year-old, Milwaukee, Wisconsin-based company that prides itself on its vast expertise and industry-leading innovations. We like to remind our clients and partners that we're not just a class action administration company, but a group of experienced, dedicated professionals who believe that relationships are just as important as the accurate and timely management of class action administrations. In other words, we are people who do business with people.

## Services

 **Every A.B. Data client is deserving of the best job we can put forward.** A.B. Data makes class action administration easy for our clients with clarity, convenience, and efficiency. Our priority is to navigate the intricacies of our clients' matters and deliver successful results by using our solid expertise, advanced technology, and top-quality products and services. We pay attention to the details and get it right the first time.

We aim to provide our clients the full experience of a truly collaborative working relationship. It is why we believe much of our success originates from our philosophy of "people doing business with people."

## Services

### All Digital — From Notice to Distribution

**A.B. Data is uniquely positioned to design, implement, and maintain notice and settlement administration programs** using an innovative, "all-digital" approach that replaces the more traditional and less efficient methods of administration, such as newspaper ads, mailed notices, and paper checks. Many of our recent proposed notice plans and claim programs utilize the latest technologies such as microtargeted digital ads for notice, streamlined online claims, and distributing settlement funds electronically using a digital paywall. These methods provide significant cost savings, are consistent with the amendments to Rule 23 that are now in effect, and importantly provide much-needed alignment of class action notice and administration with current consumer behaviors.

### Pre-Settlement Consultation

**The pre-settlement consultation is a collaborative session** designed to help A.B. Data clients prepare a stronger case. Our support teams simplify the task of sorting through a maze of documents during investigation and discovery, streamlining the process and preserving fund assets. From there, we assist with fully interactive media packages for court presentations and settlement negotiations. A.B. Data works closely with our clients, offering expert testimony on documents, processing, class and notice manageability, and proposed plans of allocation.

### Media Services

**A.B. Data continues to earn our reputation** as the early innovator in integrating advanced micro-targeting techniques, including contextual targeting, behavioral targeting, and predictive modeling. Coupled with inventive digital media strategies to drive claims, case-specific banner ad development, class member research, and comScore analysis services, our multi-tiered media programs are designed to cost-effectively deliver notice to potential class members and increase claims rates.

### Notice Administration

**In A.B. Data, clients have a comprehensive resource** with a depth of experience in direct notice. Our compliance and understanding of Rule 23 of the Federal Rules of Civil Procedure are crucial in meeting the "plain language" legal requirements for any campaign. From our sophisticated digital media capabilities and extensive global experience with class member research, our experts create notice documents that are easily understandable and cost-efficient to produce. We consult with our clients to deliver notice documents from multi-page, mailed, or emailed notice packets to concise postcards that establish the most influential and cost-effective means of communicating with potential claimants.

## Claims Processing

**A.B. Data continues to bring game-changing technologies** to improve the speed and precision in claims processing. Our robust system for online claims submissions allows us to meticulously verify data and documentation, preserve and authenticate claims, and calculate and verify settlement amounts. In addition, our data network infrastructure includes on-site data storage, backup, contingency plans, and security for electronic and hard copy claim filings. It is all part of a total commitment to be the most innovative and comprehensive resource in the industry. At A.B. Data, we take pride in having the in-house capacity to process millions of pages, as well as the organizational integrity to treat every claim as if it were the only one.

## Contact Center

**A.B. Data's Contact Center is comprised of a full staff** that is trained on and equipped with online and telecommunication systems to monitor and connect with class members. Associates routinely monitor class member communication for all class action administrations, including antitrust, consumer, and securities.

Utilizing monitoring software, associates watch multiple social media channels simultaneously, allowing for instantaneous routing of inquiries and interaction with claimants. Detailed and concise analytical reports outlining Contact Center activities are always provided.

Our Contact Center and case websites are capable of handling millions of class member engagements, as recently displayed in a campaign which garnered over 1.2 million website visits in two months and had more than 72,500 Facebook engagements. Facebook comments and threads are monitored and claimants are guided to the website for more information. Google AdWords and display advertising have also brought hundreds of thousands of visitors to various case websites.

A.B. Data's Contact Center also has Spanish language associates in-house and we can accommodate any language, given proper lead time. Traditional call center facilities are also available, if needed.

## Case Websites

**We offer a state-of-the-art technology platform** that supports every step of our class action administration process. Our expert marketing professionals design customized case-specific websites that provide potential class members easy access to case information, critical documents, important deadlines, as well as the capability to file claim forms and register for future mailings about the case. Claimants can use the website to elect to receive their settlement payments by mail or by one of several digital payment options, all accessible by mobile devices.

## Settlement Fund Distribution

**From complete escrow services to establishment of qualified settlement funds**, check printing and mailing, electronic cash or stock distribution and tax services, A.B. Data has always provided a full-service solution to Settlement Fund Distribution. Our IT team has decades of experience in developing and implementing fast, secure databases and claims administration systems that ensure class members receive the correct amount in their settlement disbursement. Today's digital capabilities allow even greater convenience for class members. In certain instances, claimants can now elect to

instantaneously receive settlement payments through popular digital-payment options, such as PayPal, Amazon, and virtual debit cards.

## A.B. Data's Leadership



A.B. Data's administration team is composed of the following key executives, who collectively have decades of experience settling and administering class actions:

**Bruce A. Arbit, Co-Managing Director** and one of the founders of the A.B. Data Group, serves as Chairman of the Board and oversees the day-to-day operations of the A.B. Data Group of companies, employing almost 400 people in the United States and Israel. Mr. Arbit is also Chairman of the Board of Integrated Mail Industries, Ltd. and has served as a member of the Board of Directors of University National Bank and State Financial Bank. He is the past Chairman of Asset Development Group, Inc., Home Source One, and American Deposit Management and is a member of the National Direct Marketing Association, the Direct Marketing Fundraising Association, and the American Association of Political Consultants. He was named 1996 Direct Marketer of the Year by the Wisconsin Direct Marketing Association.

A.B. Data's work in class action litigation support began with the Court selecting A.B. Data to oversee the restitution effort in the now-famous Swiss Banks Class Action Case, the International Commission on Holocaust Era Insurance Claims, and every other Holocaust Era Asset Restitution program, in which it was the company's job to identify, contact, and inform survivors of the Holocaust. A.B. Data delivered by reaching out to millions of people in 109 countries who spoke more than 30 languages. Since those days, Mr. Arbit has guided the class action division through phenomenal growth and success. Today, A.B. Data manages hundreds of administrations annually that distributes billions of dollars to class members.

**Thomas R. Glenn, President**, Mr. Glenn's management of A.B. Data's Class Action Administration Company includes designing and implementing notice plans and settlement administration programs for antitrust, securities, and Securities and Exchange Commission settlements and SEC disgorgement fund distributions, as well as consumer, employment, insurance, and civil rights class actions. Mr. Glenn previously served as Executive Vice President at Rust Consulting and has more than 30 years of executive leadership experience.

**Eric Miller, Senior Vice President**, as a key member of A.B. Data's Class Action Administration Leadership Team, oversees the Case Management Department and supervises the operations and procedures of all of A.B. Data's class action administration cases. Mr. Miller is recognized in the class action administration industry as an expert on securities, SEC, consumer, product recall, product liability, general antitrust, pharmaceutical antitrust, and futures contract settlements, to name a few settlement types. Prior to joining A.B. Data, Mr. Miller served as the Client Service Director for Rust Consulting, responsible there for its securities practice area. He has more than 20 years of operations, project management, quality assurance, and training experience in the class action administration industry. In addition, Mr. Miller manages A.B. Data's office in Palm Beach Gardens, Florida.

**Elaine Pang, Vice President, Media**, oversees the Media Department and is responsible for the direction, development, and implementation of media notice plans for A.B. Data's clients. Ms. Pang brings more than 15 years of experience in developing and implementing multifaceted digital and traditional media for high profile complex legal notice programs. She uses her experience in class actions and advertising to provide the best practicable notice plans for large scale campaigns across domestic and international regions, and she leverages her expertise to better understand the evolving media landscape and utilize cutting-edge technology and measurement tools. Prior to entering the class action industry, Ms. Pang worked with many leading reputable brands, including General Mills, Air Wick, Jet-Dry, Comedy Central, Madison Square Garden, Radio City Music Hall, and Geox. She earned her MBA from Strayer University and holds a BS in Marketing from Pennsylvania State University. Ms. Pang's credentials include Hootsuite Social Marketing Certification, Google Adwords and Analytics Certification, and IAB Digital Media Buying and Planning Certification.

**Eric Schachter, Senior Vice President**, is a member of A.B. Data's Class Action Administration Leadership Team. He has over 15 years of experience in the legal settlement administration services industry. Mr. Schachter's responsibilities include ensuring successful implementation of claims administration services for A.B. Data's clients in accordance with settlement agreements, court orders, and service agreements. He also works closely with Project Managers to develop plans of administration to provide the highest level of effective and efficient delivery of work product. A frequent speaker on claims administration innovation and best practices at industry events nationwide, Mr. Schachter has a bachelor's degree in sociology from Syracuse University, earned his law degree at Hofstra University School of Law, and was previously an associate at Labaton Sucharow LLP in New York City.

**Paul Sauberer, Vice President of Quality**, is responsible for overseeing quality assurance and process management, working diligently to mitigate risk, ensure exceptional quality control, and develop seamless calculation programming. Mr. Sauberer brings more than 20 years of experience as a quality assurance specialist with a leading claims-processing company where he developed extensive knowledge in securities class action administration. He is recognized as the class action administration industry's leading expert on claims and settlement administrations of futures contracts class actions.

