

# **EXHIBIT 10**

This Form Must Be Submitted Online OR  
Postmarked and Mailed No Later Than  
[DATE].

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

FUND LIQUIDATION HOLDINGS LLC, as assignee  
and successor-in-interest to Front Point Asian Event  
Driven Fund L.P., *et al.*

Plaintiffs,

v.

CITIBANK, N.A., *et al.*

Defendants.

Case No.: 1:16-cv-5263 (AKH)

**PROOF OF CLAIM AND  
RELEASE**

**I. INSTRUCTIONS**

1. If you transacted in purchased, sold, held, traded, or otherwise had any interest in SIBOR- and/or SOR-Based Derivatives during the period from January 1, 2007 through December 31, 2011 (the “Class Period”), you may be eligible to receive a payment from the settlements reached between Representative Plaintiffs and Defendants Citibank, N.A. and Citigroup Inc. (“Citi”), JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. (“JPMorgan”), ING Bank N.V. (“ING”), Deutsche Bank AG (“Deutsche Bank”), The Hongkong and Shanghai Banking Corporation Limited (“HSBC”), and Credit Suisse AG (“Credit Suisse” collectively with Citi, JPMorgan, ING, Deutsche Bank, and HSBC, the “Settling Defendants”) totaling \$64,458,000 in the above-captioned case.

2. “SIBOR- and/or SOR-Based Derivatives” means (i) a SIBOR- and/or SOR-based interest rate swap entered into by a U.S. Person, or by a Person from or through a location within the U.S.; (ii) an option on a SIBOR- and/or a SOR-based interest rate swap (“swaption”) entered into by a U.S. Person, or by a Person from or through a location within the U.S.; (iii) a Singapore Dollar currency forward agreement entered into by a U.S. Person, or by a Person from or through a location within the U.S.; (iv) a SIBOR- and/or SOR-based forward rate agreement entered into by a U.S. Person, or by a Person from or through a location within the U.S.; and/or (v) a SIBOR- and/or SOR-based foreign exchange swap entered into by a U.S. Person, or by a Person from or through a location within the U.S.

3. “SIBOR” means the Singapore Interbank Offered Rate. This term includes USD SIBOR and SGD SIBOR.

4. “SOR” means the Singapore Swap Offer Rate (“SOR”).

5. Unless otherwise defined herein, all capitalized terms contained in this proof of claim and release (“Claim Form”) have the same meaning as in the accompanying **Notice of Proposed Class Action Settlements, [Date], 2022 Fairness Hearing Thereon and Class Members’ Rights** (“Notice”) and the Settlement Agreements between Representative Plaintiffs and the respective Settling Defendants, which are available at [www.siborsettlement.com](http://www.siborsettlement.com) (the “Settlement Website”).

6. It is important that you read the Notice that accompanies this Claim Form. By signing and submitting this Claim Form, you will be certifying that you have read the Notice, including the terms of the Release and Covenant Not to Sue described in the Notice under the heading “What Am I Giving Up to Receive a Payment?” and provided for in the Settlement Agreement.

7. To be eligible to receive a payment from the Net Settlement Fund, you must submit a timely and valid Claim Form along with the required data and/or information described in Parts II through IV below. **To be considered**

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**timely, your Claim Form must be submitted online at [www.siborsettlement.com](http://www.siborsettlement.com) by 11:59 p.m. Eastern Time on [date] OR postmarked and mailed by the Settlement Administrator no later than [date] to:**

**SIBOR/SOR Class Action Settlement**

c/o \_\_\_\_\_

[Address]

[City, State ZIP]

Do not submit your claim to the Court.

If you are unable to submit the required data as described below at Parts II through IV, you should call the Settlement Administrator for further instructions.

8. As described in Part III below, you are required to submit additional information about your transactions in SIBOR- and/or SOR-Based Derivatives as part of your Claim Form to be submitted to the Settlement Administrator.

9. Your payment amount will be determined based on the Settlement Administrator's review of your Claim Form and calculated pursuant to the Distribution Plan that the Court approves. Submission of a Claim Form does not guarantee that you will receive a payment from the Settlement. For more information, please refer to the Notice and Distribution Plan available at the Settlement Website.

