

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RICHARD DENNIS, SONTERRA CAPITAL MASTER FUND, LTD., FRONTPOINT FINANCIAL SERVICES FUND, L.P., FRONTPOINT ASIAN EVENT DRIVEN FUND, L.P., FRONTPOINT FINANCIAL HORIZONS FUND, L.P., AND ORANGE COUNTY EMPLOYEES RETIREMENT SYSTEM, on behalf of themselves and all others similarly situated,

Docket No. 16-cv-06496 (LAK)

Plaintiffs,

-against-

JPMORGAN CHASE & CO., JPMORGAN CHASE BANK, N.A., BNP PARIBAS, S.A., THE ROYAL BANK OF SCOTLAND GROUP PLC, THE ROYAL BANK OF SCOTLAND PLC, RBS N.V., RBS GROUP (AUSTRALIA) PTY LIMITED, UBS AG, AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD., COMMONWEALTH BANK OF AUSTRALIA, NATIONAL AUSTRALIA BANK LIMITED, WESTPAC BANKING CORPORATION, DEUTSCHE BANK AG, HSBC HOLDINGS PLC, HSBC BANK AUSTRALIA LIMITED, LLOYDS BANKING GROUP PLC, LLOYDS BANK PLC, MACQUARIE GROUP LTD., MACQUARIE BANK LTD., ROYAL BANK OF CANADA, RBC CAPITAL MARKETS LLC, MORGAN STANLEY, MORGAN STANLEY AUSTRALIA LIMITED, CREDIT SUISSE GROUP AG, CREDIT SUISSE AG, ICAP PLC, ICAP AUSTRALIA PTY LTD., TULLETT PREBON PLC, TULLETT PREBON (AUSTRALIA) PTY LTD., AND JOHN DOES NOS. 1-50.

Defendants.

NOTICE OF MOTION FOR CONDITIONAL CLASS CERTIFICATION FOR PURPOSES OF CLASS ACTION SETTLEMENTS WITH DEFENDANTS CREDIT SUISSE AG AND CREDIT SUISSE GROUP AG, AND DEFENDANTS BNP PARIBAS, S.A., DEUTSCHE BANK AG, ROYAL BANK OF CANADA, THE ROYAL BANK OF SCOTLAND PLC, AND UBS AG AND FOR ORDERS APPROVING CLASS NOTICE PLAN AND SCHEDULING HEARING FOR FINAL APPROVAL

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the Joint Declaration of Vincent Briganti and Christopher McGrath, the exhibits attached thereto and the record herein, Plaintiffs, by and through their undersigned counsel, will move this Court before the Honorable Lewis A. Kaplan, Courtroom 21B, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007 on a date and time to be set by the Court, for an order, *inter alia*: (i) conditionally certifying the settlement class for purposes of Plaintiffs' proposed class action settlement with Defendants (1) Credit Suisse AG and Credit Suisse Group AG ("Credit Suisse") and (2) BNP Paribas, S.A. ("BNPP"), Deutsche Bank AG ("Deutsche Bank"), Royal Bank of Canada ("RBC"), The Royal Bank of Scotland plc (n/k/a NatWest Markets plc) ("RBS"), and UBS AG ("UBS"); (ii) approving Plaintiffs' proposed notice plan and forms of notice and (iii) setting the fairness hearing for November 1, 2022 at 4:00 p.m. and scheduling deadlines for settlement-related events leading up to the fairness hearing.

Dated: April 29, 2022
White Plains, New York

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