UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE EUROPEAN GOVERNMENT BONDS ANTITRUST LITIGATION	Lead Case No. 19-cv-2601 Hon. Victor Marrero

DECLARATION OF JACK EWASHKO IN SUPPORT OF PLAINTIFFS' MOTION FOR AUTHORIZATION TO DISTRIBUTE THE NET SETTLEMENT FUND

Pursuant to 28 U.S.C. §1746, I, Jack Ewashko, declare:

1. I am the Client Services Director of A.B. Data, Ltd.'s Class Action Administration Company ("A.B. Data"), which has its corporate office in Milwaukee, Wisconsin. I am over 21 years of age and am not a party to these actions. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently thereto.

2. Pursuant to the Court's Orders (ECF Nos. 315, 381, 382, 505), A.B. Data was authorized to act as the Claims Administrator in connection with the proposed Settlements in the above-captioned action (the "Action").

3. Following the dissemination of the Class Notices and Fairness Hearings on the Settlements, the Court entered an Order finally approving the Settlements and Distribution Plan on December 9, 2024 (ECF Nos. 483, 484, 485, 486, 529, 530).

4. In accordance with the Settlements and the Amended Distribution Plan (ECF No. 503-6) ("Distribution Plan"), A.B. Data has now completed processing all Claims received. A.B. Data submits its administrative determinations accepting and rejecting the Claims and proposed procedures for distributing the Net Settlement Fund.[1]

[1] As of October 19, 2026, the Net Settlement Fund totals $87,301,334.75. This amount will increase as the funds continue to earn interest in the Escrow Account.

5. This Declaration describes A.B. Data's administration efforts including the work undertaken to: (i) process the Claims received; (ii) determine Claim eligibility and identify Claim- and transaction-level deficiencies in the Claims; (iii) notify Claimants of any deficiencies and final dispositions; (iv) audit certain Claims; (v) perform a quality assurance review; and (vi) process late Claims. This Declaration also proposes a procedure to distribute the Net Settlement Fund.

I. A.B. DATA'S PROCESSING OF CLAIMS RECEIVED

6. Each Class Member who wished to receive a distribution from the Net Settlement Fund was required to submit a Claim to A.B. Data by no later than November 27, 2024. Class Members seeking to share in the Net Settlement Fund were directed to mail their completed Claim to a dedicated P.O. Box, file online through the settlement website, https://www.europeangovernmentbondssettlement.com ("Settlement Website"), or to coordinate with A.B. Data to facilitate electronic claims filing. Through October 12, 2026, A.B. Data received 32,929 Claims.

7. In preparation for receiving and processing Claims, A.B. Data: (i) conferred with Class Counsel to define the project guidelines for processing Claims; (ii) created a unique database to store Claim details, images of Claims, and supporting documentation; (iii) trained staff in the specifics of the project; (iv) formulated a system to properly respond to telephone and e-mail inquiries; (v) developed various computer programs and screens for entry of Class Members' transactional and identifying information; and (vi) developed a proprietary calculation module that calculates each Authorized Claimant's *pro rata* share of the Net Settlement Fund (the "Distribution Amount") pursuant to the Distribution Plan.

A. Processing of Paper and Online Claims Received

8. Of the 32,929 Claims A.B. Data received, 50 paper Claims were mailed. Upon receipt, these paper Claims were scanned into a database together with all submitted documentation. Each paper Claim was then assigned a unique Claim number.

9. Once scanned, the information from each Claim form (including the Claimant's name, address, and account number/information from the supporting documentation) and the Claimant's transactions were entered into a secured database developed by A.B. Data to process Claims submitted for the Settlement (the "priority database").

10. A.B. Data also received 253 online claims submitted through the Settlement Website, which were loaded into the priority database as they were received.

11. A.B. Data reviewed each paper and online Claim added to the database to verify that all required information was provided. If required information was missing, A.B. Data flagged the deficiency for purposes of providing notice to the Claimants and an opportunity to cure the deficiency (as further discussed below).

