

**Class Action Summary**

**Euroyen-Based Derivatives Antitrust Class Action Settlements**

*This is not an official Court Notice. Information contained in this Summary is subject to change.*

If you or your business transacted in Euroyen-Based Derivatives from **January 1, 2006 through June 30, 2011**, an antitrust class action lawsuit alleging price fixing may affect you.

**Eligible Class Members:** All persons or entities (excluding the U.S. Government) who purchased, sold, held, traded, or otherwise had any interest in any "Euroyen-Based Derivatives" (defined below) during the period from January 1, 2006 through June 30, 2011.

**Definition of "Euroyen-Based Derivatives":** Euroyen-Based Derivatives means the following: (i) a Euroyen TIBOR futures contract on the Chicago Mercantile Exchange ("CME"); (ii) a Euroyen TIBOR futures contract on the Tokyo Financial Exchange, Inc. ("TFX"), Singapore Exchange ("SGX"), or London International Financial Futures and Options Exchange ("LIFFE") entered into by a U.S. Person, or by a Person from or through a location within the U.S.; (iii) a Japanese Yen currency futures contract on the CME; (iv) a Yen LIBOR- and/or Euroyen TIBOR-based interest rate swap entered into by a U.S. Person, or by a Person from or through a location within the U.S.; (v) an option on a Yen LIBOR- and/or Euroyen TIBOR-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.; (vi) a Japanese Yen currency forward agreement entered into by a U.S. Person, or by a Person from or through a location within the U.S.; and/or (vii) a Yen LIBOR- and/or Euroyen TIBOR-based forward rate agreement entered into by a U.S. Person, or by a Person from or through a location within the U.S.

**"Defendants":** The **"Settling Defendants"** include: 1) Citibank, N.A., Citigroup Inc., Citibank Japan Ltd., and Citigroup Global Markets Japan Inc. (collectively, **"Citi"**); 2) R.P. Martin Holdings Limited and Martin Brokers (UK) Ltd. (collectively, **"R.P. Martin"**); 3) HSBC Holdings plc and HSBC Bank plc (collectively, **"HSBC"**); 4) Deutsche Bank AG and DB Group Services (UK) Ltd. (collectively, **"Deutsche Bank"**); 5) JPMorgan Chase & Co., JPMorgan Chase Bank, National Association, and J.P. Morgan Securities plc (collectively, **"JPMorgan"**); 6) The Bank of Tokyo-Mitsubishi UFJ, Ltd. (**"BTMU"**); 7) Mitsubishi UFJ Trust and Banking Corporation (**"MUTB"**); 8) The Bank of Yokohama, Ltd. (**"Yokohama"**); 9) Shinkin Central Bank (**"Shinkin"**); 10) The Shoko Chukin Bank, Ltd. (**"Shoko"**); 11) Sumitomo Mitsui Trust Bank, Ltd. and its predecessors (**"Sumitomo"**); 12) Resona Bank, Ltd. (**"Resona"**); 13) Mizuho Bank, Ltd., Mizuho Corporate Bank, Ltd. and Mizuho Trust & Banking Co., Ltd. (collectively, **"Mizuho"**); 14) The Norinchukin Bank (**"Norinchukin"**); and 15) Sumitomo Mitsui Banking Corporation (**"Sumitomo Mitsui"**). The **"Non-Settling Defendants"** include: UBS AG; UBS Securities Japan Co. Ltd.; Société Générale SA; The Royal Bank of Scotland Group plc; The Royal Bank of Scotland plc; RBS Securities Japan Limited; RBS Securities Inc.; Barclays Bank plc; Barclays plc; Barclays Capital Inc.; Cooperatieve Centrale Raiffeisen-Boerenleenbank B.A.; Lloyds Banking Group plc; Lloyds Bank plc; ICAP plc; ICAP Europe Limited; Tullett Prebon plc; Bank of America Corporation; Bank of America, N.A.; Merrill Lynch International; and John Doe Nos. 1-50.

**Case History:** Commencing in 2012, lawsuits were filed in the Southern District of New York alleging that the Defendants manipulated, and/or aided and abetted in the manipulation of, Euroyen-Based Derivatives in violation of federal antitrust laws. Since then, the class has reached settlements with several of the Defendants in the aggregate amount of \$307 million (the details of which are noted below). The litigation is currently ongoing against the Non-Settling Defendants and it is possible that additional funds may become available to the Class as the result of a trial or future settlements.

**First, Second, Third and Fourth Round of Settlements:** The first round of settlements totaled approximately \$58 million with Citi (\$23 million), R.P. Martin (settled in exchange for cooperation) and HSBC (\$35 million). These settlements received final Court approval and the claim filing deadline for this first round of settlements was January 24, 2017. The second round of settlements with Deutsche Bank (\$77 million) and JPMorgan (\$71 million) total approximately \$148 million. These settlements received final Court approval and the claim filing deadline for this second round of settlements was February 20, 2018. The third round of settlements with BTMU and MUTB total approximately \$30 million and has received final Court approval. The claim filing deadline for this third round of settlements was September 25, 2018. The fourth round of settlements with Resona (\$1.75 million), Yokohama (\$7.5 million), Shinkin (\$7.5 million), Shoko (\$7.5 million), Sumitomo (\$7.5 million) and Mizuho, Norinchukin and Sumitomo Mitsui (\$39.25 million) total approximately \$71 million and received final Court approval. The claim filing deadline for this fourth round of settlements was March 3, 2020. Distribution of the First, Second, Third and Fourth Round of Settlement funds will occur at a future date.

**Class Counsel or the Settlement Administrator may be contacted for additional settlement information.**

**You also may visit the Court-approved website.**

**Please understand that you have the right to file on your own.**

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**The Services FRS Provides:** Financial Recovery Strategies (FRS) is a class action claims management consultant; we are not a court appointed claims administrator or class counsel. If you hire FRS, FRS will work within your guidelines to manage the claims process. The services that FRS provides include the following: (i) notifying you when we believe that you may be eligible to participate in settlements likely to be valuable to you; (ii) endeavoring to enhance the likelihood that all of your eligible business units (e.g., subsidiaries, divisions, acquisitions and divestitures) are included in the claims process; (iii) to reduce the support needed from your in-house staff, providing advice on what, if any, documents need to be collected and maintained, and, when requested, assisting in that effort; (iv) when required documents are not available or are too burdensome to collect, attempting to develop innovative alternatives to satisfy documentation requirements and striving to obtain approval of those alternatives; (v) preparing, assembling and submitting your claim package, and managing it throughout the claims processing phase, including working with you to address any concerns or questions claims administrators may have; (vi) providing regular updates on the recovery process; (vii) reviewing your payment to assure that it has not been under calculated; and (viii) following up with you to assure that your recovery check is deposited. FRS's recovery specialists are always available to answer any questions you may have.

**How to Retain FRS:** If you wish to hire FRS to file and manage a claim on your behalf, you must return a signed Claims Management Agreement and a signed Authority to File and Manage Claims. Before doing so, it is important that you understand their terms and make sure that all information about you is correct.