



LOWEY DANNENBERG, P.C.

August 1, 2022

**Via ECF**

The Honorable Lewis A. Kaplan  
United States Courthouse  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *Dennis, et al. v. JPMorgan Chase & Co., et al.*, 16-CV-6496 (LAK) (S.D.N.Y.)**

Dear Judge Kaplan:

We are counsel for Plaintiffs and, pursuant to the Court's Orders granting conditional certification entered on May 11, 2022<sup>1</sup> and the Orders approving the Class Notice plan entered February 1, 2022 and amended on May 11, 2022,<sup>2</sup> we write to respectfully submit the declaration ("Declaration") from the Settlement Administrator, A.B. Data, Ltd. ("A.B. Data") regarding its distribution of the Class Notice.

A.B. Data has implemented a multifaceted notice plan, described in the Declaration of Linda Young, dated March 2, 2021 (ECF No. 452-3), that incorporated elements including (1) establishment of a case-specific website, BBSWSettlement.com, containing copies of the settlements, Class Notice, and other case-related documents; (2) dissemination of a news release via *PR Newswire* to thousands of news outlets and social media accounts; (3) banner advertisements on investing-related websites; (4) print advertisements in outlets such as the *Wall Street Journal*, *Investors' Business Daily* and *Financial Times*; and (5) direct mail notice to market participants, A.B. Data's proprietary list of banks, brokers and nominees, and Settling Defendants' counterparties. As further detailed in the Declaration, A.B. Data has complied with the notice program approved by the Court. The print, digital and social media efforts have achieved over 5.4 million impressions, and Class Notice has been mailed to over 52,000 potential Class Members, including Settling Defendants' counterparties. On July 29, 2022, Plaintiffs received a supplemental production of counterparty information from The Royal Bank of Scotland plc (n/k/a NatWest Markets plc) ("RBS") that will result in a small additional mailing that will be completed by A.B. Data no later than August 3, 2022, if not sooner. Due to data privacy restrictions, BNP Paribas, S.A. ("BNPP") and Credit Suisse AG ("Credit Suisse") continue to work to facilitate the mailing of Class Notice to certain of their counterparties, and expect to complete their mailings by August 12, 2022 if not sooner. Based on our experience, Plaintiffs anticipate that these mailings will largely duplicate the work A.B. Data has performed.

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<sup>1</sup> ECF Nos. 542, 544

<sup>2</sup> ECF Nos. 525-30, 543.



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We are available to answer any questions that the Court may have.

Respectfully submitted,

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

/s/Christopher McGrath  
Lovell Stewart Halebian Jacobson LLP

cc: All Counsel of Record (via ECF)

Encl.