**Justin Parks, Vice President**, is a member of A.B. Data's Class Action Administration Leadership Team. Mr. Parks brings extensive experience in client relations to A.B. Data's business development team. Mr. Parks has over 15 years of experience in the legal settlement administration services industry and has successfully managed and consulted on notice plans and other administrative aspects in hundreds of cases. Mr. Parks is uniquely experienced in Data Privacy matters, having consulted with clients on numerous matters stemming from data breaches as well as violations of the Illinois Biometric Information Privacy Act (BIPA), including some of the first ever Biometric Privacy related settlements in history. Mr. Parks' knowledge and understanding of the class action industry, as well as his client relationship skills, expand A.B. Data's capacity to achieve its business development and marketing goals effectively.

**Steve Straub, Claimant Operations Director**, started with A.B. Data in 2012 as a Claims Administrator. He moved through the ranks within the company where he spent the past five years as Senior Project Manager managing many of the complex commodities cases such as *In re LIBOR-Based Financial Instruments Antitrust Litigation*, *In re London Silver Fixing, Ltd. Antitrust Litigation*, and *Laydon v. Mizuho Bank, Ltd., et al.* Mr. Straub's performance in these roles over the past ten years, along with his comprehensive knowledge of company and industry practices and first-person experience leading the project management team, has proven him an invaluable member of the A.B. Data team.

In his role as Claimant Operations Director, his responsibilities include developing efficiencies within the operations center, which includes mailroom, call center, and claims processing areas. His areas of expertise include business process development, strategic/tactical operations planning and implementation, risk analysis, budgeting, business expansion, growth planning and implementation, cost reduction, and profit, change, and project management. Mr. Straub is well-versed in the administration of securities, consumer, and antitrust class action settlements. He earned his Juris Doctor degree from Seton Hall University School of Law in Newark, New Jersey.

**Jack Ewashko, Director of Client Services**, brings twenty years of industry and brokerage experience to his role with A.B. Data. He is an accomplished client manager adept at facilitating proactive communications between internal and outside parties to ensure accurate and timely deliverables. Mr. Ewashko previously held positions at two claim administration firms where he oversaw the securities administration teams and actively managed numerous high-profile matters, including the \$2.3 billion foreign exchange litigation. He notably served as Vice President, FX and Futures Operations at Millennium Management, a prominent global alternative investment management firm. As he progressed through trading, analytic, management, and consultancy roles at major banks and brokerage firms, Mr. Ewashko gained hands-on experience with vanilla and exotic securities products, including FX, commodities, mutual funds, derivatives, OTC, futures, options, credit, debt, and equities products. In the financial sector, he also worked closely with compliance and legal teams to ensure accuracy and conformity with all relevant rules and regulations regarding the marketing and sale of products, as well as the execution and processing of trades. He has held Series 4, Series 6, Series 7, and Series 63 licenses, and has been a member of the Futures Industry Association (FIA) and Financial Industry Regulatory Authority (FINRA). Mr. Ewashko earned his Bachelor of Business Administration from Long Island University, Brooklyn, New York.

**Brian Devery, Director of Client Services**, brings more than a decade of experience in class action administration and project management, as well as over two decades of experience as an attorney (ret.). Mr. Devery currently focuses on consumer, antitrust, employment, and other non-securities based administrations. In addition to driving project administration, he is focused on the implementation of process improvement, streamlining, and automation. Mr. Devery is admitted to practice law in State and Federal Courts of New York with his Juris Doctorate earned from the Maurice A. Deane School of Law at Hofstra University, Hempstead, New York.

**Adam Walter, PMP, Senior Project Manager**, has nearly fifteen years of experience managing the administration of securities class action settlements and SEC disgorgements totaling more than \$4 billion. He has managed settlement programs in engagements involving some of the largest securities class action settlements and is a key contributor to the development of administration strategies that meet the evolving needs of our clients. His responsibilities include developing case administration strategies to ensure that all client and court requirements and objectives are met, overseeing daily operations of case administrations, ensuring execution of client deliverables, providing case-related legal and administration support to class counsel, overseeing notice dissemination programs, implementing complex claims-processing and allocation methodologies, establishing quality assurance and quality control procedures, and managing distribution of settlement funds. Mr. Walter holds a bachelor's degree in business administration from Florida Atlantic University, Boca Raton, Florida. He also has been an active member of the Project Management Institute since 2010 and is PMP®-certified.

**Eric Nordskog, Senior Project Manager**, started with A.B. Data in 2012 on the operations team, managing dozens of team leads and claims administrators in the administration of legal cases and actions. In 2017, Mr. Nordskog was promoted to Project Manager, due in part to his proven ability to add consistency and efficiency to the e-claim filing process with new streamlined processes and audit practices. Today, as Senior Project Manager, he directs many of A.B. Data's securities, insurance, and

consumer cases. He regularly oversees the administration of large insurance cases, such as two recent Cigna Insurance matters that involved complex calculations and over one million class members each. He is also the primary hiring and training manager for new project managers and coordinators. Mr. Nordskog earned his Juris Doctor degree from Marquette University Law School, Milwaukee, in 2001.

**Bruce Holman, Senior Project Manager**, began working with A.B. Data in 2020, bringing his many years of claims administration management experience to the team. Mr. Holman oversees many of A.B. Data's labor and employment cases, acting as a consultant to A.B. Data's clients and offering strategy approaches to his fellow project managers and the class action administration team. His industry knowledge and expertise have made him an invaluable member of the A.B. Data team.

**Eric Schultz, MCSE, Information Technology Manager and Security Team Chairperson**, has been with A.B. Data for more than 19 years, and is currently responsible for overseeing all information technology areas for all A.B. Data divisions across the United States and abroad, including network infrastructure and architecture, IT operations, data security, disaster recovery, and all physical, logical, data, and information systems security reviews and audits required by our clients or otherwise. As a Microsoft Certified Systems Engineer (MCSE) with more than 25 years of experience in information technology systems and solutions, Mr. Schultz has developed specializations in network security, infrastructure, design/architecture, telephony, and high-availability network systems.

## Secure Environment



**A.B. Data's facilities provide the highest level of security** and customization of security procedures, including:

- A Secure Sockets Layer server
- Video monitoring
- Limited physical access to production facilities
- Lockdown mode when checks are printed
- Background checks of key employees completed prior to hire
- Frequency of police patrol – every two hours, with response time of five or fewer minutes
- Disaster recovery plan available upon request

## Data Security



**A.B. Data is committed to protecting the confidentiality, integrity, and availability of personal identifying information** and other information it collects from our clients, investors, and class members and requires that its employees, subcontractors, consultants, service providers, and other persons and entities it retains to assist in distributions do the same. A.B. Data has developed an Information Security Policy, a suite of policies and procedures intended to cover all information security issues and bases for A.B. Data, and all of its divisions, departments, employees, vendors, and clients. A.B. Data has also recently taken the necessary, affirmative steps toward compliance with the EU's General Data Protection Regulation and the California Consumer Privacy Act.

A.B. Data has a number of high-profile clients, including the Securities and Exchange Commission (SEC), the United States Department of Justice, the Attorneys General of nearly all 50 states, other agencies of the United States government, and the Government of Israel, as well as direct banking and payment services companies with some of the most recognized brands in United States financial services and some of the largest credit card issuers in the world.

We are therefore frequently subjected to physical, logical, data, and information systems security reviews and audits. We have been compliant with our clients' security standards and have also been determined to be compliant with ISO/IEC 27001/2 and Payment Card Industry (PCI) data-security standards, the Gramm-Leach-Bliley Act (GLB) of 1999, the National Association of Insurance Commissioners (NAIC) Regulations, the Health Insurance Portability and Accountability Act (HIPAA) of 1996, and the Health Information Technology for Economic and Clinical Health Act (HITECH).

The Government of Israel has determined that A.B. Data is compliant with its rigorous security standards in connection with its work on Project HEART (Holocaust Era Asset Restitution Taskforce).

A.B. Data's fund distribution team has been audited by EisnerAmper LLP and was found compliant with class action industry standards and within 99% accuracy. EisnerAmper LLP is a full-service advisory and accounting firm and is ranked the 15th-largest accounting firm in the United States.

In addition, as part of PCI compliance requirements, A.B. Data has multiple network scans and audits from third-party companies, such as SecurityMetrics and 403 Labs, and is determined to be compliant with each of them.

## Fraud Prevention and Detection



**A.B. Data is at the forefront of class action fraud prevention.**

A.B. Data maintains and utilizes comprehensive proprietary databases and procedures to detect fraud and prevent payment of allegedly fraudulent claims.

We review and analyze various filing patterns across all existing cases and claims. Potential fraudulent filers are reported to our clients as well as to the appropriate governmental agencies where applicable.

## Representative Class Action Engagements



**A.B. Data and/or its team members have successfully administered** hundreds of class actions, including many major cases. Listed below are just some of the most representative or recent engagements.

