

**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)

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

**PLEASE TAKE NOTICE** that, upon the accompanying memorandum of law, the Declaration of Vincent Briganti, and the exhibits attached thereto including the Settlement Agreements, and the record herein, 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 May 19, 2022 at 9:30 A.M., for an order granting Plaintiffs' motion for preliminary approval of the Settlement Agreements between (1) Plaintiffs and Citibank, N.A. and Citigroup Inc.; (2) Plaintiffs and Credit Suisse AG; (3) Plaintiffs and Deutsche Bank AG; (4) Plaintiffs and The Hongkong and Shanghai Banking Corporation Limited; (5) Plaintiffs and ING Bank N.V.; (6) Plaintiffs and JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A.; and the other relief set forth in the proposed orders annexed hereto.

Dated: May 13, 2022  
White Plains, New York

**LOWEY DANNENBERG, P.C.**

By: /s/ Vincent Briganti  
Vincent Briganti  
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*Counsel for Representative Plaintiffs and the  
Proposed Class*

**TABLE OF CONTENTS TO MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENTS WITH DEFENDANTS CITIBANK, N.A., CITIGROUP INC., CREDIT SUISSE AG, DEUTSCHE BANK AG, THE HONGKONG AND SHANGHAI BANKING CORPORATION LIMITED, ING BANK N.V., JPMORGAN CHASE & CO., AND JPMORGAN CHASE BANK, N.A.**

- Notice of Motion
- Plaintiffs' Memorandum in Support of Motion for Preliminary Approval of Class Action Settlements with Defendants Citibank, N.A., Citigroup Inc., Credit Suisse AG, Deutsche Bank AG, The Hongkong and Shanghai Banking Corporation Limited, ING Bank N.V., JPMorgan Chase & Co., and JPMorgan Chase Bank, N.A.
- Declaration of Vincent Briganti dated May 13, 2022
  - Exhibits to Declaration of Vincent Briganti:

<b>TABLE OF EXHIBITS</b>	
Exhibit 1	Stipulation and Agreement of Settlement with Citi dated May 22, 2018.
Exhibit 2	Stipulation and Agreement of Settlement with JPMorgan dated November 14, 2018.
Exhibit 3	Stipulation and Agreement of Settlement with HSBC dated May 3, 2022.
Exhibit 4	Stipulation and Agreement of Settlement with Credit Suisse dated April 22, 2022.
Exhibit 5	Stipulation and Agreement of Settlement with Deutsche Bank dated March 17, 2022.
Exhibit 6	Stipulation and Agreement of Settlement with ING dated March 17, 2022.
Exhibit 7	Declaration of Linda V. Young, dated May 13, 2022.
Exhibit 8	Proposed Long Form notice.
Exhibit 9	Proposed Short Form notice.
Exhibit 10	Proof of Claim and Release form.
Exhibit 11	Proposed Distribution Plan.
Exhibit 12	Lowey's firm resume.

- [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
- [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

- [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
- [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
- [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
- [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