

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

If You Transacted in Eurodollar Futures and/or Options on Eurodollar Futures on Exchanges such as the Chicago Mercantile Exchange (“CME”) between January 1, 2003 and May 31, 2011, inclusive (“Settlement Class Period”),

You May Be Eligible to Receive Payment of a Portion of Additional Settlement Funds of \$3.45 Million

If you previously submitted a valid claim in the Prior Settlements, you do not need to submit another Proof of Claim to participate in this Settlement unless you wish to amend your claim.

This is a final settlement of a class action lawsuit involving the alleged manipulation of U.S. Dollar LIBOR and its impact on Eurodollar Futures and/or Options on Eurodollar Futures (“Eurodollar Futures”) that are linked to U.S. Dollar LIBOR. If approved, the proposed Settlement of \$3.45 million with the Remaining Defendants would completely resolve the pending litigation in the Exchange-Based Action.

- *A United States Federal Court authorized this Notice. This is not a solicitation from a lawyer. This is a Settlement with the Remaining Defendants – namely, Credit Suisse AG (“Credit Suisse”), Lloyds Bank plc and Bank of Scotland plc (together, “Lloyds”), NatWest Markets plc (f/k/a The Royal Bank of Scotland plc) (“NatWest”), Portigon AG (f/k/a WestLB) and Westdeutsche Immobilienbank AG (n/k/a Westdeutsche Immobilien Servicing AG) (together, “Portigon”), Royal Bank of Canada and RBC Capital Markets, LLC (together, “RBC”), Coöperatieve Rabobank U.A. (f/k/a/ Coöperatieve Centrale Raiffeisen-Boerenleenbank B.A.) (“Rabobank”), The Norinchukin Bank (“Norinchukin”), MUFG Bank, Ltd. (f/k/a The Bank of Tokyo-Mitsubishi UFJ, Ltd.), and UBS AG (“UBS”) (together Credit Suisse, Lloyds, NatWest, Portigon, RBC, Rabobank, Norinchukin, MUFG, and UBS are referred to the “Remaining Defendants”) – in a class action lawsuit about the alleged price-fixing, suppression and manipulation of the U.S. Dollar London Interbank Offered Rate (“LIBOR” or “U.S. Dollar LIBOR”). The settlement price of Eurodollar futures directly incorporates U.S. Dollar LIBOR.*
- *The Settlement brings the total settlement amount in the Exchange-Based Action to \$190,450,000. The Court previously granted Final Approval for settlements in this Action, which created an aggregate Settlement Fund of \$187,000,000. On October 24, 2023, the Court authorized distribution of the aggregate Settlement Fund and the distribution process is ongoing. If the Court approves this Settlement for \$3,450,000, a separate distribution motion will be made once the claims administration process is completed.*
- *The lawsuit claims that the Remaining Defendants (see Question 3) unlawfully suppressed and/or manipulated the U.S. Dollar LIBOR rates which caused the price of Eurodollar futures to be suppressed or inflated to artificial levels, thereby causing Settlement Class Members to pay artificial prices for Eurodollar futures during the Settlement Class Period. The Remaining Defendants deny this claim and maintain they did nothing wrong.*
- *You are a “Settlement Class Member” included in the Settlement, and are entitled to seek a payment, if you transacted in any LIBOR-based Eurodollar futures and/or options on Eurodollar futures on exchanges such as the CME at any time between January 1, 2003 and May 31, 2011, inclusive (see Question 7). Settlement Class Members will release claims through this Settlement only against the Remaining Defendants and their affiliated persons and entities (see Question 14).*
- *The Settlement will pay individuals and institutions that transacted in Eurodollar futures and/or options on Eurodollar futures between January 1, 2003 and May 31, 2011, inclusive.*