### Consumer & Antitrust Cases

- *In re EpiPen Marketing, Sales Practices and Antitrust Litigation*

- *In re Broiler Chicken Antitrust Litigation - Commercial (Indirect)*
- *In re Broiler Chicken Antitrust Litigation - Indirect*
- *In re Broiler Chicken Antitrust Litigation - Direct*
- *In re Pork Antitrust Litigation - Directs*
- *In re Pork Antitrust Litigation - Indirects*
- *Peter Staley, et al. v. Gilead Sciences, Inc., et al.*
- *In re: Opana ER Antitrust Litigation*
- *In re Ranbaxy Generic Drug Application Antitrust Litigation*
- *In re Valeant Pharmaceuticals Int'l, Inc. Third-Party Payor Litigation*
- *Staley, et al., v. Gilead Sciences*
- *In Re: Generic Pharmaceuticals Pricing Antitrust Litigation - Direct Purchasers*
- *Beef Direct Purchaser Antitrust Litigation*
- *BCBSM, Inc. v. Vyera Pharmaceuticals, et al. (Daraprim)*
- *In re Automobile Antitrust Cases I and II*
- *Olean Wholesale Grocery Cooperative, Inc., et al. v. Agri Stats, Inc., et al. (Turkey)*
- *Integrated Orthopedics, Inc., et al. v. UnitedHealth Group, et al.*
- *In Re: Restasis (Cyclosporine Ophthalmic Emulsion) Antitrust Litigation*
- *Vista Healthplan, Inc., et al. v. Cephalon, Inc., et al. (Provigil)*
- *Jeffrey Koenig, et al. v. Vizio, Inc.*
- *Wit, et al. v. United Behavioral Health*
- *Weiss, et al. v. SunPower Corporation*
- *Smith, et al. v. FirstEnergy Corp., et al.*
- *Resendez, et al. v. Precision Castparts Corp. and PCC Structural, Inc.*
- *Julian, et al. v. TTE Technology, Inc., dba TCL North America*
- *Eugenio and Rosa Contreras v. Nationstar Mortgage LLC*
- *Phil Shin, et al. v. Plantronics, Inc.*
- *In re: Qualcomm Antitrust Litigation*
- *In re Resistors Antitrust Litigation*
- *The Hospital Authority of Metropolitan Government of Nashville and Davidson County, Tennessee v. Momenta Pharmaceuticals, Inc. and Sandoz Inc. ("Lovenox Antitrust Matter")*
- *William Kivett, et al. v. Flagstar Bank, FSB, and DOES 1-100, inclusive*
- *Adelphia, Inc. v. Heritage-Crystal Clean, Inc.*
- *LLE One, LLC, et al. v. Facebook, Inc.*
- *Bach Enterprises, Inc., et al. v. Advanced Disposal Services South, Inc., et al.*
- *JWG Inc., et al. v. Advanced Disposal Services Jacksonville, L.L.C., et al.*
- *State of Washington v. Motel 6 Operating L.P. and G6 Hospitality LLC*
- *In re GSE Bonds Antitrust Litigation*
- *Wave Lengths Hair Salons of Florida, Inc., et al. v. CBL & Associates Properties, Inc., et al.*
- *In re Loestrin 24 FE Antitrust Litigation*
- *Office of the Attorney General, Department of Legal Affairs, State of Florida v. Pultegroup, Inc. and Pulte Home Company, LLC*
- *In re Cigna-American Specialties Health Administration Fee Litigation*
- *In re: Intuniv Antitrust Litigation*
- *High Street, et al. v. Cigna Corporation, et al.*
- *Gordon Fair, et al. v. The Archdiocese of San Francisco, San Mateo, and Marin County*
- *Bizzarro, et al. v. Ocean County Department of Corrections, et al.*
- *Meeker, et al. v. Bullseye Glass Co.*
- *MSPA Claims 1, LLC v. Ocean Harbor Casualty Insurance Company*
- *Tennille v. Western Union Company - Arizona*
- *Garner, et al. v. Atherotech Holdings, Inc. and Garner, et al. v. Behrman Brothers IV, LLC, et al.*

- *Robinson, et al. v. Escallate, LLC*
- *Josefina Valle and Wilfredo Valle, et al. v. Popular Community Bank f/k/a Banco Popular North America*
- *Vision Construction Ent., Inc. v. Waste Pro USA, Inc. and Waste Pro USA, Inc. and Waste Pro of Florida, Inc.*
- *Plumley v. Erickson Retirement Communities, et al.*
- *In re London Silver Fixing, Ltd. Antitrust Litigation*
- *Ploss v. Kraft Foods Group, Inc. and Mondelēz Global LLC*
- *In re Mexican Government Bonds Antitrust Litigation*
- *In re Ready-Mixed Concrete Antitrust Litigation*
- *In re: Marine Hose Antitrust Litigation*
- *Iowa Ready Mixed Concrete Antitrust Litigation*
- *In re Potash Antitrust Litigation (II)*
- *In re Evanston Northwestern Healthcare Corp. Antitrust Litigation*
- *In re Polyurethane Foam Antitrust Litigation*
- *In re LIBOR-Based Financial Instruments Antitrust Litigation*
- *In re Lorazepam and Clorazepate Antitrust Litigation*
- *In re Cardizem CD Antitrust Litigation*
- *Vista Healthplan, Inc., and Ramona Sakiestewa v. Bristol-Myers Squibb Co., and American BioScience, Inc.*
- *In re Lupron Marketing and Sales Practices Litigation*
- *In re Terazosin Hydrochloride Antitrust Litigation*
- *In re Warfarin Sodium Antitrust Litigation*
- *Rosemarie Ryan House, et al. v. GlaxoSmithKline PLC and SmithKline Beecham Corporation*
- *Carpenters and Joiners Welfare Fund, et al. v. SmithKline Beecham*
- *New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund, et al. v. Purdue Pharma L.P.*
- *In Re Pharmaceutical Industry Average Wholesale Price Litigation*
- *Alma Simonet, et al. v. SmithKline Beecham Corporation, d/b/a GlaxoSmithKline*
- *In re Relafen Antitrust Litigation*
- *In Re Remeron Direct Purchaser Antitrust Litigation*
- *In re TriCor Indirect Purchasers Antitrust Litigation*
- *Nichols, et al., v. SmithKline Beecham Corporation*
- *In re: DDAVP Indirect Purchaser Antitrust Litigation*

## Securities Cases

- *Plymouth County Retirement Association v. Spectrum Brands Holdings, Inc., et al.*
- *Tung, et al. v. Dycom Industries, Inc., et al.*
- *Boutchard, et al. v. Gandhi, et al. ("Tower/e-Minis")*
- *MAZ Partners LP v. First Choice Healthcare Solutions, Inc.*
- *SEB Investment Management AB, et al. v. Symantec Corporation, et al.*
- *In re Impinj, Inc. Securities Litigation*
- *In re Netshoes Securities Litigation*
- *Yellowdog Partners, LP, et al. v. Curo Group Holdings Corp., et al.*
- *In re Brightview Holdings, Inc. Securities Litigation*
- *In re Obalon Therapeutics, Inc. Securities Litigation*
- *In re Willis Towers Watson PLC Proxy Litigation*
- *In re Blue Apron Holdings, Inc. Securities Litigation*
- *In re: Qudian Inc. Securities Litigation*

- *Plymouth County Contributory Retirement System v. Adamas Pharmaceuticals, et al.*
- *In re Perrigo Company PLC Securities Litigation*
- *Enriquez, et al. v. Nabriva Therapeutics PLC, et al.*
- *Teamsters Local 456 Pension Fund, et al. v. Universal Health Services, Inc., et al.*
- *Olenik, et al. v. Earthstone Energy, Inc.*
- *Shenk v. Mallinckrodt plc, et al.*
- *In re The Allstate Corp. Securities Litigation*
- *Christopher Vataj v. William D. Johnson, et al. (PG&E Securities II)*
- *Kirkland v. WideOpenWest, Inc.*
- *Oklahoma Police Pension and Retirement System v. Sterling Bancorp, Inc.*
- *In re Uxin Limited Securities Litigation*
- *City of Hallandale Beach Police Officers' & Firefighters' Personnel Retirement Trust v. Ergen, et al. (Echostar)*
- *Lewis v. YRC Worldwide Inc., et al.*
- *Tomaszewski v. Trevena, Inc., et al.*
- *In re Restoration Robotics, Inc. Securities Litigation*
- *Public Employees' Retirement Systems of Mississippi, et al. v. Treehouse Foods, Inc., et al.*
- *Ronald L. Jackson v. Microchip Technology, Inc., et al.*
- *In re Micro Focus International plc Securities Litigation*
- *In re Dynagas LNG Partners LP Securities Litigation*
- *Weiss, et al. v. Burke, et al. (Nutraceutical)*
- *Yaron v. Intersect ENT, Inc., et al.*
- *Utah Retirement Systems v. Healthcare Services Group, Inc., et al.*
- *In re PPDAI Group Inc. Securities Litigation*
- *In re: Evoqua Water Technologies Corp. Securities Litigation*
- *In re Aqua Metals, Inc. Securities Litigation*
- *St. Lucie County Fire District Firefighters' Pension Trust Fund v. Southwestern Energy Company*
- *In re CPI Card Group Inc. Securities Litigation*
- *Arkansas Teacher Retirement System, et al. v. Alon USA Energy, Inc., et al.*
- *In re TAL Education Group Securities Litigation*
- *GCI Liberty Stockholder Litigation*
- *In re SciPlay Corporation Securities Litigation*
- *In re Allergan Generic Drug Pricing Securities Litigation*
- *In re Vivint Solar, Inc. Securities Litigation*
- *In re YayYo Securities Litigation*
- *In re JPMorgan Treasury Futures Spoofing Litigation*
- *Searles, et al. v. Crestview Partners, LP, et al. (Capital Bank)*
- *In re Lyft, Inc. Securities Litigation*
- *In re Aegean Marine Petroleum Network, Inc. Securities Litigation*
- *In re JPMorgan Precious Metals Spoofing Litigation*
- *In re Pivotal Software, Inc. Securities Litigation*
- *Longo, et al. v. OSI Systems, Inc., et al.*
- *In re Homefed Corporation Stockholder Litigation*
- *Pierrelouis v. Gogo Inc., et al.*
- *Pope v. Navient Corporation, et al.*
- *In re Merit Medical Systems, Inc. Securities Litigation*
- *In re Frontier Communications Corporation Stockholder Litigation*
- *Holwill v. AbbVie Inc.*
- *Budicak, Inc., et al. v. Lansing Trade Group, LLC, et al. (SRW Wheat Futures)*
- *Yannes, et al. v. SCWorx Corporation*

