

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

IN RE LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION)	MDL No. 2262 Master File No. 1:11-md-02262-NRB ECF Case
THIS DOCUMENT RELATES TO: Case No. 12-CV-1025 (NRB))	

**BONDHOLDER PLAINTIFFS’ NOTICE OF MOTION FOR FINAL
APPROVAL OF THE SETTLEMENTS WITH MUFG BANK, LTD.,
CREDIT SUISSE GROUP AG, AND THE NORINCHUKIN BANK,
AND FINAL APPROVAL OF THE PLAN OF ALLOCATION**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

PLEASE TAKE NOTICE that, at 11:00 a.m. on March 28, 2023, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007, in the Courtroom of the Honorable Naomi Reice Buchwald or by such other means as the Court may designate, Plaintiffs Ellen Gelboim and Linda Zacher (“Bondholder Plaintiffs”) will, and hereby do, move the Court, pursuant to Federal Rule of Civil Procedure 23(e), for an Order: (i) granting final approval of the proposed settlements (“Settlements”) reached between Bondholder Plaintiffs and defendants MUFG Bank, Ltd. (f/k/a Bank of Tokyo-Mitsubishi UFJ LTD. (“MUFG”)), Credit Suisse Group AG (“Credit Suisse”) and The Norinchukin Bank (“Norinchukin”) in the above-captioned action; (ii) confirming the certification of the MUFG, Credit Suisse and Norinchukin Settlement Classes; (iii) confirming the appointment of Morris and Morris LLC Counselors At Law and Weinstein Kitchenoff & Asher LLC as Settlement Class Counsel for the MUFG, Credit Suisse, and

Norinchukin Settlement Classes; (iv) confirming the appointment of Epiq Class Action & Claims Solutions, Inc. as Claims Administrator and The Huntington National Bank as Escrow Agent; (v) confirming the implementation of the Notice Program to members of the Bondholder Settlement Classes in accordance with the requirements of the Preliminary Approval Order; (vi) granting final approval the a Plan of Allocation; and (vii) entering the proposed Final Judgment and Order.

Submitted herewith in support of Bondholder Plaintiffs' motion are: (i) a memorandum in support of the motion; (ii) the joint declaration of Karen L. Morris and Robert S. Kitchenoff in support of the motion with exhibits; (iii) the declaration of Cameron R. Azari of Epiq in support of the motion, with exhibits; (iv) Bondholder Plaintiffs' proposed form of order granting the relief sought in this motion.

February 15, 2023

/s/ Karen L. Morris

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