12. In order to process the transactions detailed in the Claims, A.B. Data utilized internal codes ("flags") to identify and classify types of Claims and any deficiency or ineligibility conditions that existed within those Claims. The appropriate flags were assigned to the Claims as they were processed. For example, where a Claim was submitted by a claimant that was an ineligible Non-U.S. entity, that Claim would receive a flag that denoted ineligibility. Similar flags were used to denote other ineligibility conditions, such as duplicate Claims. These flags would indicate to A.B. Data that the claimant was not eligible to receive any payment from the Net Settlement Fund with respect to that Claim unless the deficiency was resolved in its entirety. Examples of conditions of ineligibility include the following:

DUPCL Duplicate Claim

NONUS	Ineligible Non-U.S. Entity
NOTRADE	No Transactions on Claim Form
NOLOS	No Transaction Claim Amount
WITHD	Withdrawn Claim

13. Because a Claim may be deficient only in part, but otherwise acceptable, A.B. Data also utilized flags that were applied only to specific transactions within a Claim. For example, if a claimant submitted a Claim with supporting documentation for all but one purchase transaction, that one transaction would receive a transaction-specific flag. That flag indicated that one transaction was deficient, but the Claim was otherwise eligible for payment if other transactions in the Claim calculated to a Transaction Claim Amount pursuant to the Court-approved Distribution Plan. Thus, even if the transaction-specific deficiency was never cured, the acceptable portion of the Claim could still be paid. A few examples of transaction-specific deficiencies are as follows:

INELCPTY	Ineligible Counterparty
INVISIN	ISIN Provided is not Eligible
MISMDT	Missing Maturity Date
NONUSTR	Ineligible Non-U.S. Trade

B. Processing Electronically Filed Claims

14. The remaining 32,626 Claims were submitted electronically ("Electronic Claims") to A.B. Data's Electronic Claim Filing Team ("ECF Team"). Electronic Claims are typically submitted by institutional investors ("Electronic Claim Filers" or "E-Claim Filers") that may have hundreds or thousands of transactions during the relevant period.

15. A.B. Data's Electronic Claim Filing Team ("ECF Team") coordinates and supervises the receipt and handling of all Electronic Claims. In this case, the ECF Team analyzed each electronic file to ensure that the formatting was consistent with A.B. Data's requirements and to

identify any data issues or inconsistencies within the file that may require issuing a deficiency notice to the Claimant (as further discussed below). If the electronic file format was acceptable, it was then loaded to A.B. Data's priority database.

16. Once the electronic file was loaded, the Electronic Claims were flagged to denote any deficient or ineligible conditions that existed within them. The flags applied to the Electronic Claims are similar to those applied to paper Claims; however, in lieu of manually applying flags, the ECF Team performed programmatic reviews on Electronic Claims to identify deficient and ineligible conditions. The appropriate flags were then assigned programmatically once the output of the reviews was thoroughly analyzed and confirmed for accuracy.

17. The review process also included flagging any Electronic Claims that were not accompanied by a signed Claim Form, which serves as a "Master Proof of Claim" for all accounts referenced on the electronic file submitted. Where appropriate, A.B. Data contacted the E-Claim Filers whose submissions were missing information. This process ensured that only fully completed Claims, submitted by properly authorized representatives of the claimants, are considered eligible for payment from the Net Settlement Fund.

C. Authorized Claims

18. A total of 29,749 Claims were submitted on or before the Claim filing deadline of November 27, 2024. Of those Claims, 1,418 Claims were determined by A.B. Data to have eligible European Government Bonds transactions ("Timely Eligible Claims"). These Claims are listed in **Exhibit A**. A total of 28,331 Late Claims were ineligible for reasons other than timeliness.

19. A total of 3,180 Claims were received or postmarked after the November 27, 2024 Claim submission deadline. A.B. Data processed all late Claims received through October 12, 2026, of which 15 Claims had eligible European Government Bonds transactions ("Late But Otherwise Eligible Claims"). These Claims are listed in **Exhibit B**. A.B. Data has not rejected any Claim

received through October 12, 2026 solely based on its late submission, and believes no delay has resulted from the provisional acceptance of these late Claims. A total of 3,165 Late Claims were ineligible for reasons other than timeliness.