- *In re Fannie Mae/Freddie Mac Senior Preferred Stock Purchase Agreement Class Action Litigations*
- *In re Myriad Genetics, Inc. Securities Litigation*
- *In re Chicago Bridge & Iron Co. N.V. Securities Litigation*
- *The Arbitrage Fund, et al. v. William Petty, et al. (Exactech)*
- *In re Columbia Pipeline Group, Inc. Merger Litigation*
- *Martinek v. AmTrust Financial Services, Inc.*
- *City of Pittsburgh Comprehensive Municipal Pension Trust Fund, et al. v. Benefitfocus, Inc., et al.*
- *In re: Evoqua Water Technologies Corp. Securities Litigation*
- *Laydon v. Mizuho Bank, Ltd., et al.*
- *Lomingkrit, et al. v. Apollo Education Group, Inc., et al.*
- *In re Caraco Pharmaceutical Laboratories, Ltd. Shareholder Litigation*
- *Norfolk County Retirement System, et al. v. Community Health Systems, Inc., et al.*
- *Chester County Employees' Retirement Fund v. KCG Holdings, Inc., et al.*
- *Oklahoma Law Enforcement Retirement System, et al. v. Adeptus Health Inc., et al.*
- *Di Donato v. Insys Therapeutics, Inc., et al.*
- *Lundgren-Wiedinmyer, et al. v. LJM Partners, Ltd, et al.*
- *Martin, et al. v. Altisource Residential Corporation, et al.*
- *Stephen Appel, et al. v. Apollo Management, et al.*
- *In re Medley Capital Corporation Stockholder Litigation*
- *Forman, et al. v. Meridian BioScience, Inc., et al.*
- *Public Employees' Retirement System of Mississippi, et al. v. Endo International PLC, et al.*
- *In Re Flowers Foods, Inc. Securities Litigation*
- *Jiangchen, et al. v. Rentech, Inc., et al.*
- *In re Liberty Tax, Inc. Stockholder Litigation*
- *In re RH, Inc. Securities Litigation*
- *Lazan v. Quantum Corporation, et al.*
- *Nabhan v. Quantum Corporation, et al.*
- *Edmund Murphy III, et al. v. JBS S.A.*
- *Public Employees' Retirement System of Mississippi, et al. v. Sprouts Farmers Market, Inc., et al.*
- *In re Starz Stockholder Litigation*
- *Judith Godinez, et al. v. Alere Inc., et al.*
- *Rahman and Giovagnoli, et al. v. GlobalSCAPE, Inc., et al.*
- *Arthur Kaye, et al. v. ImmunoCellular Therapeutics, Ltd., et al.*
- *In re CPI Card Group Inc. Securities Litigation*
- *Daniel Aude, et al. v. Kobe Steel, Ltd., et al.*
- *In re Quality Systems, Inc. Securities Litigation*
- *Cooper, et al. v. Thoratec Corporation, et al.*
- *Washtenaw County Employees' Retirement System, et al. v. Walgreen Co., et al.*
- *Elkin v. Walter Investment Management Corp., et al.*
- *In Re CytRx Corporation Securities Litigation*
- *Ranjit Singh, et al. v. 21Vianet Group, Inc., et al.*
- *In re PTC Therapeutics, Inc. Securities Litigation*
- *Securities and Exchange Commission v. Mark A. Jones*
- *In re Sequans Communications S.A. Securities Litigation*
- *In re Henry Schein, Inc. Securities Litigation*
- *Ronge, et al. v. Camping World Holdings, Inc., et al.*
- *Oklahoma Firefighters Pension & Retirement System v. Lexmark International, Inc.*
- *Christakis Vrakas, et al. v. United States Steel Corporation, et al.*
- *Emerson et al. v. Mutual Fund Series Trust, et al. ("Catalyst")*
- *In re Fannie Mae 2008 Securities Litigation*

- *In re Anadarko Petroleum Corporation Class Action Litigation*
- *Ge Dandong, et al., v. Pinnacle Performance Limited, et al.*
- *In Re: Rough Rice Commodity Litigation*
- *Xuechen Yang v. Focus Media Holding Limited et al.*
- *In re Massey Energy Co. Securities Litigation*
- *In re Swisher Hygiene, Inc.*
- *The City of Providence vs. Aeropostale, Inc., et al.*
- *In re Metrologic Instruments, Inc. Shareholders Litigation*
- *Public Pension Fund Group v. KV Pharmaceutical Company et al.*
- *Pension Trust Fund for Operating Engineers, et al. v. Assisted Living Concepts, Inc., et al.*
- *In re Lehman Brothers Equity/Debt Securities Litigation*
- *In re: Platinum and Palladium Commodities Litigation (Platinum/Palladium Physical Action)*
- *In re: Platinum and Palladium Commodities Litigation (Platinum/Palladium Futures Action)*
- *In re General Electric Co. Securities Litigation*
- *In re CNX Gas Corporation Shareholders Litigation*
- *Oscar S. Wyatt, Jr. et al. v. El Paso Corporation, et al.*
- *In re Par Pharmaceutical Securities Litigation*
- *In re Par Pharmaceutical Companies, Inc. Shareholders Litigation*
- *In re Delphi Financial Group Shareholders Litigation*
- *In re SLM Corporation Securities Litigation*
- *In re Del Monte Foods Company Shareholder Litigation*
- *Leslie Niederklein v. PCS Edventures!.com, Inc. and Anthony A. Maher*
- *In re Beckman Coulter, Inc. Securities Litigation*
- *Michael Rubin v. MF Global, Ltd., et al.*
- *Allen Zametkin v. Fidelity Management & Research Company, et al.*
- *In re BP Prudhoe Bay Royalty Trust Securities Litigation*
- *Police and Fire Retirement System of the City of Detroit et al. v. SafeNet, Inc., et al.*
- *In re Limelight Networks, Inc. Securities Litigation*
- *In re Gilead Sciences Securities Litigation*
- *In re ACS Shareholder Litigation, Consolidated C.A. No. 4940-VCP*
- *Lance Provo v. China Organic Agriculture, Inc., et al.*
- *In re LDK Solar Securities Litigation*

### Labor & Employment Cases

- *Verizon OFCCP Settlement*
- *Alvarez, et al. v. GEO Secure Services, LLC*
- *Sartena v. Meltwater FLSA*
- *Carmen Alvarez, et al. v. Chipotle Mexican Grill, Inc., et al.*
- *Turner, et al. v. Chipotle Mexican Grill, Inc.*
- *Long, et al. v. Southeastern Pennsylvania Transportation Authority*
- *Matheson, et al. v. TD Bank, N.A.*
- *Ludwig, et al. v. General Dynamics Information Technology, Inc., et al.*
- *Bedel, et al. v. Liberty Mutual Group Inc.*
- *Irene Parry, et al. v. Farmers Insurance Exchange, et al.*
- *Maldonado v. The GEO Group, Inc.*
- *Alderman and Maxey v. ADT, LLC*
- *Albaceet v. Dick's Sporting Goods*
- *Rodriguez v. The Procter & Gamble Company*
- *Adekunle, et al. v. Big Bang Enterprises, Inc. d/b/a The Revenue Optimization Companies*

- *Gorski, et al. v. Wireless Vision, LLC*
- *Lopez, et al. v. New York Community Bank, et al.*
- *Hamilton, et al. v. The Vail Corporation, et al.*
- *Eisenman v. The Ayco Company L.P.*
- *Matheson v. TD Bank, N.A.*
- *Simon v. R.W. Express LLC, d/b/a Go Airlink NYC*
- *Perez v. Mexican Hospitality Operator LLC, d/b/a Cosme*
- *Shanahan v. KeyBank, N.A.*
- *Loftin v. SunTrust Bank*
- *Alvarez v. GEO Secure Services, LLC*
- *Weisgarber v. North American Dental Group, LLC*
- *Talisa Borders, et al. v. Wal-mart Stores, Inc.*
- *Reale v. McClain Sonics Inc., et al.*
- *Larita Finisterre and Songhai Woodard, et al. v. Global Contact Services, LLC*
- *Adebisi Bello v. The Parc at Joliet*
- *Garcia, et al. v. Vertical Screen, Inc.*
- *Brook Lemma and Matthieu Hubert, et al. v. 103W77 Partners LLC, et al. ("Dovetail Settlement")*
- *American Federation of Government Employees, Local 1145 v. Federal Bureau of Prisons, U.S. Penitentiary, Atlanta, Georgia*
- *Lisa Ferguson, Octavia Brown, et al. v. Matthew G. Whitaker, Acting AG, DOJ Bureau of Prisons ("USP Victorville")*
- *American Federation of Government Employees, Local 2001 v. Federal Bureau of Prisons, Federal Correctional Institution, Fort Dix, New Jersey*
- *American Federation of Government Employees, Local 506 v. U.S. Department of Justice, Federal Bureau of Prisons, U.S. Penitentiary Coleman II, Coleman, Florida*
- *Vargas v. Sterling Engineering*
- *Rosenbohm v. Verizon*
- *Alex Morgan, et al. v. United States Soccer Federation, Inc.*
- *Iskander Rasulev v. Good Care Agency, Inc.*
- *Kyndl Buzas, et al., v. Phillips 66 Company and DOES 1 through 10*
- *American Federation of Government Employees, Local 408 v. U.S. Dept. of Justice, Federal Bureau of Prisons, Federal Correctional Complex, Butner, NC*
- *In re 2014 Avon Products, Inc. ERISA Litigation*
- *In re Eastman Kodak ERISA Litigation*
- *Taronica White, et al. v. Attorney General Loretta Lynch, Department of Justice*
- *Lisa Ferguson, et al. v. Acting Attorney General Matthew Whitaker, Department of Justice*
- *Melissa Compere v. Nusret Miami, LLC, et al.*
- *Abelar v. American Residential Services, L.L.C., Central District of California*
- *Flores, et al. v. Eagle Diner Corp., et al., Eastern District of Pennsylvania*
- *Michael Furman v. Godiva Chocolatier, Inc., 15<sup>th</sup> Judicial Circuit, Palm Beach County, Florida*
- *Finisterre et. al v. Global Contact Services, LLC, New York State Supreme Court, Kings County*
- *McGuire v. Intelident Solutions, LLC, et al., Middle District of Florida, Tampa Division*
- *Duran De Rodriguez, et al. v. Five Star Home Health Care Agency, Inc. et al., Eastern District of New York*