QUESTIONS? CALL 1-800-918-8964 OR VISIT www.USDLiborEurodollarSettlements.com

- **Your legal rights are affected even if you do nothing. Please read this Notice carefully.**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM EITHER POSTMARKED BY MAIL or ELECTRONICALLY FILED ON THE SETTLEMENT WEBSITE NO LATER THAN OCTOBER 21, 2024	This is the only way to get a payment. <i>See</i> Question 15.
ASK TO BE EXCLUDED BY SUBMITTING A WRITTEN REQUEST POSTMARKED NO LATER THAN AUGUST 15, 2024	You will get no monetary benefits from the Settlement. This is the only option that allows you to independently assert the claims released by this Settlement against the Remaining Defendants about the alleged U.S. Dollar LIBOR manipulation affecting Eurodollar futures and/or options on Eurodollar futures that are at issue in this case. <i>See</i> Question 17.
OBJECT TO THE SETTLEMENT BY SUBMITTING A WRITTEN OBJECTION POSTMARKED BY MAIL NO LATER THAN AUGUST 15, 2024	If you wish to object to the Settlement, or anything else mentioned in this Notice, you must file a written objection. <i>See</i> Question 22.
GO TO THE FAIRNESS HEARING ON SEPTEMBER 5, 2024 AT 11:30 A.M., AND FILE A NOTICE OF INTENTION TO APPEAR NO LATER THAN AUGUST 22, 2024	You may also request to be heard at the Fairness Hearing. <i>See</i> Question 26.
DO NOTHING	You will forfeit your right to get a monetary benefit from the Settlement and give up your rights to assert claims released by these Settlement against the Remaining Defendants about the alleged U.S. Dollar LIBOR manipulation and its alleged impact on Eurodollar Futures that are at issue in this case.

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still must decide whether to approve the Settlement. Payments will not be made unless the Court approves the Settlement, and after any appeals regarding settlement approval are resolved.

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BASIC INFORMATION

1. Why did I receive this Notice?

A Court authorized this Notice because you have a right to know about the proposed Settlement with the Remaining Defendants in this class action lawsuit and about all your options before the Court decides whether to give final approval to the Settlement. This Notice explains the lawsuit, the Settlement, and your legal rights.

Judge Naomi Reice Buchwald of the United States District Court for the Southern District of New York is overseeing this case. This litigation has been consolidated within *In re LIBOR-Based Financial Instruments Antitrust Litigation*, MDL No. 2262. The Settlement relates to an action referred to as the “Exchange-Based Plaintiffs’ Action” because it involves Plaintiffs who transacted in Eurodollar Futures and options on exchanges such as the CME.

2. What is this lawsuit about?

The Exchange-Based Plaintiffs (also referred to as “Plaintiffs”) (*see* Question 5), who transacted in Eurodollar futures contracts and options on Eurodollar futures (*see* Question 9), sued various banks (and certain of their affiliates) (“Defendants,” *see* Question 3), claiming that the banks individually and collectively manipulated U.S. Dollar LIBOR to benefit their trading positions and engaged in the suppression of LIBOR. Plaintiffs alleged that the banks’ alleged conduct manipulated Eurodollar Futures prices to artificial levels between January 1, 2003 and May 31, 2011, inclusive. As a result, Exchange-Based Plaintiffs claim that they traded Eurodollar futures contracts at artificial price levels, paying more and/or receiving less than they would have absent Defendants’ manipulation of the U.S. Dollar LIBOR rate. The alleged manipulation of Defendants’ LIBOR submissions caused the Settlement Class to pay higher supracompetitive prices or receive lower infracompetitive prices for Eurodollar futures contracts and options on Eurodollar futures during the Settlement Class Period. Exchange-Based Plaintiffs brought claims under the Sherman Antitrust Act, 15 U.S.C. § 1 *et seq.*, and Commodity Exchange Act, 7 U.S.C. § 1 *et seq.* (“CEA”), against the Defendants seeking money damages. The Court has written at least seven published opinions addressing various legal matters raised by the parties in this lawsuit. Since the filing of the first civil LIBOR action on April 15, 2011, the Court has limited Plaintiffs’ claims in various ways, including by dismissing portions of Plaintiffs’ antitrust claims under the efficient enforcer standard, dismissing most foreign Defendants for lack of personal jurisdiction, and dismissing portions of Plaintiffs’ CEA claims as untimely, based on the Court’s findings that Plaintiffs were on inquiry notice of the claims and that the two-year statute of limitations had expired on Plaintiffs’ CEA claims in so-called “Periods 1 and 2” (August 2007 to April 14, 2009). The Court denied Plaintiffs’ motion for class certification. In its ruling, *In re LIBOR-based Fin. Instruments Antitrust Litig.* (“*LIBOR VII*”), 299 F. Supp. 3d 430 (S.D.N.Y. 2018), the Court denied class certification, rejected various econometric models and opinions of Plaintiffs’ experts as to liability and damages, and ruled that Plaintiffs had not fully satisfied the requirements of Federal Rule of Civil Procedure 23. Plaintiffs’ petition for leave to appeal the denial of class certification under Federal Rule 23(f) was denied. Given the procedural history of this lawsuit, the Settlement described herein may offer the best, and perhaps last, chance for Settlement Class Members to obtain additional monetary recoveries.

