

**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)

**REPRESENTATIVE PLAINTIFFS' NOTICE OF MOTION
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENTS WITH CITIBANK,
N.A., CITIGROUP INC., JPMORGAN CHASE & CO., JPMORGAN CHASE BANK,
N.A., CREDIT SUISSE AG, DEUTSCHE BANK AG, THE HONGKONG AND
SHANGHAI BANKING CORPORATION LIMITED, ING BANK N.V., 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**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the Declaration of Vincent Briganti, the exhibits attached thereto, and the record herein, Representative Plaintiffs, by and through their undersigned counsel, will respectfully 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, Courtroom 14D, New York, New York on November 29, 2022 at 12:00 p.m. for orders granting final approval of the Settlements between Representative Plaintiffs and Defendants, including (1) Citibank, N.A. and Citigroup Inc., (2) JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A., (3) The Hongkong and Shanghai Banking Corporation Limited, (4) Credit Suisse AG, (5) Deutsche Bank AG, (6) ING Bank N.V., (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 for such other relief as set forth in the [Proposed] Final Approval Orders and the [Proposed] Final Judgments, to be filed with the Court.

Dated: October 10, 2022
White Plains, New York

LOWEY DANNENBERG, P.C.

By: /s/ Vincent Briganti
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the Proposed Class*