20. Accordingly, there are a total of 1,433 Claims with eligible European Government Bonds transactions that A.B. Data recommends that the Court accept (the "Authorized Claims"). These Authorized Claims are eligible to receive a *pro rata* payment pursuant to the Distribution Plan and the proposed distribution procedures below (*see* section VII).

21. A.B. Data recommends that the Court reject the remaining 31,496 Claims, which are listed on **Exhibit C** (the "Rejected Claims"). These Rejected Claims include Claims that: did not have any eligible European Government Bonds transactions or failed to provide the acceptable data (4,434); have been withdrawn (92); have been replaced with a new submission (14,430); were submitted in duplicate (2,052); were an ineligible non-U.S. entity (8,192); or did not satisfy the U.S. domicile or U.S. Trade Location audit (2,296).

22. Thus, after removing the withdrawn, replaced, and duplicate Claims (16,574 in total) from the 32,929 total Claims received, 16,355 Claims remain, of which A.B. Data recommends that 1,433 be accepted and 14,922 be rejected.

II. IDENTIFICATION OF ELIGIBLE CLAIMS AND TRANSACTIONS

23. A.B. Data processed the Claims to determine whether submissions satisfied the Claim- and transaction-level requirements. If a Claim did not satisfy one or more of the eligibility criteria, A.B. Data assigned internal codes ("flags") to the Claim and/or transactions within a Claim that would be used to notify the Claimant of the deficiency or ineligibility condition.

A. Claim-Level Eligibility Analysis

24. Claims were required to meet the following criteria to be eligible to receive a payment from the Net Settlement Fund. There were 19,081 Claims rejected in full at the claim-level under the criteria detailed below.

25. Eligible Transaction During the Settlement Class Period: A Claim must include at least one eligible European Government Bonds[2] transaction during the Settlement Class Period to be considered for payment under the Distribution Plan. If a Claim was submitted without a European Government Bond, A.B. Data notified the Claimant that this deficiency could be cured by providing transaction data containing European Government Bonds. If a Claimant failed to provide any eligible transactions, the Claim was rejected. A total of 211 Claims were rejected for this reason.

26. Claimant or transaction(s) Has a United States Connection: To be eligible to participate in the Settlement, a Claimant had to be either (i) domiciled in the United States or its territories or (ii) if domiciled outside the United States or its territories, transact European Government Bonds directly from a Defendant, Deutsche Bank, or Rabobank from or through a location within the United States or its territories. If the Claimant did not provide information demonstrating this requirement, A.B. Data issued a deficiency notice requesting information about the Persons involved in the eligible transactions and where the transactions were executed. If the Claimant did not provide information satisfying this requirement, the Claim was rejected in its entirety. A total of 2,296 Claims were rejected for this reason.

27. Withdrawn, Replaced, or Duplicate Claims: After submitting their Claims, 92 Claimants withdrew their Claims. Replacement transaction data and supporting information were

[2] "European Government Bonds" or "EGBs" means euro-denominated sovereign debt or bonds issued by European governments (e.g., Austria, Belgium, Cyprus, Estonia, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, Malta, the Netherlands, Portugal, Slovakia, Slovenia, and Spain). ECF No. 530, 3 n.1 (Judgment Approving Class Action Settlement).

also submitted for 14,430 Claims. Upon receiving the replacement Claim, A.B. Data marked the original submission as deficient and considered the replacement Claim as the operative submission. Finally, a Claimant may not submit more than one Claim involving the same European Government Bonds transactions. A.B. Data identified a total of 2,052 duplicate Claims. When this occurred, the duplicate Claim was marked as ineligible.

B. Transaction-Level Eligibility Analysis

28. A.B. Data separately determined whether each transaction submitted as part of a Claim was individually eligible under the Distribution Plan. Certain flags were used by A.B. Data to identify transaction-level deficiencies or ineligibility conditions. These flags would indicate to A.B. Data that the specific transactions could not be included in the Transaction Claim Amount calculation unless the deficiency was cured. Transaction-level deficiencies included:

(a) The transaction was not a European Government Bond transaction;

(b) The transaction occurred outside of the United States (for non-U.S. domiciled Claimants);

(c) The ISIN provided was not eligible; or

(d) Missing or incomplete transaction data.