10. Separate Claim Forms should be submitted for each separate legal entity. Conversely, a single Claim Form should be submitted on behalf of only one legal entity.

11. If you have questions about submitting a Claim Form or need additional copies of the Claim Form or the Notice, you may contact the Settlement Administrator.

12. **NOTICE REGARDING ELECTRONIC FILES:** Certain claimants with large numbers of transactions may request to, or may be requested to by the Claims Administrator, submit information regarding their transactions in electronic files. All such claimants **MUST** also submit a manually signed paper Proof of Claim listing all of their transactions whether or not they also submit electronic copies. If you wish to submit your claim electronically, you must contact the Claims Administrator at [EMAIL] or visit [www.SIBORSETTLEMENT.com](http://www.SIBORSETTLEMENT.com) to obtain the required file layout. No electronic files will be considered to have been properly submitted unless the Claims Administrator issues to the claimant an email of receipt and acceptance of electronically submitted data. **Do not assume that your file has been received until you receive this email. If you do not receive such an email within 10 days of your submission, you should contact the Claims Administrator's electronic filing department at [EMAIL] to inquire about your file and confirm it was received.**

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**II. CLAIMANT IDENTIFICATION**

The Settlement Administrator will use this information for all communications relevant to this Claim Form. If this information changes, please notify the Settlement Administrator in writing. If you are a trustee, executor, administrator, custodian, or other nominee and are completing and signing this Claim Form on behalf of the Claimant, you must attach documentation showing your authority to act on behalf of Claimant.

**Section A – Claimant Information**

Claimant's First Name	MI	Claimant's Last Name
<input type="text"/>	<input type="text"/>	<input type="text"/>

Co-Claimant's First Name	MI	Co-Claimant's Last Name
<input type="text"/>	<input type="text"/>	<input type="text"/>

Entity Name (if Claimant is not an individual)

Representative or Custodian Name (if different from Claimant[s] listed above)

Address 1 (street name and number)

Address 2 (apartment, unit, or box number)

City	State	ZIP Code/Postal Code
<input type="text"/>	<input type="text"/>	<input type="text"/>

Province/Region (if outside U.S.)

Country

Claimant Tax ID (For most U.S. Claimants, this is their individual Social Security number, employer identification number, or taxpayer identification number. For non-U.S. Claimants, enter a comparable government-issued identification number.)

Telephone Number (home or cell)

 -  - 

Telephone Number (work)

 -  - 

Email Address (If you provide an email address, you authorize the Claims Administrator to use it in providing you with information relevant to this claim.)

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**Section B – Authorized Representative Information**

Name of the person you would like the Settlement Administrator to contact regarding this claim (if different from the Claimant name listed above)

First Name

MI

Last Name

Telephone Number (home or cell)

Telephone Number (work)

Address 1 (street name and number)

Address 2 (apartment, unit, or box number)

City

State

ZIP Code/Postal Code

Province/Region (if outside U.S.)

Email Address (If you provide an email address, you authorize the Claims Administrator to use it in providing you with information relevant to this claim.)

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### III. REQUIREMENTS FOR CLAIM SUBMISSION

#### 1. YOU MUST SUBMIT YOUR CLAIM FORM ELECTRONICALLY OR ON PAPER IN THE REQUIRED FORMAT

Claimants must electronically submit their Claim Forms online at [www.siborsettlement.com](http://www.siborsettlement.com) by **11:59 p.m. Eastern Time on [date]** OR mail the Claim Forms to the Settlement Administrator at [address] so they **are postmarked and mailed no later than [date]**. Claim Forms must be submitted in the format specified in this Claim Form or posted by the Settlement Administrator on the Settlement Website.

Along with your Claim Form, you are required to submit the details of your transactions in SIBOR- and/or SOR-Based Derivatives reflected in Part IV, below. A Data Template, including the information you must provide about your transactions in SIBOR- and/or SOR-Based Derivatives is below and also available at the Settlement Website. In addition, please provide any of the following types of supporting documentation that verifies the transaction information you provide:

- a. Transaction data from your bank, broker, or internal trade system;
- b. Bank confirmations by individual trade;
- c. Bank transaction reports or statements;
- d. Trading venue transaction reports or statements;
- e. Prime broker reports or statements;
- f. Custodian reports or statements;
- g. Daily or monthly account statements or position reports;
- h. Email confirmations from counterparty evidencing transactions;
- i. Bloomberg confirmations or communications evidencing transactions; and/or
- j. Other documents evidencing transactions SIBOR- and/or SOR-Based Derivatives during the Class Period.