The Court previously granted Final Approval for seven settlements in this Action,¹ which created an aggregate Settlement Fund of \$187,000,000. On October 24, 2023, the Court authorized distribution of the aggregate Settlement Fund (ECF No. 3840) and the distribution process is ongoing. The additional and final Settlement of \$3.45 million has been reached between Exchange-Based Plaintiffs and the Remaining Defendants Credit Suisse, Lloyds, NatWest, Portigon, RBC, Rabobank, Norinchukin, MUFG, and UBS, and that is why you are receiving this Notice. The Remaining Defendants deny all claims asserted against them and maintain they did nothing wrong.

¹ On September 17, 2020, this Court granted Final Approval of settlements with: (i) Bank of America Corporation and Bank of America, N.A. (collectively, “BOA”); (ii) Barclays Bank plc (“Barclays”); (iii) Citigroup Inc., Citibank, N.A., and Citigroup Global Markets Inc. (collectively, “Citi”); (iv) Deutsche Bank AG, Deutsche Bank Securities Inc., and DB Group Services (UK) Ltd. (collectively, “Deutsche Bank”); (v) HSBC Bank plc (“HSBC”); (vi) JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. (collectively, “JPMorgan”); and; (vii) Société Générale (collectively, “Prior Settlements”). *See* ECF Nos. 3175-80.

3. Who are the Remaining Defendants in the Exchange-Based Plaintiffs' Action?

The Remaining Defendants in the Exchange-Based Plaintiffs' Action are:

- Credit Suisse Group AG (“Credit Suisse”);
- Lloyds Bank plc and Bank of Scotland plc (together, “Lloyds”);
- NatWest Markets plc (f/k/a The Royal Bank of Scotland plc) (“NatWest”);
- Portigon AG (f/k/a WestLB) and Westdeutsche Immobilienbank AG (n/k/a Westdeutsche Immobilien Servicing AG) (together, “Portigon”);
- Royal Bank of Canada and RBC Capital Markets, LLC (together, “RBC”);
- Coöperatieve Rabobank U.A. (f/k/a/ Coöperatieve Centrale Raiffeisen-Boerenleenbank B.A.) (“Rabobank”);
- The Norinchukin Bank (“Norinchukin”);
- MUFG Bank, Ltd. (f/k/a The Bank of Tokyo-Mitsubishi UFJ, Ltd.); and
- UBS AG (“UBS”).

4. Are there other LIBOR lawsuits?

Yes. Numerous cases were filed in various courts on behalf of different entities and individuals who were allegedly affected by the alleged manipulation of LIBOR by Defendants. Many of those cases were transferred to the U.S. District Court for the Southern District of New York and have been consolidated as: *In re LIBOR-Based Financial Instruments Litigation*, 11-MD-2262. This Settlement is made with Plaintiffs in the Exchange-Based Plaintiffs' Action only.

5. Why is this a class action?

In a class action, one or more persons or entities called “class representatives” sue on behalf of themselves and other persons or entities with similar claims. All of these persons or entities together are called the “class” or “class members.” In this Settlement, the Exchange-Based Plaintiffs, Metzler Asset Management GmbH (f/k/a Metzler Investment GmbH), FTC Futures Fund SICAV, FTC Futures Fund PCC Ltd., Atlantic Trading USA, LLC, 303030 Trading LLC, Gary Francis, and Nathaniel Haynes, are the Class Representatives. The Exchange-Based Plaintiffs allege that all other individuals and entities that transacted in Eurodollar futures and Eurodollar options contracts were also affected by Defendants' alleged manipulation of U.S. Dollar LIBOR. One court resolves the issues for all class members, referred to herein as the Settlement Class Members, except for those who exclude themselves from the Exchange-Based Plaintiffs' Class.

6. Why is there a Settlement?

The Court has not decided in favor of the Exchange-Based Plaintiffs or Remaining Defendants. Having assessed a number of relevant factors, the Exchange-Based Plaintiffs have separately agreed with Remaining Defendants to settle the litigation. A settlement is neither an admission of liability by Remaining Defendants nor an admission of deficiencies in their claim by Exchange-Based Plaintiffs. By agreeing to settle, the Parties avoid the costs and uncertainty of a trial, and the Settlement Class Members will get a chance to receive compensation. The Exchange-Based Plaintiffs and their attorneys believe the Settlement is in the best interests of all Settlement Class Members.