### Data Breach/BIPA Cases

- *Hunter v. J.S.T. Corp. BIPA Settlement*
- *Atkinson, et al. v. Minted, Inc.*
- *Rosenbach, et al. v. Six Flags Entertainment Corporation and Great America LLC*
- *Pratz, et al. v. MOD Super Fast Pizza, LLC*

- *The State of Indiana v. Equifax Data Breach Settlement*
- *In re: Vizio, Inc. Consumer Privacy Litigation*
- *In re: Google, Inc. Street View Electronic Communications Litigation*
- *Devin Briggs and Bobby Watson, et al. v. Rhinoag, Inc.* ("Briggs Biometric Settlement")
- *Trost v. Pretium Packaging L.L.C.*
- *In re: Barr, et al. v. Drizly, LLC f/k/a Drizly, Inc., et al.*

### Telephone Consumer Protection Act (TCPA) Cases

- *Perrong, et al. v. Orbit Energy & Power, LLC*
- *Baldwin, et al. v. Miracle-Ear, Inc.*
- *Floyd and Fabricant, et al. v. First Data Merchant Services LLC, et al.*
- *Hoffman, et al. v. Hearing Help Express, Inc., et al.*
- *Lowe and Kaiser, et al. v. CVS Pharmacy, Inc., et al.*
- *Johansen v. HomeAdvisor, Inc., et al.*
- *Charvat, et al. v. National Holdings Corporation*
- *Hopkins, et al. v. Modernize, Inc.*
- *Diana Mey vs. Frontier Communications Corporation*
- *Matthew Donaca v. Dish Network, L.L.C.*
- *Matthew Benzion and Theodore Glaser v. Vivint, Inc.*
- *John Lofton v. Verizon Wireless (VAW) LLC, et al.*
- *Lori Shamblin v. Obama for America, et al.*
- *Ellman v. Security Networks*

## For More Information

For more detailed information regarding A.B. Data's experience, services, or personnel, please see our website at [www.abdataclassaction.com](http://www.abdataclassaction.com).

# EXHIBIT B



Elaine Pang is Vice President of Media with A.B. Data’s Class Action Administration division and has over fifteen years of expertise in development of legal notice plans. She has directed a wide range of notice programs involving media planning, media buying, research, creative design process, and data analysis, resulting in the implementation of effective and efficient programs to reach potential class members. Ms. Pang has been involved in some of the largest and most complex legal notification plans in both domestic and international regions. Her programs satisfy due process requirements, as well as all applicable state and federal laws, and they adhere to the guidelines set forth in the *Manual for Complex Litigation, Fourth Edition* and by the Federal Judicial Center (FJC), as well as applicable state laws.

Ms. Pang is also a certified professional in IAB Digital Media Buying & Planning, IAB Media Sales, Hootsuite Social Marketing, Google Digital Sales, Google Analytics, Google AdWords, and Market Motive Internet Marketing Fundamentals. She also served as an IAB exam committee member, a group of 12-14 industry experts who work to ensure that certification exams stay current with the industry’s changing ecosystem by developing exam questions, reviewing exam content, and advising on the passing score of the exam. She holds a Bachelor of Science in marketing from The Pennsylvania State University and earned her MBA from Strayer University.

Prior to her professional experience in the class action notice and claims administration industry, Elaine established a strong portfolio working with many top brands including Marriott, General Mills, Air Wick, Jet-Dry, Comedy Central, Madison Square Garden, Radio City Music Hall, and Geox.

**CASE EXPERIENCE**

Ms. Pang has been instrumental in her involvement with developing, implementing, and analyzing media measurements across domestic and international multichannel platforms for notice programs. A partial listing of her case work is provided below.

CASE NAME	CASE NUMBER	LOCATION
<i>In re European Government Bonds Antitrust Litigation</i>	1:19-cv-02601	U.S. District Court for the Southern District of New York
<i>In re Broiler Chicken Antitrust Litigation</i>	1:16-cv-08637	U.S. District Court for the Northern District of Illinois
<i>Budicak, Inc. et al. v. Lansing Trade Group, LLC et al.</i>	2:19-cv-02449	U.S. District Court for the District of Kansas
<i>In re HIV Antitrust Litigation</i>	3:19-cv-02573-EMC	U.S. District Court for the Northern District of California



<i>In re Namenda Indirect Purchaser Antitrust Litigation</i>	1:15-cv-6549	U.S. District Court for the Southern District of New York
<i>In re Pork Antitrust Litigation</i>	No. 0:18-cv-01776-JRT-HB	U.S. District Court District of Minnesota
<i>Laydon v. Mizuho Bank, Ltd., et al.</i>	12-cv-3419	U.S. District Court for the Southern District of New York
<i>In re Opana ER Antitrust Litigation</i>	1:14-cv-10150	U.S. District Court for the Northern District of Illinois
<i>Christopher Julian, et al. v. TTE Technology, Inc.</i>	3:20-CV-02857-EMC	U.S. District Court Northern District of California
<i>In re Flint Water Cases</i>	5:16-cv-10444-JEL-EAS	NA
<i>Automobile Antitrust Cases I and II</i>	JCCP Nos. 4298 and 4303, Master File No. 19-md-02878	Superior Court of the State of California for the County of San Francisco
<i>Smith v. FirstEnergy Corp., et al.</i>	2:20-cv-3755	U.S. District Court for the Southern District of Ohio
<i>Fund Liquidation Holdings LLC. V. Citibank, N.A., et al.</i>	1:16-cv-5263 (AKH)	U.S. District Court for the Southern District of New York
<i>In re: Generic Pharmaceuticals Pricing Antitrust Litigation</i>	2:16-MD-02724	U.S. District Court for the Eastern District of Pennsylvania
<i>Sullivan, et al. v. Barclays plc, et al.</i>	13-cv-2811 (PKC)	U.S. District Court for the Southern District of New York
<i>Dennis, et al. v JP Morgan Chase &amp; Co., et al.</i>	16-cv-06496 (LAK)	U.S. District Court for the Southern District of New York
<i>Staley, et al. v. Gilead Sciences, Inc., et al.</i>	3:19-cv-02573-EMC	U.S. District Court for the Northern District of California
<i>In Re Ranbaxy Generic Drug Application Antitrust Litigation</i>	19-md-02878	U.S. District Court for the District of Massachusetts
<i>In re Capacitors Antitrust Lawsuit</i>	3:17-md-02801-JD	U.S. District Court for the Northern District of California
<i>In Re: Johnson &amp; Johnson Sunscreen Marketing, Sales Practices and Products Liability Litigation</i>	3015	U.S. District Court for the Southern District of Florida
<i>In re Citrus Canker Litigation</i>	03-8255 CA 13	Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida
<i>Hill-Green v. Experian Information Solutions, Inc.</i>	3:19-cv-00708	U.S. District Court for the Eastern District of Virginia
<i>Benson Githieya v. Global Tel Link Corp.</i>	1:15-CV-00986-AT	U.S. District Court for the Northern District of Georgia
<i>Bowen v. UPMC Settlement</i>	GD-21-002075	Allegheny Cty. Ct. Com. Pl.
<i>The Roman Catholic Diocese of Rockville Centre, New York</i>	20-12345	U.S. District Court for the Southern District of New York
<i>The Roman Catholic Church for the Archdiocese of New Orleans</i>	20-10846	U.S. Bankruptcy Court, Eastern District of Louisiana
<i>In re Roundup Products Liability Litigation</i>	3:16-md-02741-VC	U.S. District Court for the Northern District of California