Please keep all data and documentation related to your eligible SIBOR- and/or SOR-Based Derivatives transactions. Having data and documentation may be important to substantiating your Claim Form.

**ACCURATE CLAIMS PROCESSING TAKES A SIGNIFICANT AMOUNT OF TIME.  
THANK YOU IN ADVANCE FOR YOUR PATIENCE.**

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**IV. TABLE OF TRANSACTIONS IN SIBOR- AND/OR SOR-BASED DERIVATIVES**

Complete this Part IV if and only if you entered into transactions in SIBOR- and/or SOR-Based Derivatives from January 1, 2007 through December 31, 2011. Do not include information regarding instruments other than SIBOR- and/or SOR-Based Derivatives and do not include transactions in SIBOR- and/or SOR-Based Derivatives in which you acquired the instrument as an agent for another individual or entity.

**List of Brokers or Nominees**

Please list all brokers or nominees at which you maintained accounts in which you traded or held in SIBOR- and/or SOR-Based Derivatives.


**List of Account Names and Account Numbers**

Please provide a list of all account names and account numbers for each entity you listed in response above in which you traded or held SIBOR- and/or SOR-Based Derivatives.


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**TABLE I-A – PURCHASE(S) AND SALE(S) OF SWAPTIONS, FRAS, AND SWAPS, WITH A CONSTANT NOTIONAL VALUE DURING THE CLASS PERIOD**

For each purchase or sale of a swaption, FRA, swap with a notional value that remained constant during the contract period, provide the following information for each transaction.

Transaction Type (e.g., swap, swaption, FRA)	Trade Date (mm/dd/yyyy)	Applicable Rate and Duration (Tenor)	Notional Value (in SGD) for Interest Payment	Frequency of Reset Dates	Exit Date (if applicable)	Location of Transaction	Counterparty Name	Broker Name (if applicable)



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**TABLE I-B – PURCHASE(S) AND SALE(S) OF SWAPS WITH A VARIABLE NOTIONAL VALUE DURING THE CLASS PERIOD**

For each purchase or sale of a swap whose notional value fluctuated during the contract period, provide the following information for each interest payment for each transaction. **If necessary, please add additional columns to reflect all interest payments associated with the transaction. For example, if there were ten interest payments for a particular transaction, list the dates of all ten interest payments, the notional value (in SGD) on which each interest payment was calculated, and the amount of each interest payment:**

Swap Transaction Type	Swap Trade Date (mm/dd/yyyy)	Date of Interest Payment (mm/dd/yyyy)	Amount of Interest Payment (in SGD)	Notional Value (in SGD) for Interest Payment	Reference Interest Rate and Tenor	Location of Transaction	Counterparty Name	Broker Name (if applicable)

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**TABLE II – PURCHASE(S) AND SALE(S) OF FX FORWARDS AND FX SWAPS DURING THE CLASS PERIOD**

For a purchase or sale of a foreign exchange (“FX”) forward or FX swap, provide the following information for each transaction:

<b>Transaction Type (e.g., FX forward, FX swap)</b>	<b>Trade Date</b>	<b>Notional Value (in SGD)</b>	<b>Date Position Opened (mm/dd/yyyy)</b>	<b>Date Position Closed (mm/dd/yyyy)</b>	<b>Notional Amount of Corresponding Currency</b>	<b>Day-Count Convention</b>	<b>Location of Transaction</b>	<b>Counterparty Name</b>	<b>Broker Name (if applicable)</b>

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If you have any additional SIBOR- and/or SOR-Based Derivatives transactions that you believe do not fit in any of the above categories, please list below and supply supporting documentation:

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It is important that you accurately disclose all transactions in SIBOR- and/or SOR-Based Derivatives during the Class Period. Plaintiffs' Counsel and the Settlement Administrator reserve the right to seek further information from you regarding your Proof of Claim and Release.

