

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

IN RE FOREIGN EXCHANGE BENCHMARK
RATES ANTITRUST LITIGATION

Case No. 1:13-cv-07789-LGS

**SUPPLEMENTAL DECLARATION OF
ANGELA FERRANTE REGARDING (A) MAILING OF THE
NOTICE AND PROOF OF CLAIM FORM; AND (B) REPORT ON
OBJECTIONS AND REQUESTS FOR EXCLUSION RECEIVED TO DATE**

I, ANGELA FERRANTE, hereby declare and state as follows:

1. I am a Senior Vice President, Operations of Garden City Group, LLC (“GCG”). I submit this Declaration to supplement my January 8, 2018 Declaration Regarding (A) Mailing of the Notice and Proof of Claim Form; (B) Publication of the Summary Notice; (C) Website, Telephone Helpline and Email; (D) Coordination with Rust and Defendants; and (E) Report on Objections and Requests for Exclusion Received to Date previously filed with the Court (the “Mailing Declaration”)¹ The following statements are based upon my personal knowledge as well as information provided to me by other experienced GCG employees working under my supervision, and if called on to do so, I could and would testify competently thereto.

MAILING OF THE NOTICE AND PROOF OF CLAIM FORM

2. Since the execution of the Mailing Declaration, GCG has continued to disseminate copies of the Claim Packet in response to additional requests from potential Settlement Class Members of the Settlement Class, brokers, and nominees.

¹ All capitalized terms not otherwise defined in this document shall have the meaning ascribed to them in the Settlement Agreements and the Mailing Declaration.

Since January 7, 2018, GCG has received additional names and addresses of potential Settlement Class Members. GCG promptly sent, and continues to promptly send, a Claim Packet to each such name and address. In addition, during this same time period, GCG received 425 bulk requests from 16 brokers and FCMs, so that they can mail them directly to potential Settlement Class Members. GCG promptly provided the requested Claim Packets.

3. As detailed in the Mailing Declaration, GCG maintains a Nominee Database and prior to mailing Claim Packets, in August 2017, GCG mailed Broker Letters to 1,642 FCMs and brokers in an effort to provide them advance notice and direction on notifying their customers. GCG also worked with Class Counsel to mail a reminder letter to the FCMs in September 2017. At that time, GCG mailed a reminder letter to the same 1,642 brokers and FCMs. Copies of the letters mailed to the brokers and FCMs were attached to the Mailing Declaration as Exhibits B and C.

4. In the aggregate, as of April 22, 2018, GCG has mailed 434,115 Claim Packets by first-class mail, postage prepaid. This includes 1,909 Claim Packets that were remailed to updated addresses provided by the U.S. Postal Service, 68 Claim Packets that were mailed to fulfill Settlement Class Member requests, and 9,300 Claim Packets that were remailed at the direction of Class Counsel with updated Settlement Class Member information. In total, 49,321 of Claim Packets were returned undeliverable.

NEWSPAPER, WEBSITE, TELEPHONE HELPLINE, AND E-MAIL

5. In October, 2017 GCG caused notice to be published in eight national and international newspapers, and transmitted a press release over PR Newswire's Premier Global Service. GCG continues to maintain the dedicated website for this Action (www.fxantitrustsettlement.com) in order to assist potential Settlement Class Members. The

Settlement Website is accessible 24 hours a day, seven days a week. GCG will continue operating, maintaining, and, as appropriate, updating the website until the conclusion of the administration.

6. GCG continues to maintain the toll-free telephone number (1-888-582-2289) to accommodate potential Settlement Class Members in the U.S., U.S. territories, and Canada, who have questions about the Settlements and the telephone number (1-330-333-7253) for potential Settlement Class Members outside the U.S. and Canada. To date, GCG has received 5,972 calls related to the Settlements and has answered inquiries related to eligibility for the Settlements, its benefits, and the Mail Notice and Claim Form and has received 44,506 minutes worth of call time to the IVR.

7. GCG continues to monitor and respond to emails received at the email address, info@fxantitrustsettlement.com where Settlement Class Members may obtain additional information and updates about the Settlements.

8. As of April 22, 2018, the Settlement Website has had 47,320 unique visitors who have downloaded the Notice 26,465 times.

9. GCG has notified Class Members of the extension in the deadline to submit proof of Claim Forms via the Settlement Website and in direct communications with Class Members.

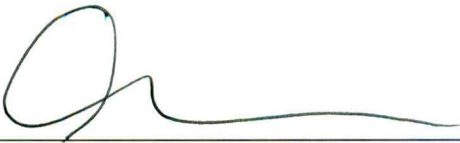
**REPORT ON OBJECTIONS AND
REQUESTS FOR EXCLUSION RECEIVED TO DATE**

10. The Notice informed Settlement Class Members that requests for exclusion from the Settlement Class were to be mailed or otherwise delivered, addressed to In re Foreign Exchange Benchmark Rates Antitrust Litigation, c/o GCG, P.O. Box 10239, Dublin, OH 43017-5739, such that they were postmarked no later than February 7, 2018. GCG has been monitoring all mail delivered to that Post Office Box. As reported in the Mailing Declaration, as of January

10, 2018, GCG had received six (6) requests for exclusion and no objections. To date, GCG has received an additional 45 requests for exclusion and 2 objections. The requests for exclusion now total 51. Of these 51 exclusions received by GCG, there were eight (8) where the party requesting exclusion purported not to be a member of the Class. Three (3) of the 51 requests for exclusion were not sent within the time specified in the Notice, and in consultation with Class Counsel, are therefore considered invalid. One request for exclusion was made by an employee of a Defendant who falls into the exclusion from the Class definitions.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed in Lake Success, New York on April 23, 2018.



Angela Ferrante