<i>In re Boy Scouts of America and Delaware BSA, LLC</i>	20-10343	U.S. Bankruptcy Court for the District of Delaware
<i>Krueger v. Wyeth Inc, et al.</i>	3:03-cv-02496-JAH-MDD	U.S. District Court for the Southern District of California
<i>Hamm v. Sharp Electronics Corporation</i>	5:19-cv-00488	U.S. District Court for the Middle District of Florida
<i>In Re: PG&amp;E Corporation</i>	19-30088	U.S. District Court for the Northern District of California
<i>In re Chinese-Manufactured Drywall Products Liability Litigation</i>	2:09-md-02047	U.S. District Court for the Eastern District of Louisiana
<i>Colorado Attorney General CenturyLink Settlement</i>		
<i>The Hospital Authority of Metropolitan Government of Nashville and Davidson County v. Momenta Pharmaceuticals, Inc.</i>	15-CV-01100	U.S. District Court for the Middle District of Tennessee
<i>Freeman v. Grain Processing Corporation</i>	13-0723	Supreme Court of Iowa
<i>Culler v. Multi-State Lottery Association</i>	LACL136787	Iowa District Court for Polk County
<i>In re LIBOR-Based Financial Instrument Antitrust Litigation</i>	11-MD-2262	U.S. District Court for the Southern District of New York
<i>In re Domestic Airline Travel Antitrust Litigation</i>	2656	U.S. District Court for the District of Columbia
<i>MSPA Claims I, LLC v. IDS Property Casualty Insurance Company</i>	1:16-CV-21040	U.S. District Court for the Southern District of Florida
<i>Speaks v. U.S. Tobacco Cooperative, Inc.</i>	5:12-CV-729-D	U.S. District Court for the Eastern District of North Carolina
<i>Jabbari v. Wells Fargo &amp; Co.</i>	3:15-cv-02159	U.S. District Court for the Southern District of California
<i>United Desert Charities, et al. v. Sloan Valve Company, et al.</i>	12-CV-06878	U.S. District Court for the Central District of California
<i>In re: Volkswagen "Clean Diesel" MDL</i>	15-MD-2672-CRB	U.S. District Court for the Northern District of California
<i>In re: Automotive Parts Antitrust Litigation</i>	12-md-02311	U.S. District Court for the Eastern District of Michigan
<i>In re Municipal Derivatives Antitrust Litigation</i>	MDL No. 1950, No. 08-02516	U.S. District Court for the Southern District of New York
<i>In re: Oil Spill by the Oil Rig "Deepwater Horizon" in Gulf of Mexico</i>	MDL 2179	U.S. District Court for the Eastern District of Louisiana
<i>Muscarella v. Commonwealth of Pennsylvania</i>	10 F.R. 2011	Commonwealth Court of Pennsylvania
<i>Precision Associates Inc. v. Panalpina World Transport, et al.</i>	8-cv-00042	U.S. District Court for the Eastern District of New York
<i>Mirakay, et al. v. Dakota Growers Pasta Co. Inc., et al.</i>	3:13-cv-04429	U.S. District Court for the District of New Jersey
<i>Imran Chaudhri v. Osram Sylvania Inc.</i>	2:11-cv-05504	U.S. District Court for the District of New Jersey
<i>Trammell v. Barbara's Bakery Inc.</i>	12-cv-02664	U.S. District Court for the Northern District of California
<i>Independent Foreclosure Review</i>		Department of Justice
<i>In Re: TFT-LCD (Flat Panel) Antitrust Litigation</i>	MDL No. 1827	U.S. District Court, Northern District of California, San Francisco Division



<i>In re: Sony Gaming Networks and Customer Data Security Breach Litigation</i>	11-MD-2258	U.S. District Court for the Southern District of California
<i>Koyle v. Level 3 Communications, Inc.</i>	01-0286-S-BLW	U.S. District Court for the District of Idaho
<i>In Re: Korean Air Lines Co., Ltd. Antitrust Litigation</i>	07-01891	U.S. District Court for the Central District of California
<i>In re: DRAM Antitrust Litigation</i>	MDL No. 1486	U.S. District Court for the Northern District of California
<i>In re: Transpacific Passenger Air Transportation Antitrust Litigation</i>	07-CV-5634-CRB, MDL 1913	U.S. District Court for the Northern District of California
<i>In re M3Power Razor System Marketing &amp; Sales Practices Litigation</i>	05-cv-11177	U.S. District Court for the District of Massachusetts
<i>In re: NYC Bus Tour Antitrust Litigation</i>	13-cv-0711	U.S. District Court for the Southern District of New York
<i>In re: Electronic Books Antitrust Litigation</i>	1:11-md-02293	U.S. District Court for the Southern District of New York
<i>Scharfstein v. BP West Coast Products LLC</i>	1112-17046	State of Oregon Circuit Court for Multnomah County
<i>Vioxx Products Liability Litigation</i>	MDL No. 1657	U.S. District Court for the Eastern District of Louisiana
<i>Glaberson v. Comcast Corp.</i>	2:03-cv-06604-JP	U.S. District Court for the Eastern District of Pennsylvania
<i>Dolmage v. Province of Ontario</i>	CV-09-376927CP00	Ontario Superior Court of Justice
<i>Blessing v. Sirius XM Radio, Inc.</i>	09-CV-10035 HB	U.S. District Court for the Southern District of New York.
<i>Cipro Cases I and II</i>	No. 4154 and No. 4220	Superior Court of California
<i>In re National Football League Players' Concussion Injury Litigation</i>	MDL No. 2323	U.S. District Court for the Eastern District of Pennsylvania
<i>Hanley v. Fifth Third Bank</i>	1:2012cv01612	U.S. District Court for the Northern District of Illinois
<i>Roos v. Honeywell Int'l, Inc.</i>	04-0436205	Superior Court of California
<i>United Desert Charities, et al. v. Sloan Valve Company, et al.</i>	CV12-06878	U.S. District Court, Central District of California
<i>In re Toyota Motor Corp. Unintended Acceleration Mktg, Sales Practs., &amp; Prods. Litig.</i>	10-ml-2151	U.S. District Court for the Central District of California
<i>Abbott v. Lennox Industries Inc.</i>	16-2011-CA-010656	4th Jud. Cir. Ct., Dade Cty. Fla.
<i>In re: Metoprolol Succinate End-Payor Antitrust Litigation</i>	06-cv-71	U.S. District Court for the District of Delaware
<i>In re Imprelis® Herbicide Marketing, Sales Practices and Products Liability Litigation</i>	MDL 2284	U.S. District Court for the Eastern District of Pennsylvania
<i>Smajlaj, et al. v. Campbell Soup Company, et al.</i>	10-cv-01332-JBS-AMD	U.S. District Court for the District of New Jersey
<i>Kramer v. B2Mobile, LLC</i>	10-cv-02722	U.S. District Court for the Northern District of California
<i>Donovan v. Philip Morris USA, Inc.</i>	06-CA-12234	U.S. District Court for the District of Massachusetts



<i>In re National Arbitration Forum Trade Practices Litigation</i>	MDL No. 10-2122	U.S. District Court for the District of Minnesota
<i>In re: Pharmaceutical Industry Average Wholesale Price Litigation</i>	No. 01-CV-12257-PBS, MDL No. 1456	U.S. District Court for the District of Massachusetts
<i>Nelson v. Mead Johnson &amp; Company, LLC</i>	09-cv-61625-JIC	U.S. District Court for the Southern District of Florida
<i>Lee v. Carter-Reed Company, L.L.C.</i>	UNN-L-3969-04	Superior Court of New Jersey, Union County
<i>FTC Iovate Settlement</i>		Federal Trade Commission
<i>FTC LeanSpa Settlement</i>		Federal Trade Commission
<i>FTC Walgreens Settlement</i>		Federal Trade Commission
<i>Glazer v. Whirlpool Corp.</i>	No. 1:08-WP-65000, MDL 2001	U.S. District Court for the Northern District of Ohio
<i>Behrend v. Comcast Corp.</i>	03-6604	U.S. District Court for the Eastern District of Pennsylvania
<i>Commonwealth of Massachusetts v. Fremont Investment &amp; Loan</i>	07-4373-BLS	Commonwealth of Massachusetts
<i>Dolmage v. Province of Ontario</i>	CV-09-376927	Ontario Superior Court of Justice
<i>In re Lawn Mower Engine Horsepower Marketing and Sales Practices Litigation</i>	MDL No. 1999, 2:08-md-01999	U.S. District Court for the Eastern District of Wisconsin
<i>Craft, et al. v. Philip Morris Companies, Inc., et al.</i>	002-00406-02	Missouri Circuit Court, Twenty-Second Judicial Circuit
<i>In Re: Pre-Filled Propane Tank Marketing and Sales Practices Litigation</i>	MDL No. 2086	U.S. District Court for the Western District of Missouri
<i>In re BP Propane Indirect Purchaser Antitrust Litigation</i>	06-CV-3841	U.S. District Court for the Northern District of Illinois
<i>In re Vytarin/Zetia Marketing, Sales Practices, and Products Liability Litigation</i>	08-285(DMC)	U.S. District Court for the District of New Jersey
<i>In re Bluetooth Headset Product Liability Litigation</i>	07-ML-1822, MDL 1822	U.S. District Court for the Central District of California
<i>The Authors Guild, Inc., et al. v. Google Inc.</i>	05 CV 8136-DC	U.S. District Court for the Southern District of New York
<i>Larry Bowens, et al. v. 7-Eleven, Inc., The Southland Corporation, MDK Corporation, and ENSR Corporation</i>	20D03-0209-CT-48	Elkhart Superior Court No. 3
<i>Sadowski v. General Motors Corp.</i>	HG03093843	Superior Court of the State of California for the County of Alameda
<i>Cox, et al. v. Shell Oil Company</i>	18,844	Chancery Court for Obion County, at Union City, Tennessee
<i>Wilson v. Airborne, Inc., et al.</i>	EDC V07-770 VAP (OPx)	U.S. District Court for the Central District of California
<i>Galanti v. Goodyear Tire &amp; Rubber Company</i>	03-209	U.S. District Court for the District of New Jersey
<i>In re Toys "R" Us Antitrust Litigation</i>	CV-97-5750, MDL No. 1211	U.S. District Court for the Eastern District of New York
<i>In re W.R. Grace &amp; Co.</i>	01-01139	U.S. Bankruptcy Court for the District of Delaware