29. A total of 12,415 Claims were rejected in full because all the transactions underlying these Claims were determined to be ineligible. 842 Claims included some transaction-level deficiencies and were therefore accepted in part and rejected in part.

III. DEFICIENCY LETTERS

30. After completion of the eligibility analysis process outlined above, A.B. Data notified Claimants whose Claims were incomplete or had one or more deficiencies via mail or email of the

applicable deficiency or ineligibility and provided instructions on how to cure the relevant deficiency (the "Deficiency Letter"). The correspondence:

(a) Identified the relevant claim-level and/or transaction-level deficiencies present in the Claim and described what, if anything, was necessary to cure the defect(s) in the Claim;

(b) Stated that any claim-level deficiencies that were not corrected within the time period specified would result in the rejection of the Claim in its entirety, and any transaction-level deficiencies that were not corrected within the time period specified would result in the rejection of the transaction from the Transaction Claim Amount calculation under the Distribution Plan;

(c) Advised Claimants of the right to contest the rejection of their Claims or certain transaction(s) in their Claims by requesting Court review of A.B. Data's administrative determination of deficiencies or ineligibility; and

(d) Provided instructions on how to submit corrections (if applicable) or contest the rejection and specified what supporting documentation should be provided.

31. For each Claim that included one or more underlying transaction(s) flagged as deficient or ineligible, as discussed in §II.B., the correspondence informed the Claimant of each defect on a transaction-by-transaction basis.

32. When requested, A.B. Data also provided support to Claimants who needed technical assistance in resolving deficiencies. The purpose of the deficiency process was to help Claimants cure their deficiencies so that they could participate in the Settlement and receive a payment from the Net Settlement Fund. The bulk of A.B. Data's claims administration time and effort was devoted to this process.

33. A Claimant's response (if any) to the deficiencies was loaded into A.B. Data's database and associated with the corresponding Claims. The response was then evaluated by A.B. Data's team of processors. If a Claimant's response corrected the defect(s), A.B. Data updated the

database to reflect the changes in the status of the Claim. If Claim-level deficiencies were not cured, the Claim was rejected and included in **Exhibit C** (Rejected Claims). If transaction-level deficiencies were not cured, such transactions were excluded from the calculation of the Transaction Claim Amount under the Distribution Plan.

34. A sample Deficiency Letter is attached hereto as **Exhibit D**.

IV. DISPUTED CLAIMS

35. As noted above, claimants were advised that they had the right to contest A.B. Data's administrative determinations with respect to the deficiencies in, or ineligibility of, their Claims within twenty (20) days from the date of notification and that they could request that the dispute be submitted to the Court for review. More specifically, claimants were advised that if they disputed A.B. Data's administrative determinations, they had to provide a statement indicating the grounds for contesting the determination along with supporting documentation, and if the dispute concerning the Claim could not otherwise be resolved, Lead Counsel would thereafter present the request for review to the Court for a final determination.

36. In response to the notifications of deficient or ineligible Proofs of Claim, one claimant requested Court review for two claims. To resolve this dispute without requiring the Court's intervention, A.B. Data contacted this claimant to explain A.B. Data's administrative determination of the Claims' statuses and to facilitate the submission of missing information. The claimant did not provide the information needed to calculate the Claims, so this request for Court review of the two claims remains outstanding. Attached hereto as **Exhibit E** is the pending request for Court review.

V. QUALITY ASSURANCE REVIEW

37. Throughout the administration process, A.B. Data's Quality Assurance Department verified the accuracy of the claims administration process by checking that information was entered correctly into the database, deficiency and/or rejection flags were assigned accurately, and deficiency

and/or rejection notifications were sent appropriately. In effect, the Quality Assurance Department operated as an independent auditor to ensure settlement administration followed the Distribution Plan and commonly accepted practices. A.B. Data's supervisors and managers in the Quality Assurance Department performed additional Quality Assurance Reviews ("QARs") to assess the correctness and completeness of all Claims prior to preparing this Declaration and all of A.B. Data's final documents in support of distribution of the Net Settlement Fund. As part of the QARs, A.B. Data:

(a) Verified that all Claims had signatures of authorized individuals;

(b) Verified that true duplicate Claims were identified, verified, and rejected;

(c) Verified that persons and entities excluded from the Class did not file Claims and, if such persons or entities did file Claims, that their Claims were rejected or properly excluded from the *pro rata* calculation of the Net Settlement Fund;

(d) Performed a final Quality Assurance audit of Claims and all supporting documentation to ensure completeness of Claims;

(e) Performed a review of deficient or invalid Claims;

(f) Determined that all Claimants requiring deficiency and/or rejection notification were sent such notification;

(g) Performed additional review of Claims with a high Distribution Amount;

(h) Audited Claims whose Transaction Claim Amount calculation was equal to zero;

(i) Performed other auditing based on Claims completion requirements and the approved calculation specifications based on the Distribution Plan; and

(j) Re-tested the accuracy of the program that calculated the allocation from the Net Settlement Fund.

After completing its QARs, A.B. Data notified Claimants (if applicable) of any results that impacted their Claims.

38. As part of its due diligence, A.B. Data also, among other things, cross-checked all Claims filed in the Settlement against its database of known questionable filers (the "Questionable Claim Filer Database"), which contains the names, addresses, and aliases of individuals or entities that have been investigated by government agencies for questionable claim filing. A.B. Data updates this Questionable Claim Filer Database on a regular basis. In addition, A.B. Data's claim processors are trained to identify any potentially inauthentic documentation when processing claims, including claims submitted by Claimants not previously captured in the Questionable Claim Filer Database. Processors are instructed to flag any questionable claims and escalate them to management for review.

VI. PROPOSED BAR DATE

39. Of the 32,929 Claims received, 3,180 were received after the November 27, 2024 Claim submission deadline. A.B. Data processed all late Claims received through October 12, 2026, and 15 have been found to be otherwise eligible in whole or in part. A.B. Data has not rejected any Claim received through October 12, 2026 solely based on its late submission, and A.B. Data believes no delay has resulted from the provisional acceptance of any late Claim because the processing of timely received Claims was still ongoing. Thus, to the extent these Claims are eligible, but for the fact that they were late, they are recommended for payment.

40. However, there must be a final cut-off date after which no more Claims will be accepted so that there may be a proportional allocation of the Net Settlement Fund and the distribution may be accomplished. Acceptance of additional Claims or responses to notices of deficiency received during the finalization of the administration and the preparation of this application would necessarily require a delay in the distribution.

41. Accordingly, A.B. Data also respectfully requests that the Court order that no Claim received after October 12, 2026 be eligible for payment from the Net Settlement Fund for any reason whatsoever and that no further adjustments or corrections to Claims submitted after October XX, 2026 may be accepted.

VII. PROPOSED PROCEDURE TO DISTRIBUTE THE NET SETTLEMENT FUND

42. Payments to Authorized Claimants are estimated to range from approximately $100.00 to $24,000,000.00.

43. Should the Court approve A.B. Data's determinations concerning the accepted and rejected Claims, A.B. Data recommends the following distribution plan for the Net Settlement Fund (the "Distribution Procedure"):

(a) A.B. Data will conduct an initial distribution (the "Initial Distribution") of the Net Settlement Fund, after deducting A.B. Data's fees and expenses incurred in connection with administering the Settlement for which it has not yet been paid (including the estimated costs of such Initial Distribution), and after deducting the payment of any estimated taxes, the costs of preparing appropriate tax returns, and any escrow fees, as follows:

1. A.B. Data will calculate award amounts to all Authorized Claimants by calculating their *pro rata* shares of the Net Settlement Fund in accordance with the Court-approved Plan of Distribution.

2. A.B. Data recommends, pursuant to the terms of the Distribution Plan, that any Authorized Claimant whose Distribution Amount is greater than $0 and less than $100 receive a minimum payment of $100 (the "Minimum Payment") from the Net Settlement Fund. This Minimum Payment was determined by evaluating the amount of the Net Settlement Fund that would be reallocated by setting this threshold and the administrative savings of implementing this payment floor. Under the Distribution Plan, approximately 387 claimants will receive the Minimum Payment. The total amount of this Minimum Payment comprises approximately .05% of the Net Settlement Fund, or $38,700. In contrast, if these Authorized Claimants were paid their award amount based on their *pro rata* fraction, the payments would total $11,385 or approximately .01% of the Net Settlement Fund. Setting the Minimum Payment will reallocate just .04% of the Net Settlement Fund toward paying these claimants.