WHO IS IN THE SETTLEMENT?

If you received mailed notice of the Settlement or previously submitted a claim in this Action, then you may be a Settlement Class Member. But even if you did not receive a notice, you may be a Settlement Class Member, as described below.

QUESTIONS? CALL 1-800-918-8964 OR VISIT www.USDLiborEurodollarSettlements.com

7. How do I know if I am part of the Settlement?

If you previously submitted a valid claim in the Prior Settlements, you do not need to submit another Proof of Claim to participate in this Settlement unless you wish to amend your claim.

You are included in the Settlement as a Settlement Class Member, if you meet the definition below:

All Persons, corporations and other legal entities that transacted in Eurodollar futures and/or options on Eurodollar futures on exchanges, including without limitation, the Chicago Mercantile Exchange, between January 1, 2003 and May 31, 2011, inclusive.

Excluded from the Settlement Class are: (i) Defendants, their employees, affiliates, parents, subsidiaries, and alleged co-conspirators; (ii) the Releasees (as defined in the Settlement Agreement); and (iii) any Class Member who files a timely and valid request for exclusion. Notwithstanding these exclusions, and solely for the purposes of the Settlement and the Settlement Class, Investment Vehicles shall not be excluded from the Settlement Class solely on the basis of being deemed to be Defendants or affiliates or subsidiaries of Defendants. However, to the extent that any Defendant or any entity that might be deemed to be an affiliate or subsidiary thereof (i) managed or advised, and (ii) directly or indirectly held a beneficial interest in, said Investment Vehicle during the Class Period, that beneficial interest in the Investment Vehicle is excluded from the Settlement Class.

8. What is the London Interbank Offered Rate (“LIBOR”)?

The London Interbank Offered Rate (“LIBOR”) is the reference point for determining interest rates for financial instruments worldwide. LIBOR rates are determined for several currencies, including the U.S. Dollar, for multiple borrowing periods ranging from overnight to one year. They are published each business day. U.S. Dollar LIBOR is the trimmed average of the rates at which an individual bank on the U.S. Dollar LIBOR panel could borrow funds, were it to do so by asking for and then accepting offers in the London inter-bank market in reasonable market size, just prior to 11:00 am London time. The Settlement only involves U.S. Dollar LIBOR.

9. Which Eurodollar futures and options are covered by the Settlement?

The Settlement covers Eurodollar futures and options on Eurodollar futures transacted on exchanges, such as the CME, during the period between January 1, 2003 and May 31, 2011, inclusive.

10. What if I am not sure whether I am included in the Settlement?

If you are not sure whether you are included in the Settlement, you may call 1-800-918-8964 with questions or visit www.USDLiborEurodollarSettlements.com. You may also write with questions to USD Libor Eurodollar Futures Settlements c/o A.B. Data, Ltd., P.O. Box 170999, Milwaukee, WI 53217-8091 or email info@USDLiborEurodollarSettlements.com.

THE SETTLEMENT BENEFITS

11. What does the Settlement provide?

The Remaining Defendants have agreed to pay \$3.45 million. The Settlement, if it receives Final Approval from the Court, will create an additional \$3.45 million Settlement Fund that will be used to pay eligible Settlement Class Members who submit valid claims. **If you previously submitted a valid claim in the Prior Settlements, you do not need to submit another Proof of Claim to participate in this Settlement unless you wish to amend your claim.** The cost to

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administer the Settlement, attorneys' fees, and reimbursement of litigation costs and expenses will come out of the Settlement Fund, if the Court approves applications for such payments from the Settlement Fund (*see* Question 21). More details are in Settlement Agreement, which is available at www.USDLiborEurodollarSettlements.com.

12. How much will my payment be?

Payments from the Settlement Fund will be distributed to Eligible Class Members *pro rata*, after deduction of any fees, expenses and other allowed deductions (*see* Question 21). Eligible Class Members are Settlement Class Members who timely file a valid proof of claim. **If you previously submitted a valid claim in the Prior Settlements, you do not need to submit another Proof of Claim to participate in this Settlement unless you wish to amend your claim.** The distribution will be made in accordance with and pursuant to a plan of distribution (the "Plan of Distribution" or "Plan"). A proposed Plan has been submitted to the Court in advance of the Final Approval Hearing. The proposed Plan is enclosed with this Notice and made available at www.USDLiborEurodollarSettlements.com.