<i>Cobell v. Salazar</i>	96-01285	U.S. District Court for the District of Columbia
<i>Dryer v. National Football League</i>	9-02182	U.S. District Court for the District of Minnesota
<i>In re Black Farmers Discrimination Litig.</i>	08-511	U.S. District Court for the District of Columbia
<i>Keepseagle v. Vilsack</i>	99-03119	U.S. District Court for the District of Columbia
<i>In re Energy Future Holdings Corp.</i>	14-10979	U.S. Bankruptcy Court for the District of Delaware
<i>In re Garlock Sealing Technologies LLC</i>	10-31607	U.S. Bankruptcy Court for the Western District of North Carolina
<i>In re SCBA Liquidation, Inc., f/k/a Second Chance Body Armor, Inc.</i>	04-12515	U.S. Bankruptcy Court for the Western District of Michigan
<i>In re Enfamil LIPIL Mktg. &amp; Sales Practs. Litig.</i>	MDL No. 2222	U.S. District Court for the Southern District of Florida

## **ARTICLE**

Shannon Wheatman & Elaine Pang, *Reality Check: The State of Media and Its Usage in Class Notice*, in *A Practitioner's Guide to Class Actions*, 3rd Ed. 849 - 858 (Marcy Greer ed., 2021)

# EXHIBIT C

**EXHIBIT C**



A.B. Data, Ltd.  
Class Action Administration Company  
600 A.B. Data Drive  
Milwaukee, WI 53217

## Notice Plan

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*Sullivan, et al. v. Barclays plc, et al.*

Case No. 13-cv-2811(PKC)

United States District Court for the Southern District of New York  
April 13, 2023



## NOTICE PLAN OVERVIEW

### Case Background

This Notice Plan is submitted by A.B. Data, Ltd. (“A.B. Data”) in connection with *Sullivan, et al. v. Barclays plc, et al.*, Case No. 13-cv-2811 (PKC) (S.D.N.Y.) (the “Action”), a case before the United States District Court for the Southern District of New York.

This document outlines the efforts that will be made to provide notice of the Settlement to potential Class Members. Direct mail notice is intended to be the primary method of contacting a substantial portion of Class Members. However, because direct mail notice in this case may not reach all potential Class Members, a paid media Notice Plan targeting unidentified Class Members is used to supplement the direct mail notice.

The Notice Plan described herein is consistent with the requirements set forth in Rule 23 of the Federal Rules of Civil Procedure and is consistent with other A.B. Data-developed notice plans that have been approved by the Court in this Action and implemented in other financial instruments cases with regard to the methods and tools used in such plans. These cases include the following:

- *In re JPMorgan Precious Metals Spoofing Litigation*, Case No.:1:18-cv-10356 (GHW);
- *In re JPMorgan Treasury Futures Spoofing Litigation*, Case No. 1:20-cv-03515 (PAE);
- *Boutchard, et al. v. Gandhi, et al.*, 18-cv-7041 (N.D. Ill.); and
- *Laydon v. Mizuho Bank Ltd., et al.*, 12-cv-3419 (GBD) (S.D.N.Y.) and *Sonterra Capital Master Fund, Ltd., et al. v. UBS AG, et al.*, 15-cv-5844 (GBD) (S.D.N.Y.)

### Class Definition

The proposed Settlement Class is the same as the class the Court previously certified in connection with earlier settlements in this Action:

All Persons who purchased, sold, held, traded, or otherwise had any interest in Euribor Products from June 1, 2005, through and including March 31, 2011, who were either domiciled in the United States or its territories or, if domiciled outside the United States or its territories, transacted Euribor Products in the United States or its territories from June 1, 2005, through and including March 31, 2011, including, but not limited to, all Persons who traded CME Euro currency futures contracts, all Persons who transacted in NYSE LIFFE Euribor futures and options from a location within the United States, and all Persons who traded any other Euribor Product from a location within the United States.

Excluded from the Settlement Class are:

- Defendants;
- any parent, subsidiary, affiliate, or agent of any Defendant or any co-conspirator whether or not named as a defendant; and
- the United States Government.

## **Paid Media Placement Summary**

A.B. Data recommends targeted paid media notice consisting of direct mail, print, digital, and earned media that will reach both identified and unidentified Class Members. Each of the following Notice Plan elements is detailed further in this document:

- Direct mail;
- Print media;
- Digital media; and
- Earned media.

Targeted print and digital media placements are recommended to deliver the message to potential Class Members and other concerned persons and entities whose identities are unknown. Summaries of the recommended media tactics for each publication and digital media source follow.

The dedicated informational case website, which will include the Mailed Notice and Summary Publication Notice, will continue to be used to complement the Notice Plan and to ensure Class Members easy access to updated information.

## **Target Audience**

A.B. Data researched traders who transacted in Euribor Products to determine the target audience of potential Class Members. This information assisted in determining the most appropriate media vehicles that would best target potential Class Members and provide them with the opportunity to see and respond to the Notice. It has been determined that media targeting persons associated in the investment, finance, banking, brokerage, pension, and institutional investment management industries would be most likely to reach potential Class Members.

Paid and Earned media will be targeted to potential Class Members in the United States and territories.

## **Direct Mail**

Notice will be sent directly to a list of approximately 100,000 U.S.-based derivatives market participants, including: (1) members of the International Swaps and Derivatives Association (“ISDA”), a global trade association for OTC derivatives responsible for maintaining the standardized ISDA Master Agreement used in OTC Euribor Products transactions; (2) senior executives at hedge funds, investment banks, and real-estate companies – the commercial end-users of OTC Euribor Products; (3) financial executives, including pension-fund managers and derivatives traders, responsible for managing Euro exposure; (4) individual traders and brokers who have transacted in the Euro market during the Class Period; (5) the CME’s list of large traders, including those who transacted in Euro currency futures contracts; and (6) a proprietary list of banks, brokers, and other investors. This list is several times larger than the anticipated number of OTC Euribor Products market participants and should effectively reach a large percentage of the Class.

Société Générale will also be providing contact information for its counterparties that transacted in Euribor Products, consistent with the obligations set forth in their respective Settlement Agreement and

relevant foreign bank secrecy and/or customer confidentiality laws that may restrict their ability to provide counterparty-identifying information to third parties. Notice will also be sent to the Euribor Products counterparties of Barclays plc, Barclays Bank plc, Barclays Capital Inc., Citigroup, Inc., Citibank, N.A., Crédit Agricole S.A., Crédit Agricole CIB, Deutsche Bank AG, DB Group Services (UK) Ltd., HSBC Holdings plc, HSBC Bank plc, JPMorgan Chase & Co., JPMorgan Chase Bank, N.A. (collectively, the “Settling Defendants”), and the dismissed Defendants, to the extent that contact information was previously obtained via discovery and/or settlement cooperation. The Short-Form Notice will also be emailed to Class Members that previously filed a Proof of Claim and Release in connection with earlier settlements to advise them of the settlement with Société Générale.

### **Dealer Notification**

In addition to the direct-mail notice described above, notice will be sent to approximately 30 of the largest foreign-exchange and interest-rate-derivatives dealers in the United States with instructions to either (a) forward the notice on to their customers or (b) provide a customer list that the Settlement Administrator can notify directly. The list of dealers notified will come from the Federal Reserve Bank of New York’s triennial survey of turnover in the U.S. foreign-exchange and interest-rate derivatives markets.<sup>1</sup> Because these dealers collectively account for at least 90% to 95% of turnover in the OTC market, this method will reach almost all Class Members who transacted in OTC Euribor Products.

### **Print Media**

The Summary Notice will be published in each of the following investor- and business-targeted print publications. Summaries of the audience reached, editorial focus, and recommended media tactics follow for each publication.

- *The Wall Street Journal*
- *Investor’s Business Daily*
- *Financial Times* – United States Edition
- *Stocks & Commodities*
- *Barron’s*
- *Global Capital* – digital only
- *Hedge Fund Alert*
- *Grant’s Interest Rate Observer*
- *EuroMoney Magazine* – print and digital

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<sup>1</sup> See, e.g., *The Foreign Exchange and Interest Rate Derivatives Markets: Turnover in the United States*, Federal Reserve Bank of New York, at Annex II, April 2007 (listing more than 30 dealers, including G14 dealers).

# THE WALL STREET JOURNAL.

Publication Name/Website	<a href="https://www.wsj.com/">https://www.wsj.com/</a>
Media Tactics	Publish Summary Notice two times to U.S. audience
Publishing Frequency	Monday – Saturday
Circulation	1,322,000
Editorial Focus	Publishing original business news and financial information with expanded content in arts, culture, lifestyle, and sports.

# INVESTOR'S BUSINESS DAILY®

Publication Name/Website	<a href="https://www.investors.com/">https://www.investors.com/</a>
Media Tactics	Publish Summary Notice two times to U.S. audience
Publishing Frequency	Weekly on Monday; available online the Saturday prior
Circulation	90,000
Editorial Focus	An authoritative financial news and research organization recognized for its proprietary investing screens, investment ratings, and strong record of identifying market leaders as they emerge.



Publication Name/Website	<a href="https://www.ft.com/">https://www.ft.com/</a>
Media Tactics	Publish Summary Notice two times to U.S. audience
Publishing Frequency	Monday – Saturday
Circulation	28,879
Editorial Focus	One of the world's leading business and financial news publications providing essential news, commentary, data, and analysis for the global business community.

TECHNICAL  
ANALYSIS OF **STOCKS &  
COMMODITIES**

Publication Name/Website	<a href="http://traders.com/">http://traders.com/</a>
Media Tactics	Publish Summary Notice one time to U.S. audience; email blast of Summary Notice to digital subscribers; banner ads on e-newsletters; 30-day banner ad campaign
Publishing Frequency	Monthly
Circulation	Print Magazine – 34,000 E-newsletter – 200,000 Email Blast – 150,000
Editorial Focus	Provides information on how to apply technical analysis tools to charting, numerical, and computer methods for trading stocks, bonds, mutual funds, options, and commodities.

