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BY ELECTRONIC MAIL

The Honorable Lewis A. Kaplan
United States District Court Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312
KaplanNYSDCChambers@nysd.uscourts.gov

**Granted.
So Ordered.**

/s/ Lewis A. Kaplan U.S.D.J. /PCM
Dated: 9/1/2021

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

Dear Judge Kaplan:

As counsel for Plaintiffs, we write to respectfully request a forty-five (45) day extension—from September 2, 2021 to October 18, 2021—in the time for Plaintiffs to submit a consolidated motion seeking conditional certification of Plaintiffs’ proposed settlements with defendants (1) Australia and New Zealand Banking Group Ltd. (“ANZ”); (2) Commonwealth Bank of Australia (“CBA”); (3) National Australia Bank Limited (“NAB”); and (4) Morgan Stanley and Morgan Stanley Australia Limited (“Morgan Stanley”). *See* ECF No. 472. The foregoing defendants consent to the requested extension. One prior extension of the conditional certification motion deadline has been made with respect to NAB, three prior requests have been made and granted with respect to ANZ and CBA and four prior requests have been made and granted with respect to Morgan Stanley. ECF Nos. 461, 466, 470, 472.

Plaintiffs continue to negotiate in good faith to finalize certain material terms of the final stipulations of settlement with ANZ, CBA, NAB and Morgan Stanley. Plaintiffs have not yet executed final stipulations of settlement with these four defendants. Plaintiffs previously executed proposed settlements with two additional defendants—Westpac Banking Corporation (“Westpac”) and JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. (collectively, “JPMorgan”). On July 16, 2021, the Court granted Plaintiffs’ request for an adjournment of the notice, fairness hearing and related deadlines in the Court’s conditional certification Orders concerning Plaintiffs’ proposed settlements with Westpac and JPMorgan. ECF No. 472. At the time Plaintiffs submit the consolidated conditional certification motion for their proposed settlements with ANZ, CBA, NAB and Morgan Stanley, Plaintiffs intend to (1) submit a single, combined notice concerning all six proposed settlements and (2) propose a date for a fairness hearing and schedule for providing notice for all six proposed settlements.

Respectfully submitted,

/s/ Christopher Lovell
Christopher Lovell
Lovell Stewart Halebian Jacobson LLP

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

cc: All Counsel of Record (by electronic mail)