The Plan provides for three types of payments to be made to distribute the funds: 1) approximately 97% of the anticipated net settlement funds will be distributed to Eligible Class Members based upon their net losses caused by "price artificiality"; 2) approximately 1.1316% of the face amount of the approved settlements will be distributed based on the net losses of each eligible Settlement Class Member from transactions which were opened and closed during specified periods; and 3) a guaranteed minimum payment of at least \$20 will be made to each eligible Settlement Class Member. The amount of "price artificiality" with respect of certain transactions will be subject to certain discounts. Also, any eligible Settlement Class Members who purchased and sold specific Eurodollar Futures on the same day will have no net loss from "price artificiality" on that contract. This is because the same daily amount of "price artificiality" will apply to both the purchase and sale leg of the transaction. Accordingly, the amount of unfavorable impact will equal the amount of favorable impact, and there will be no net loss from artificiality related to any such transaction.

The foregoing summary is qualified in all respects by the full terms of the Plan. See enclosed Plan or see www.USDLiborEurodollarSettlements.com.

Settlement Class Members will have the option to comment or object to any portion of the Plan at the Fairness Hearing (*see* "The Fairness Hearing" below). The Settlement Agreement will remain in place if the Court rejects or alters the proposed Plan.

13. When will I receive my payment?

Settlement Class Members who are entitled to payments will receive their payments after the Court grants final approval to the Settlement and after any appeals relating to the Settlement is resolved. If there are appeals relating to the Settlement or the settlement approval proceedings, resolving them can take time. Please be patient.

14. What am I giving up by staying in the Settlement Class?

Unless you exclude yourself from the Settlement Class, you will give up your right to sue Credit Suisse, Lloyds, NatWest, Portigon, RBC, Rabobank, Norinchukin, MUFG, and UBS and their affiliated persons and entities for the claims being resolved by the Settlement. The specific claims you are giving up against the Remaining Defendants and all related parties are fully described in Settlement Agreement available for review at www.USDLiborEurodollarSettlements.com: see paragraphs 1(KK), 1(LL), 1(MM), 1(XX), 11(A), and 11(B) of the Settlement Agreement. You will be "releasing" the Remaining Defendants and all related persons and entities as described in the Settlement Agreement.

The released claims *do not*, however, include the following:

- Claims to enforce any of the terms of the Settlement Agreement in this case;

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- Claims concerning U.S. Dollar LIBOR-based instruments such as asset swaps, collateralized debt obligations, credit default swaps, forward rate agreements, inflation swaps, interest rate swaps, total return swaps, options, or floating rate notes arising from or relating in any way to the conduct alleged in the OTC Plaintiffs’ Action (No. 11 Civ. 5450 (NRB), pending in the Southern District of New York), that are not released by this final Exchange-Based Plaintiffs’ Settlement;
- Claims concerning U.S. Dollar LIBOR-based debt securities such as government and municipal bonds, corporate bonds, asset-based securities, mortgage-backed securities and collateralized debt obligations arising from or relating in any way to the conduct alleged in the Bondholder Plaintiffs’ Action (No. 12 Civ. 1025 (NRB), pending in the Southern District of New York), that are not released by this final Exchange-Based Plaintiffs’ Settlement; or
- Any other claims that do not arise out of the factual predicate of the Exchange-Based Plaintiffs’ Action.

The Settlement Agreement, available at www.USDLiborEurodollarSettlements.com, describe the released claims and released persons in more detail, so please read carefully. If you have any questions, you can talk to the law firms listed in Question 20 at no cost to you. You may also speak with your own lawyer if you have questions about this Notice or the Exchange-Based Plaintiffs’ Action.

HOW TO RECEIVE A PAYMENT

15. How can I receive a payment?

To ask for a payment, you will need to complete and submit a Proof of Claim and Release Form postmarked OR submitted electronically no later than **October 21, 2024**. **If you previously submitted a valid claim in the Prior Settlements, you do not need to submit another Proof of Claim to participate in this Settlement unless you wish to amend your claim.** Instructions for electronic claims submission are available at www.USDLiborEurodollarSettlements.com. If you submit a Proof of Claim and Release Form with your contact information, you will receive future notifications containing additional important information. You may also download and mail your completed Proof of Claim and Release form to:

USD Libor Eurodollar Futures Settlements
 c/o A.B. Data, Ltd.
 P.O. Box 170999
 Milwaukee, WI 53217-8091

Any claims that are not released do not qualify for payment in the Settlement (*see* Question 14).

