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 ON BEHALF OF A.B. DATA, LTD.
REGARDING NOTICE ADMINISTRATION

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

1. I am a Client Services Director of A.B. Data, Ltd.'s Class Action Administration Company ("A.B. Data" or "Settlement Administrator"). I am over 21 years of age and am not a party to the above-captioned action ("Action"). My business address is 600 A.B. Data Drive, Milwaukee, WI 53217, and my telephone number is 414-961-7555. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. I respectfully submit this Declaration to provide the Court and the parties to the Action with information regarding A.B. Data's execution of the Court-approved Class Notice plan, including the mailing of the Notice of Pendency of Class Action, Hearing on Proposed Settlements and Attorneys' Fees Petition, and Right to Share in Net Settlement Fund (the "Long-Form Notice"), publication of Summary Notice of Proposed Class Action Settlements (the "Summary Notice"), establishment and maintenance of a case-specific website (the "Settlement website"), and other administrative activities.

3. Pursuant to the Order Approving Class Notice Plan, Preliminarily Approving Distribution Plan for Class Action Settlements with Defendants JPMorgan Chase Bank, N.A., J.P. Morgan Securities PLC, J.P. Morgan Securities LLC, State Street Corporation, and State Street Bank

and Trust Company, and Scheduling Hearing for Final Approval of the Settlements, entered on November 17, 2022 (ECF No. 315) (the "Preliminary Approval Order") and the Amended Preliminary Approval Orders dated July 12, 2023 (ECF Nos. 381-82) ("Amended Orders"), A.B. Data was authorized to act as the Claims Administrator in connection with the proposed settlements (the "Settlements") in the Action.

4. Pursuant to the Preliminary Approval Order and the Amended Orders, the Court directed A.B. Data to execute the Court-approved Class Notice plan, which, as implemented, consisted of the following:

A. Mailing a detailed Notice Packet to members of the Settlement Class who could be identified through reasonable effort; and nominee owners, such as brokerage firms and other persons or entities who or which transacted for the beneficial interest of persons or organizations other than themselves, either requested sufficient copies of the Long-Form Notice to forward to all such beneficial owners, or provided names and addresses of all such beneficial owners to the Claims Administrator for prompt distribution;

B. Publishing and releasing the Summary Notice via print and electronic media in *IBD Weekly, Stocks & Commodities, The New York Times*, *The Wall Street Journal* and the *Financial Times*;

C. Implementing digital and social media campaigns through: (i) banner advertisements for thirty days on hundreds of websites including, but not limited to: (a) marketplace.com; (b) cnbc.com; and (c) finance.yahoo.com; (ii) newsfeed ads placed on LinkedIn; and (iii) sponsored search listings placed through the Google search engine;

D. Disseminating a news release via *PR Newswire*'s US1 Newsline distribution list; and

E. Establishing the Settlement Website at EuropeanGovernmentBondsSettlement.com and posting copies of the Long-Form Notice, Summary Notice, and other case-related documents in downloadable form.

DIRECT MAIL NOTICE

5. Pursuant to the Preliminary Approval Order, notice originally commenced on February 1, 2023 with respect to the proposed Settlements with JPMorgan Chase Bank, N.A., J.P. Morgan Securities PLC, and J.P. Morgan Securities LLC (collectively, "JPMorgan") and State Street Corporation, and State Street Bank and Trust Company (collectively, "State Street").

6. On or about October 25, 2022, A.B. Data received from Plaintiffs' Counsel a list of potential Class Members. A.B. Data electronically processed the data to ensure adequate address formatting and the elimination of duplicate names and addresses, resulting in 597 distinct records for mailing.

7. A.B. Data maintains a proprietary database with names and addresses of the largest and most common banks, brokers and other nominees (the "Record Holder Mailing Database"). At the time of the initial mailing, the Record Holder Mailing Database contained 4,977 mailing records. The Record Holder Mailing Database was combined with the 597 records referenced in ¶ 6, for a total of 5,574 records (the "Initial Mailing Database") to be used to mail the Notice Packets.

8. Through March 20, 2023, A.B. Data mailed 5,644 Notice Packets to potential Settlement Class Members via first-class mail and, as described in the Declaration of Elaine Pang (ECF No. 312-1), A.B. Data utilized paid, digital, and earned media to reach potential Settlement Class Members.

9. On March 21, 2023, the Court vacated the deadlines provided on the Preliminary Approval Order (ECF No. 335). On April 19, 2023, A.B. Data updated the Settlement website to provide the status of the Settlements. On May 16, 2023, the Court entered its Order Modifying Schedule for Final Approval of the Class Action Settlements with Defendants JPMorgan Chase

Bank, N.A., J.P. Morgan Securities PLC, J.P. Morgan Securities LLC, State Street Corporation, and State Street Bank and Trust Company (ECF No. 355) resetting the date of the fairness hearing for the JPMorgan and State Street Settlements and the related deadlines. On June 1, 2023, the fairness hearing date and related deadlines were further modified by order of the Court (ECF No. 363). Pursuant to the June 1, 2023 order and the Amended Orders, notice re-commenced on September 5, 2023.