3. After excluding Authorized Claimants who will receive the Minimum Payment, A.B. Data will recalculate the Distribution Amounts for the remaining Authorized Claimants.

4. Authorized Claimants whose Distribution Amount calculates to between $100.00 and less than $100,000.00 will be paid their full *pro rata* Distribution Amount in the Initial Distribution. There are approximately 974 Authorized Claimants whose Distribution

Amount is between $100.00 and less than $100,000.00 based on their *pro rata* share calculation.

5. Authorized Claimants whose Distribution Amount calculates to equal or more than $100,000.00 will receive 90% of their Distribution Amount in the Initial Distribution. For example, if an Authorized Claimant's Distribution Amount is $100,000.00, it will receive $90,000.00 in the Initial Distribution. There are approximately 72 Authorized Claimants whose *pro rata* Distribution Amount is equal to or greater than $100,000.00.

6. The remaining 10% will be held in reserve to address any claims administration-related contingencies that may arise, which is a routine and customary practice among claims administrators in settlements with complex administration procedures, such as this one. To the extent the reserve is not depleted, the remainder will be distributed in the "Second Distribution" described in subparagraph (d) below.

(b) To encourage authorized Claimants to deposit their payments promptly, and to avoid or reduce future expenses relating to uncashed checks all Initial Distribution checks will bear a notation: "**CASH PROMPTLY. VOID AND SUBJECT TO REDISTRIBUTION IF NOT NEGOTIATED WITHIN 90 DAYS OF ISSUE DATE**."[3] For Authorized Claimants whose checks are

[3] In an effort to have as many Authorized Claimants as possible cash their checks, A.B. Data will perform follow-up with those Authorized Claimants whose checks are initially uncashed, either because they are returned to A.B. Data as undeliverable or because the Authorized Claimant simply did not cash the check after a period of time elapses. For Authorized Claimants whose checks are returned as undeliverable, A.B. Data will endeavor to locate new addresses by running the

returned as undeliverable, A.B. Data will endeavor to locate new addresses by running the undeliverable addresses through address-lookup services and/or when possible, by emailing the Authorized Claimant for updated information. Where a new address is located, A.B. Data will update the database accordingly and reissue a distribution check to the Authorized Claimant at the new address. In the event a distribution check is lost or damaged or otherwise requires reissuance, A.B. data will issue a replacement. Distribution reissues will be undertaken only upon written instructions from the Authorized Claimant, provided that the Authorized Claimant returns the previous check if appropriate. For all reissued checks, A.B. Data will void the initial payment prior to reissuing a payment. To avoid delaying further distributions to Authorized Claimants who have timely cashed their checks, A.B. Data's outreach program shall end 30 days after the initial void date. Authorized Claimants will be informed that, if they do not cash their Initial Distribution checks within 90 days of the mail date, or do not cash reissued checks within 30 days of the mailing of such reissued checks, their checks will lapse, their entitlement to recover will be irrevocably forfeited, and the funds will be reallocated to other Authorized Claimants. Reissue

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undeliverable addresses through address lookup services. Where a new address is located, A.B. Data will update it accordingly, and reissue a distribution check to the Authorized Claimant at the new address. In the event an Authorized Claimant loses or damages his, her, or its check, or otherwise requires a new check, A.B. Data will issue replacements. Distribution reissues will be undertaken only upon written instructions from the Authorized Claimant, provided that the Authorized Claimant returns the previous check where appropriate. For all checks, A.B. Data will void the initial payment prior to reissuing a payment. Authorized Claimants requesting reissuance of checks will be informed that if they do not cash their Initial Distribution checks within 30 days of the mailing of such reissued checks, their check will lapse, their entitlement to recovery will be irrevocably forfeited, and the funds will be reallocated to other Authorized Claimants. Reissue requests for lost or damaged checks will be granted after the void date on the checks; however, void dates on such reissues will be adjusted so as not to delay future redistributions. Requests for reissued checks in connection with the Second Distribution and any subsequent distributions will be handled in the same manner.

requests for lost or damaged checks will be granted after the void date on the checks as long as the request for the reissue is received no later than 45 days prior to the next planned distribution. Requests for reissued checks in connection with any subsequent distributions (should such distributions occur) will be handled in the same manner. Subsequent distributions will have a 30-day stale date.