16. What if my claim is rejected?

The Settlement provides a process for Settlement Class Members to contest the rejection of a claim. You will get further details in the letter you will receive after your claim has been processed. If your claim is rejected, you may request a review. You will need to do so in writing and submit reasons for why you are contesting the rejection, along with any supporting documentation. If your dispute cannot be resolved, it may be presented to the Court for review. The Court’s decision will be final and binding. More details are in the relevant Settlement Agreement, which is available at www.USDLiborEurodollarSettlements.com.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you want to retain the right to sue Credit Suisse, Lloyds, NatWest, Portigon, RBC, Rabobank, Norinchukin, MUFG, and UBS about the issues in the Exchange-Based Plaintiffs’ Action, and if you are willing to forgo a payment from the

QUESTIONS? CALL 1-800-918-8964 OR VISIT www.USDLiborEurodollarSettlements.com

Settlement, then you must take steps to exclude yourself from the Settlement Class. This is called excluding yourself and sometimes referred to as “opting out” of the Settlement Class.

17. How do I request exclusion from the Settlement?

To exclude yourself from the Settlement, you must mail a letter or other written document (“Request for Exclusion”) to the Settlement Claims Administrator, A.B. Data, Ltd. (the “Claims Administrator”). To exclude yourself from the Settlement, you must file a timely written Request for Exclusion.

A Request for Exclusion must:

- Be in writing;
- Be signed by you or your authorized representative;
- State your name, address, and phone number;
- Include proof of membership in the Settlement Class, specifically, a description of and documentation evidencing your transactions that fall within the Settlement Class definition (including, for each transaction, the identity of the broker (if any), the date of the transaction, the type of the transaction, the counterparty (if any), the exchange on which the transaction occurred, any transaction identification numbers, the rate, and the notional amount of the transaction);
- Include a signed statement that “I/we hereby request that I/we be excluded from the proposed Exchange-Based Settlement Class in the *In re LIBOR-based Financial Instruments Antitrust Litigation*, MDL No. 2262”; and
- Be mailed to the Claims Administrator at the address provided below and postmarked no later than **August 15, 2024**.

You must also provide any other information reasonably requested by the Claims Administrator. You must mail your Request for Exclusion, postmarked no later than **August 15, 2024**, to USD Libor Eurodollar Futures Settlements, EXCLUSIONS, c/o A.B. Data, Ltd., P.O. Box 170999, Milwaukee, WI 53217-8091.

18. If I do not exclude myself, can I sue any of the Remaining Defendants for the same thing later?

No. Unless you exclude yourself by the deadline stated above, you give up the right to sue any of the Remaining Defendants for the claims that you release through this Settlement.

19. If I exclude myself, can I still receive a payment from the Settlement?

No. You will not get a payment in connection with this final Settlement in the Exchange-Based Plaintiffs’ Action if you exclude yourself from this Settlement.

THE LAWYERS REPRESENTING YOU

20. Do I have a lawyer in the case?

The Court has appointed two law firms – Kirby McInerney LLP and Lovell Stewart Halebian Jacobson LLP – to represent all Exchange-Based Settlement Class Members as “Settlement Class Counsel.” They can be contacted at:

David E. Kovel
KIRBY MCINERNEY LLP
250 Park Avenue, Suite 820
New York, NY 10177

Christopher Lovell
LOVELL STEWART HALEBIAN
JACOBSON LLP
500 5th Avenue - Suite 2440
New York, New York 10110

QUESTIONS? CALL 1-800-918-8964 OR VISIT www.USDLiborEurodollarSettlements.com

You will not be charged for contacting these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

21. How will the lawyers be paid?

Settlement Class Counsel will ask the Court for attorneys’ fees of up to one third of the \$3,450,000 Settlement Fund, as well as reimbursement for litigation costs and expenses. The fees and expenses awarded by the Court will be paid out of the Settlement Funds. The Court will decide the amount of fees to award. Settlement Class Members who do not exclude themselves from the Settlement may object to Settlement Class Counsel’s request for attorneys’ fees and reimbursement of litigation costs and expenses (*see* Question 22).