**V. CLAIMANT'S CERTIFICATION & SIGNATURE**

**SECTION A: CERTIFICATION**

**BY SIGNING AND SUBMITTING THIS CLAIM FORM, CLAIMANT OR CLAIMANT'S AUTHORIZED REPRESENTATIVE CERTIFIES ON CLAIMANT'S BEHALF AS FOLLOWS:**

1. I (we) have read the Notice and Claim Form, including the descriptions of the Release and Covenant Not to Sue provided for in the Settlement Agreements;
2. I (we) am (are) a Class Member and am (are) not one of the individuals or entities excluded from the Settlement Class;
3. I (we) have not submitted a Request for Exclusion;
4. I (we) have made the transactions submitted with this Claim Form for myself (ourselves) and not as agents of another, and have not assigned my (our) Released Claims to another;
5. I (we) hereby warrant and represent that I (we) have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any matter released pursuant to the release or any other part or portion thereof;
6. I (we) have not submitted any other claim in this Action covering the same transactions and know of no other person having done so on his/her/its/their behalf;
7. I (we) hereby consent to the disclosure of, waive any protections provided by any applicable bank secrecy or data privacy laws (whether foreign or domestic), or any similar confidentiality protections with respect to, and instruct Settling Defendants or any authorized third party to disclose my (our) information and transaction data relating to my (our) trades for use in the claims administration process;
8. I (we) submit to the jurisdiction of the Court with respect to my (our) claim and for purposes of enforcing the releases set forth in any Final Judgment that may be entered in the Action;
9. I (we) agree to furnish such additional information with respect to this Claim Form as the Settlement Administrator or the Court may require; and
10. I (we) acknowledge that I (we) will be bound by and subject to the terms of the Judgment that will be entered in the Action if the Settlement is approved.
11. I (we) certify that I am (we are) not subject to backup withholding under the provisions of Section 3406(a)(1)(C) of the Internal Revenue Code.

**SECTION B: SIGNATURE**

**PLEASE READ THE RELEASE, CONSENT TO DISCLOSURE AND CERTIFICATION, AND SIGN BELOW.**

I (we) acknowledge that, as of the Effective Date of the Settlement, pursuant to the terms set forth in the Settlement Agreement, and by operation of law and the Final Judgment, I (we) shall be deemed to release and forever discharge and shall be forever enjoined from prosecuting the Released Claims against the Released Parties (as defined in the Settlement Agreement and/or Final Judgment).

By signing and submitting this Claim Form, I (we) consent to the disclosure of information relating to my (our) transactions in SIBOR- and/or SOR-Based Derivatives during the Class Period, and waive any protections provided by any applicable bank secrecy or data privacy laws (whether foreign or domestic), or any similar confidentiality protections with respect to information and transaction data relating to my (our) trades, for use in the claims administration process.

If signing as an Authorized Representative on behalf of an entity, I (we) certify that I (we) have legal rights and authorization from the entity to file this Claim Form on the entity's behalf.

**UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA, I (WE) CERTIFY THAT ALL THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE AND THAT THE DATA SUBMITTED IN CONNECTION WITH THIS CLAIM FORM ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.**

\_\_\_\_\_  
Signature of Claimant (if Claimant is an individual filing on his or her own behalf)

Date: \_\_\_\_\_  
MM/DD/YY

\_\_\_\_\_  
Print Name of Claimant (if Claimant is an individual filing on his or her own behalf)

\_\_\_\_\_  
Authorized Representative Completing Claim Form (if any)

Date: \_\_\_\_\_  
MM/DD/YY

\_\_\_\_\_  
Print name of Authorized Representative Completing Claim Form (if any)

\_\_\_\_\_  
Capacity of Authorized Representative (if other than an individual (e.g., trustee, executor, administrator, custodian, or other nominee))

**REMINDER: YOUR CLAIM FORM AND REQUIRED DATA MUST BE SUBMITTED ONLINE BY 11:59 P.M. EASTERN TIME ON [DATE] OR POSTMARKED AND MAILED NO LATER THAN [DATE] TO:**

**SIBOR/SOR Class Action Settlement**

c/o \_\_\_\_\_  
[Address]  
[City, State ZIP]