

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

FUND LIQUIDATION HOLDINGS LLC, as assignee and  
successor-in-interest to FrontPoint Asian Event Driven Fund  
L.P., MOON CAPITAL PARTNERS MASTER FUND  
LTD., and MOON CAPITAL MASTER FUND LTD., on  
behalf of themselves and all others similarly situated,

Plaintiffs,

v.

CITIBANK, N.A., BANK OF AMERICA, N.A.,  
JPMORGAN CHASE BANK, N.A., THE ROYAL BANK  
OF SCOTLAND PLC, UBS AG, BNP PARIBAS, S.A.,  
OVERSEA-CHINESE BANKING CORPORATION LTD.,  
BARCLAYS BANK PLC, DEUTSCHE BANK AG,  
CREDIT AGRICOLE CORPORATE AND INVESTMENT  
BANK, CREDIT SUISSE AG, STANDARD CHARTERED  
BANK, DBS BANK LTD., ING BANK, N.V., UNITED  
OVERSEAS BANK LIMITED, AUSTRALIA AND NEW  
ZEALAND BANKING GROUP, LTD., THE BANK OF  
TOKYO-MITSUBISHI UFJ, LTD., THE HONGKONG  
AND SHANGHAI BANKING CORPORATION LIMITED,  
COMMERZBANK AG, AND JOHN DOES NOS. 1-50,

Defendants.

Docket No. 16-cv-05263 (AKH)

**NOTICE OF REPRESENTATIVE PLAINTIFFS' MOTION  
FOR ENTRY OF AN ORDER APPROVING DISTRIBUTION OF THE NET  
SETTLEMENT FUNDS TO AUTHORIZED CLAIMANTS**

**PLEASE TAKE NOTICE** that upon the accompanying memorandum of law, the Declaration of Jack Ewashko in Support of Representative Plaintiffs' Motion for Entry of an Order Approving Distribution of the Net Settlement Funds to Authorized Claimants and the record herein, Representative Plaintiffs Fund Liquidation Holdings, LLC, individually and as assignee and successor-in-interest to FrontPoint Asian Event Driven Fund, L.P., Moon Capital Partners Master Fund Ltd., and Moon Capital Master Fund Ltd., by and through their undersigned counsel, will move this Court, before the Honorable Alvin K. Hellerstein, United States District Judge, at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York, on such a date and time as the Court may direct, for an order approving the administrative recommendations of the Court-approved Settlement Administrator, A.B. Data, Ltd. and the distribution of the Net Settlement Funds from the Settlements with (1) Citibank, N.A. and Citigroup Inc.; (2) JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A.; (3) Credit Suisse AG; (4) Deutsche Bank AG; (5) The Hongkong and Shanghai Banking Corporation Limited; (6) ING Bank N.V.; and (7) Australia and New Zealand Banking Group, Ltd., Bank of America, N.A., Barclays Bank PLC, BNP Paribas, S.A., Commerzbank AG, Crédit Agricole Corporate and Investment Bank, DBS Bank Ltd., MUFG Bank, Ltd. (f/k/a The Bank of Tokyo-Mitsubishi UFJ, Ltd.), Oversea-Chinese Banking Corporation Limited, The Royal Bank of Scotland plc (n/k/a NatWest Markets plc), Standard Chartered Bank, UBS AG, and United Overseas Bank Limited, and granting such other relief set forth in the proposed order filed herewith.

Dated: July 14, 2023  
White Plains, New York

**LOWEY DANNENBERG, P.C.**

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Proposed Class*