**BARRON'S**

Publication Name/Website	<a href="https://www.barrons.com/">https://www.barrons.com/</a>
Media Tactics	Publish Summary Notice two times to U.S. audience
Publishing Frequency	Weekly on Monday; available online the Saturday prior
Circulation	307,700
Editorial Focus	America's premier financial magazine, renowned for its market-moving stories. It reaches an audience of top corporate executives, institutional investors, and financial professionals.

## GlobalCapital

Publication Name/Website	<a href="https://www.globalcapital.com/">https://www.globalcapital.com/</a>
Media Tactics	Publish Summary Notice three times
Audience	Average monthly unique visitors 205,700
Editorial Focus	A leading news, opinion, and data service for people and institutions using and working in the international capital markets. It provides readers with clear voices and lively coverage of key markets based on the comments of those who work in them.

## GRANT'S

INTEREST RATE OBSERVER®

Publication Name/Website	<a href="https://www.grantspub.com/">https://www.grantspub.com/</a>
Media Tactics	Publish Summary Notice three times
Publishing Frequency	24 times annually
Circulation	6,200
Editorial Focus	An independent, value-oriented, and contrary-minded journal of the financial markets with clear and unconventional thinking, micro and macro analysis, and speculation about the future informed by knowledge of the past.

## Hedge Fund ALERT

Publication Name/Website	<a href="https://hfalert.com/">https://hfalert.com/</a>
Media Tactics	Publish Summary Notice one time in digital edition of magazine
Publishing Frequency	47 times annually
Circulation	2,500
Editorial Focus	Offers breaking news in the worldwide alternative investment business along with a steady flow of unbiased reporting on behind the scenes developments affecting fund managers, their investors, and service providers. Subscribers pay \$4,597 for an annual subscription.

# EUROMONEY

Publication Name/Website	<a href="https://www.euromoney.com/">https://www.euromoney.com/</a>
Media Tactics	Publish Summary Notice one time in print edition of magazine; 30- day digital ad campaign
Publishing Frequency	10 times annually
Circulation/Audience	34,000 print & digital versions of magazine; 264,000 average monthly website visitors
Editorial Focus	Leading authority for the worlds banking and financial markets they offer editorial and insights on capital markets, banking, fintech, treasury and foreign exchange. Their readers are some of the most influential figures in global banking and finance.

## Digital Media

A.B. Data recommends placing banner, search, and social media ads on a variety of websites and social media platforms, enabling maximum exposure and delivering the reach required to satisfy Rule 23 and due process. We recommend scheduling a 30-day campaign, which ensures ample time to deliver the targeted impressions. Approximately 18 million impressions are recommended to ensure potential Class Members are reached with the frequency needed for them to become aware of the Action. All banner and newsfeed ads will include embedded and trackable links to the case-specific website. Ad performance, links, and traffic will be tracked using Google Analytics, providing a way to optimize ads for visitors and traffic.

The digital media will be chosen first to meet audience notification requirements, and second to achieve maximum engagement with the ads. Ads will be served on apps targeted to the financial, trading, and investment communities to reach potential Class Members. Campaigns will be optimized to drive potential Class Members to visit the website. The following digital media platforms are recommended:



A mix of Internet banner and newsfeed ads will be run using the Google Display Network via its thousands of websites, as well as mobile devices and apps. Website categories that will be targeted include financial, investment, CFO, “C-suite,” and other finance and investment community decision makers.



LinkedIn is a social networking site designed specifically for the business community. It allows registered members to establish and document networks of people they know and trust professionally. Many keep an online list of professional contacts and business connections, search for new job opportunities, and post professional opinions and work-related information.

Newsfeed ads will be targeted to specific LinkedIn groups that have been formed to address businesspeople associated with the investment industry. Some of the targeted group categories include Euribor Derivatives, Euribor markets, Euribor Rates, Euribor Quotes, ISDA traders, commodities traders, financial advisors, institutional investors, portfolio managers, chief financial officers, pension directors, and many others.



To assist further in locating potential Class Members, A.B. Data will develop and monitor a Google AdWords and key search terms program. When identified target phrases and keywords are entered in a search by users in the target regions on Google and Google-syndicated search pages, links to the case website will appear on the search results pages.

Representative keywords could include “Euribor derivatives,” “Euribor markets,” “ISDA trading,” plus many others.

TECHNICAL  
ANALYSIS OF **STOCKS &  
COMMODITIES**

*Stocks & Commodities* magazine runs the website traders.com as the digital media component of their print publication. A 30-day banner ad campaign will be placed on the website, along with banner ads on their monthly e-newsletter sent to 200,000 subscribers and a custom email blast with the Summary Notice sent to approximately 150,000 recipients.

AdPulseMedia

A behaviorally targeted campaign will be purchased via a custom business, financial, and investment network on websites like Bloomberg.com, investors.com, Barchart.com, and marketwatch.com with ads served specifically to people who are searching or have previously searched for information on finances and investing. A sampling of the websites included in this network are listed below.

247wallst.com	investorguide.com
4-traders.com	investorplace.com
americanbulls.com	investors.com
barchart.com	istockanalyst.com
bloomberg.com	marketscreener.com
bloomberg.com/businessweek	marketwatch.com
bnnbloomberg.ca	money.cnn.com/investing
breakingfinancenews.com	nasdaq.com
businessinsider.com	nytimes.com/pages/business
businessnewsdaily.com	nytimes.com/section/business/dealbook
cnbc.com/investing	online.barrons.com
dailytradealert.com	pennystock.com
energystockchannel.com	reuters.com

etfchannel.com	reuters.com/finance
finance.yahoo.com	seekingalpha.com
financialpost.com	smallcapnetwork.com
finviz.com	stockcharts.com
fool.com	stockgumshoe.com
forbes.com	stockhouse.com
fortune.com	stockmarketadvantage.com
foxbusiness.com	stockwatch.com
ft.com	streetauthority.com
insidermonkey.com	thestreet.com
investing.com	valuwalk.com
investingchannel.com	wsj.com
investopedia.com	wsj.com/news/business
Zerohedge.com	zacks.com

### “Microtargeted” Digital Media

The following campaign microtargeting optimization strategies will be utilized to achieve maximum engagement with the ads.

Strategy	Rationale
Contextual Targeting	Targeting websites with relevant content and context, such as those that provide investment and financial information, will help capture potential Class Members who were not in previous data-targeting pools but have an interest in finance-related topics.
Behavioral Targeting	Targeting user IDs across the Internet whose owners have shown activity in the past or placed themselves in data pools of our audience tab. For example: ads may be

Strategy	Rationale
	targeted to a user who works in the investment industry and is interested in Euribor Futures or Options.
Predictive (Look-Alike) Modeling	With predictive modeling, look-alike modeling is deployed to target user IDs whose owners have strong similarities to users who have previously clicked through to the case website.
Customer Database Targeting	With customer databases that include physical addresses and/or email addresses, digital media can be served to those customers specifically, and also to audiences modeled on actual customers.

A.B. Data employs a fully staffed digital buying team to manage all digital and social media programs in-house for the greatest control and oversight. During the course of the digital notice schedule dates, A.B. Data's digital media experts will monitor the success, conversions, and activity associated with the digital and social media campaigns and will optimize the number of impressions delivered across each platform to achieve maximum engagement and efficiency. A.B. Data's digital media experts have the following certifications:

- Google Ads Display Certification
- Google Ads Search Certification
- Google Analytics Certification
- LinkedIn Ads Certification

With this level of expertise, digital and social media campaigns are ensured impressions are delivered to the target audience efficiently and effectively, with online ad verification and minimal threat of bot-traffic and inappropriate content. A.B. Data uses conversion tracking and website tags to monitor real-time performance of all ads, traffic, and website performance.

### **Earned Media**

In addition to the notice efforts involving print publications and digital media, A.B. Data recommends that a news release be disseminated via *PR Newswire*'s US1 Newswire distribution list to announce the Notice of Settlement. This news release will be distributed via *PR Newswire* to the news desks of approximately 10,000 newsrooms, including print, broadcast, and digital websites across the United States.

News about the Settlement will also be broadcast to the news media via Twitter. It will be tweeted from *PR Newswire*'s and A.B. Data's Twitter accounts to thousands of news media reporters and other followers.

## Notice Design Strategies

The Federal Rules of Civil Procedure require notices in class action cases to be written in “plain, easily understood language.” This process has been utilized in developing the Mailed Notice and the Summary Publication Notice for this case. A.B. Data is committed to adhering to the easily understood language requirement of Rule 23(c)(2) and Rule 23(b)(3).

The plain language Notice developed for this Plan will be designed to be easily seen by potential Class Members with a large, bold headline. The plain, easily understood language in the text of the Notice will allow potential Class Members the opportunity to read it at their leisure and ensure they understand the subject of the case, the steps they must take to join the Settlement Class, and the legal rights of all Class Members.

Each printed Summary Publication Notice will prominently display a mailing address, a toll-free telephone number, and a case website address so that potential Class Members may review the detailed Mailed Notice and other information available regarding the Settlement.

The online banner and newsfeed ads will be designed to alert potential Class Members and entities about the Settlement. The ads will each include a link to the case website so that potential Class Members may click on it and go directly to the website for Settlement information.

A sample banner ad is provided.



## Due Process

The Notice efforts described herein reflect a strategic, microtargeted, and contemporary method to deploy Notice to potential Class Members. The Notice Plan summarized in this document provides a reach and frequency similar to those that courts have approved and that are recommended by the

Federal Judicial Center's *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide*.

The Notice Plan described in this document is consistent with notice plans that A.B. Data has developed and have been approved by the Court in this Action and implemented for other similar securities and financial instrument cases with regard to the methods and tools for developing such plans.

This Notice Plan is, in A.B. Data's experience, the best practicable under the circumstances for the Settlement Class and meets due process requirements.

