

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

SONTERRA CAPITAL MASTER FUND, LTD.,
RICHARD DENNIS, and FRONTPOINT EUROPEAN
FUND, L.P., on behalf of themselves and all others similarly
situated,

Plaintiffs,

-against-

BARCLAYS BANK PLC, COOPERATIEVE CENTRALE
RAIFFEISEN-BOERENLEENBANK B.A., DEUTSCHE
BANK AG, LLOYDS BANKING GROUP PLC, THE
ROYAL BANK OF SCOTLAND PLC, UBS AG, JOHN DOE
NOS. 1-50, and BARCLAYS CAPITAL, INC.,

Defendants.

Docket No. 15-cv-3538 (VSB)

**DECLARATION OF AJMAL CHOUDRY REGARDING MAILING OF THE
NOTICE OF PROPOSED CLASS ACTION SETTLEMENT, NOVEMBER 16, 2023
FAIRNESS HEARING THEREON, AND SETTLEMENT CLASS MEMBERS' RIGHTS**

I, Ajmal Choudry, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a Project Manager at Epiq Class Action & Claims Solutions, Inc. (“Epiq”). My business address is 110 Bishopsgate, London, EC2N 4AY. I am over 21 years of age and am not a party to the above-captioned action (the “Action”). I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. In connection with the proposed settlement by Deutsche Bank AG (“Deutsche Bank”), Epiq was retained by counsel for Deutsche Bank to act as a notice administrator in connection with the proposed settlement in the Action to effect mailing of the Notice of Proposed Class Action Settlement, November 16, 2023 Fairness Hearing Thereon, and Class Members’ Rights, and Proof of Claim and Release (together, the “Notice Packet”) to certain members of the Settlement Class, including potential Settlement Class Members who may be domiciled outside of the United States.¹

MAILING OF THE NOTICE PACKET

3. On August 17, 2023, Deutsche Bank’s counsel provided Epiq with a list of 2,814 names and mailing addresses of entities identified as potential Settlement Class Members. Epiq applied its normal data standardization protocols and removed duplicate records, resulting in 580 unique records.

¹ All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the June 1, 2023 Opinion & Order, and the June 15, 2023 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 (collectively, the “Orders”).

4. On or before September 18, 2023, Epiq mailed copies of the Notice Packet by first-class mail to each of the 580 potential Settlement Class members. A sample of the Notice Packet is attached hereto as Exhibit A.

5. As a result of the efforts described above, as of September 18, 2023, Epiq has mailed a total of 580 Notice Packets.

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

Executed this 21st day of September, 2023 in London, United Kingdom.



Ajmal Choudry