OBJECTING TO THE SETTLEMENT

22. How do I tell the Court if I oppose the Settlement?

Any member of the Settlement Class may appear at the Fairness Hearing in person or by counsel (at his, her or its own expense) and may be heard, to the extent allowed by the Court, either in support of or in opposition to the fairness, reasonableness, and adequacy of any or all of the proposed Settlement or any related matter (including the request for attorneys’ fees and expenses, the Plan of Distribution or any other matter). To object to any or all of the proposed Settlement, you must submit a letter or other written document that includes the following:

- Your name, address, and telephone number;
- A statement saying that you object to the Settlement with the Remaining Defendants Credit Suisse, Lloyds, NatWest, Portigon, RBC, Rabobank, Norinchukin, MUFG, and UBS in the Exchange-Based Plaintiffs’ Action in *In re LIBOR-based Financial Instruments Antitrust Litigation*, MDL No. 2262;
- Whether you plan to appear at the Fairness Hearing (*see* Question 26);
- Proof of membership in the Settlement Class, specifically, a description of and documentation evidencing your transactions that fall within the Settlement Class definition (including, for each transaction, the identity of the broker (if any), the date of the transaction, the type of the transaction, the counterparty (if any), the exchange on which the transaction occurred, any transaction identification numbers, the rate, and the notional amount of the transactions);
- The specific reasons you object to the Settlement, along with any supporting materials or documents that you want the Court to consider; and
- Your signature.

Your objection(s) must be mailed to the addresses listed below with a postmark no later than **August 15, 2024**. **Persons who have timely submitted a valid request for exclusion are not members of the Settlement Class and are not entitled to object.**

To object to the Settlement:

COURT	SETTLEMENT CLASS COUNSEL	REMAINING DEFENDANTS’ COUNSEL
Hon. Naomi Reice Buchwald Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007	David E. Kovel Kirby McInerney LLP 250 Park Avenue, Suite 820 New York, NY 10177 AND Christopher Lovell	On Behalf of Credit Suisse: Joel Kurtzberg Cahill Gordon & Reindel LLP 32 Old Slip New York, NY 10005 On behalf of Lloyds:

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	<p>Lovell Stewart Halebian Jacobson LLP 500 5th Avenue - Suite 2440 New York, NY 10110</p>	<p>Marc J. Gottridge Herbert Smith Freehills New York LLP 450 Lexington Avenue New York, NY 10017</p> <p>On behalf of MUFG: Christopher Viapiano Sullivan & Cromwell LLP 1700 New York Avenue, N.W. Suite 700 Washington, DC 20006</p> <p>On behalf of Norinchukin: Andrew W. Stern Sidley Austin LLP 787 Seventh Avenue New York, NY 10019</p> <p>On behalf of Rabobank: David R. Gelfand Milbank LLP 55 Hudson Yards New York, NY 10001</p> <p>On behalf of RBC: Brian J. Poronsky Katten Muchin Rosenman LLP 525 West Monroe Street Chicago, IL</p> <p>On behalf of NatWest: Davis S. Lesser King & Spalding LLP 1185 Avenue of the Americas, 34th Floor New York, NY 10036</p> <p>On behalf of Portigon: Christopher M. Paparella Justin Ben-Asher Steptoe LLP 1114 Avenue of the Americas New York, NY 10036</p> <p>On behalf of UBS: Eric J. Stock Jefferson E. Bell Gibson, Dunn & Crutcher LLP 200 Park Avenue New York, NY 10166</p>
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If your objection is not postmarked by the deadline and do not include the information listed above, the objections will not be valid and may not be considered by the Court.

23. What is the difference between objecting and asking to be excluded?

Objecting is simply telling the Court that you oppose something about the Settlement. You can object only if you remain a member of the Settlement Class and do not exclude yourself from it. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class with respect to the Settlement. If you exclude yourself from the Settlement Class, you will forfeit any claim to payment under the Settlement and you will have no basis to object because the Settlement no longer affect you. If you choose to exclude yourself or object to the Settlement, Court filings of exclusions and objections will publicly reveal your identity.

THE FAIRNESS HEARING

The Court will hold a hearing (“Fairness Hearing”) to decide whether to approve the proposed Settlement, the proposed Plan of Distribution, and any requests for fees and expenses. You may attend and you may ask to speak, but you do not have to.

