

**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 PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT WITH DEFENDANTS 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 memoranda of law, the Declaration of Vincent Briganti, and the exhibits attached thereto including the Settlement

Agreement, 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, New York, New York on June 9, 2022 at 12:00 P.M., for an order granting Representative Plaintiffs' motion for preliminary approval of the Settlement Agreement between Representative Plaintiffs and 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 the other relief set forth in the proposed orders annexed hereto.

Dated: May 27, 2022  
White Plains, New York

**LOWEY DANNENBERG, P.C.**

By: /s/ Vincent Briganti

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Proposed Class*

**TABLE OF CONTENTS TO MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT WITH DEFENDANTS 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**

- Notice of Motion
- Representative Plaintiffs’ Memorandum in Support of Motion for Preliminary Approval of Class Action Settlement with Defendants Australia and New Zealand Banking Group, Ltd. (“ANZ”), Bank of America, N.A. (“BOA”), Barclays Bank PLC (“Barclays”), BNP Paribas, S.A. (“BNPP”), Commerzbank AG (“Commerzbank”), Crédit Agricole Corporate and Investment Bank (“CACIB”), DBS Bank Ltd. (“DBS”), MUFG Bank, Ltd. (f/k/a The Bank of Tokyo-Mitsubishi UFJ, Ltd.) (“MUFG”), Oversea-Chinese Banking Corporation Limited (“OCBC”), The Royal Bank of Scotland plc (n/k/a NatWest Markets plc) (“RBS”), Standard Chartered Bank (“SCB”), UBS AG (“UBS”), and United Overseas Bank Limited (“UOB”)
- Representative Plaintiffs’ Supplemental Memorandum in Further Support of All Settlements
- Declaration of Vincent Briganti dated May 27, 2022
  - Exhibits to Declaration of Vincent Briganti:

<b>TABLE OF EXHIBITS</b>	
Exhibit 1	Stipulation and Agreement of Settlement with ANZ, BOA, Barclays, BNPP, Commerzbank, CACIB, DBS, MUFG, OCBC, RBS, SCB, UBS, and UOB dated May 27, 2022.
Exhibit 2	Amended Proposed Long Form notice.
Exhibit 3	Amended Proposed Short Form notice.
Exhibit 4	Amended Proof of Claim and Release form.

- [Proposed] Order Preliminarily Approving Class Action Settlement with 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

- [Amended Proposed] Order Preliminarily Approving Class Action Settlement with Citibank, N.A., Citigroup Inc., Scheduling a Hearing for Final Approval Thereof, and Approving the Proposed Form and Program of Notice to the Class
- [Amended Proposed] Order Preliminarily Approving Class Action Settlement with Credit Suisse AG, Scheduling a Hearing for Final Approval Thereof, and Approving the Proposed Form and Program of Notice to the Class
- [Amended Proposed] Order Preliminarily Approving Class Action Settlement with Deutsche Bank AG, Scheduling a Hearing for Final Approval Thereof, and Approving the Proposed Form and Program of Notice to the Class
- [Amended Proposed] Order Preliminarily Approving Class Action Settlement with The Hongkong and Shanghai Banking Corporation Limited, Scheduling a Hearing for Final Approval Thereof, and Approving the Proposed Form and Program of Notice to the Class
- [Amended Proposed] Order Preliminarily Approving Class Action Settlement with ING Bank N.V., Scheduling a Hearing for Final Approval Thereof, and Approving the Proposed Form and Program of Notice to the Class
- [Amended Proposed] Order Preliminarily Approving Class Action Settlement with JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A., Scheduling a Hearing for Final Approval Thereof, and Approving the Proposed Form and Program of Notice to the Class