(c) For Authorized Claimants that do not negotiate their Initial Distribution checks within the time allotted or according to the conditions set forth in footnote 3 will irrevocably forfeit all recovery from the Settlement. The funds allocated to all such stale-dated checks will be available for redistribution to other Authorized Claimants in the Second Distribution described below. Similarly, Authorized Claimants that do not negotiate subsequent distributions within the time allotted or according to the conditions set forth in footnote 3 will irrevocably forfeit any further recovery from the Settlement.

(d) After A.B. Data has made reasonable and diligent efforts to have Authorized Claimants negotiate their Initial Distribution checks, if there is any balance remaining in the Net Settlement Fund after at least six (6) months after the Initial Distribution (whether by reason of tax refunds, uncashed checks, or otherwise), then, if Lead Counsel, in consultation with A.B. Data, determine that it is cost-effective to do so, A.B. Data will conduct a second distribution of the Net Settlement Fund (the "Second Distribution"). Any amounts remaining in the Net Settlement Fund after the Initial Distribution, after deducting A.B. Data's fees and expenses incurred in connection with administering the Settlement for which it has not yet been paid (including the estimated costs of such Second Distribution), and after deducting the payment of any estimated taxes, the costs of preparing

appropriate tax returns, and any escrow fees, will be distributed to all Authorized Claimants whose Initial Distribution Amount calculated to $100,000 or more and who cashed their Initial Distribution checks.

(e) Additional redistributions to Authorized Claimants who have cashed their prior checks will continue if Lead Counsel, in consultation with A.B. Data, determine that such redistributions will be cost-effective, after deducting A.B. Data's fees and expenses incurred in connection with administering the Settlement for which it has not yet been paid (including the estimated costs of such further distribution), and after deducting the payment of any estimated taxes, the costs of preparing appropriate tax returns, and any escrow fees.

(f) *Cy pres* contribution of any remaining balance that is not cost-effective to reallocate to will be made to Legal Services NYC, a 501(c)(3) tax-exempt organization, after deducting A.B. Data's fees and expenses incurred in connection with administering the Settlement for which it has not yet been paid (including the estimated costs of such further distribution), and after deducting the payment of any estimated taxes, the costs of preparing appropriate tax returns, and any escrow fees.

(g) No new Claim Form may be accepted after October 12, 2026, and no further adjustments to submitted Claim Forms may be made for any reason after October 12, 2026.

(h) Unless otherwise ordered by the Court, A.B. Data asks that it be permitted to destroy paper and electronic copies of the Claims and all supporting documentation one year after all funds from this Settlement have been distributed.

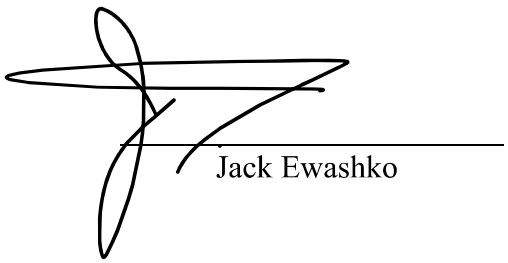
44. To date, A.B. Data's fees and expenses for notice and administration for the Settlement total $1,027,189.25, for which A.B. Data has been or will be paid in full. A.B. Data anticipates that the additional cost to complete the initial and second distribution of the Net Settlement Fund will be $31,869.27.

CONCLUSION

45. A.B. Data respectfully requests that the Court enter an Order approving its administrative determinations accepting and rejecting the Claims submitted herein and approving the proposed Distribution Procedure.

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

Executed on October 30, 2026.



Jack Ewashko

CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2026, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

s/Patrick J. Rodriguez
Patrick J. Rodriguez