24. When and where will the Court decide whether to approve the Settlement?

The Court will hold the Fairness Hearing at 11:30 a.m. on **September 5, 2024**, at the Daniel Patrick Moynihan United States Courthouse, Southern District of New York, 500 Pearl St., New York, NY 10007, Courtroom 21A. The Fairness Hearing may be moved to a different location or time without additional notice, so you are advised to check www.USDLiborEurodollarSettlements.com or call 1-800-918-8964 if you are intending to attend the hearing. At this hearing, the Court will consider whether the Settlement, the Plan of Distribution, and any proposed fees and expenses are fair, reasonable, and adequate. If there are objections, the Court will consider them and will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay Settlement Class Counsel. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take.

25. Do I have to attend the hearing?

No. Settlement Class Counsel will represent the interests of the Settlement Class at the Fairness Hearing. You or your own lawyer are welcome to attend at your expense. If you send an objection, you do not have to come to Court to talk about it. As long as your written objection is postmarked by August 15, 2024, the Court will consider it. You may also have your own lawyer attend, at your expense, but it is not necessary.

26. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. To speak at the Fairness Hearing, you must send a letter or other written document saying that the letter or document is your “Notice of Intention to Appear” at the Fairness Hearing in the Exchange-Based Plaintiffs’ Action in *In re LIBOR-based Financial Instruments Antitrust Litigation*, MDL No. 2262. Be sure to include your name, address, telephone number, and your signature. You must send your “Notice of Intention to Appear” to the relevant addresses listed in Question 22, so that it is postmarked no later than **August 22, 2024**.

GETTING MORE INFORMATION

27. How do I get more information?

This Notice summarizes the proposed Settlement and related procedures. More details are available is in the Settlement Agreement. You can obtain a copy of the Settlement Agreement at www.USDLiborEurodollarSettlements.com. You

QUESTIONS? CALL 1-800-918-8964 OR VISIT www.USDLiborEurodollarSettlements.com

also may call or write to the Claims Administrator with questions regarding the Exchange-Based Plaintiffs' Action, the Settlements, your rights under the Settlement or the filing of claims to USD Libor Eurodollar Futures Settlements c/o A.B. Data, Ltd., P.O. Box 170999, Milwaukee, WI 53217-8091 or call the toll-free number, 1-800-918-8964. A Proof of Claim Form is provided with this Notice. You can obtain additional Proof of Claim and Release forms at the website, or by calling the toll-free number, 1-800-918-8964.

28. Information for Nominees or Brokers

If, during the Settlement Class Period, you transacted in any U.S. Dollar LIBOR-based Eurodollar futures and/or options on Eurodollar futures for the beneficial interest of a person or organization other than yourself, the Court has directed that, **WITHIN SEVEN (7) CALENDAR DAYS OF YOUR RECEIPT OF THIS NOTICE**, you must either:

- (a) provide to the Claims Administrator (at the below address) the name and last known address of each person or organization for whom or which you held such U.S. Dollar LIBOR-based Eurodollar futures and/or options on Eurodollar futures during the Settlement Class Period, and the Claims Administrator will send a copy of the Notice to each identified beneficial owner, or
- (b) request additional copies of this Notice, which will be provided to you free of charge, and within seven (7) CALENDAR DAYS, mail the Notice directly to the beneficial owners.

You are entitled to reimbursement from the Settlement Fund of your reasonable expenses, actually incurred in connection with the foregoing, including reimbursement of postage expense and the cost of ascertaining the names and addresses of beneficial owners. Those expenses will be paid upon request and submission of appropriate supporting documentation. All communications concerning the foregoing should be addressed to the Claims Administrator at the following address:

USD LIBOR EURODOLLAR FUTURES SETTLEMENT
c/o A.B. DATA, LTD.
P.O. BOX 170999
MILWAUKEE, WI 53217-8091
info@USDLiborEurodollarSettlements.com

DO NOT TELEPHONE OR WRITE THE DISTRICT COURT OR THE OFFICE OF THE CLERK OF THE COURT REGARDING THIS NOTICE.

Dated: April 26, 2024

BY ORDER OF THE DISTRICT COURT
United States District Court
Southern District of New York

QUESTIONS? CALL 1-800-918-8964 OR VISIT www.USDLiborEurodollarSettlements.com