10. On or about July 24, 2023, A.B. Data received from Co-Lead Counsel an additional list of potential Settlement Class Members.

11. A.B. Data electronically processed the data referenced in ¶ 10 above to ensure adequate address formatting and the elimination of duplicate names and addresses, resulting in 116 distinct records for mailing. A.B. Data standardized and updated the addresses using NCOALink®, a national database of address changes that is compiled by the United States Postal Service (the "USPS").

12. A.B. Data compiled all of the names and addresses referenced in ¶ 10 and the names and addresses from the Initial Mailing Database (¶ 7), resulting in 5,760 distinct records for mailing.

13. Pursuant to paragraph 4 of the Amended Order, on September 5, 2023, A.B. Data caused 5,760 Notice Packets to be mailed via first-class mail, postage prepaid, to persons and entities in the database. A true and correct copy of the Notice Packet is attached hereto as **Exhibit A**.

14. Pursuant to paragraph 6 of the Amended Order, by email, A.B. Data requested that Nominees who or which entered into European Government Bond transactions with a Defendant or a Defendant affiliate during the Class Period (January 1, 2007, and December 31, 2012) for the

beneficial interest of persons or entities other than themselves provide A.B. Data with the names and addresses of all such beneficial owners or request from A.B. Data sufficient copies of the Notice Packet to forward to all such beneficial owners, and within seven calendar days of receipt of those Notice Packets, forward them to all such beneficial owners. A.B. Data then caused the Notice Packet to be mailed promptly to the beneficial owners whose information was provided.

15. Following the initial mailing, A.B. Data received an additional 641 unique names and addresses of potential Settlement Class Members.

16. As of October 25, 2023, A.B. Data mailed 6,401 Notice Packets to potential Settlement Class Members pursuant to the Amended Orders.

17. Additionally, due to certain Defendants' concerns regarding foreign bank secrecy and/or data privacy laws, certain Defendants or their third-party noticing agent sent Notice Packets to potential Settlement Class Members. As a result of this process, the following information has been provided to A.B. Data by the respective Defendant or its noticing agent:

a. Rust Consulting mailed 2,287 to potential Settlement Class Members;

MEDIA NOTICE

18. In accordance with the Amended Orders and as described in the Declaration of Elaine Pang (ECF No. 349-3), A.B. Data utilized paid, digital, and earned media to reach potential Settlement Class Members as set forth below.

News Release

19. On September 5, 2023, A.B. Data caused the Summary Notice to be released via *PR Newswire*. A true and correct copy of proof of the publication over *PR Newswire* is attached hereto as **Exhibit B**.

Summary Notice

20. Beginning on September 11, 2023, A.B. Data caused the Summary Notice to be placed in *IBD Weekly*, *Stocks & Commodities*, *The New York Times*, *The Wall Street Journal* and the *Financial Times*. A true and correct copy of the Summary Notice is attached hereto as **Exhibit C**.

Digital and Social Media Campaigns

21. Starting on or about September 5, 2023, A.B. Data began running banner advertisements on the various financial and business websites, such as zacks.com, WSJ.com, reuters.com, Markets.businessinsider.com, Mobile-Bloomberg.com and finance.yahoo.com. The banner ads were placed in premium positioning on multiple devices, including desktop, tablet, and mobile devices. Viewers were able to click on the banner advertisement and instantly be directed to the Settlement Website. True and correct copies of the banner advertisements are attached hereto as **Exhibit D**.

22. On or about September 5, 2023, A.B. Data coordinated ads to run on LinkedIn, which directed viewers to the Settlement Website. A sample copy of the LinkedIn ad is attached hereto as **Exhibit E**.

23. On or about September 5, 2023, A.B. Data coordinated search ads to run on Google AdWords, which directed viewers to the Settlement Website. A sample copy of the Google AdWords ad is attached hereto as **Exhibit F**.

WEBSITE

24. In accordance with the Preliminary Approval Order, on or before February 1, 2023, A.B. Data established the Settlement Website. The website lists, among other things, important dates, including the exclusion, objection, and claim filing deadlines and the date and time of the

Fairness Hearing; a summary of the case and Settlement Class Members' rights and options; relevant documents; and any pertinent updates concerning the Action. The Settlement Website also provides answers to frequently asked questions. Users of the Settlement Website can view and download copies of the Settlement Agreement, Preliminary Approval Order, Amended Orders, Long-Form Notice, Summary Notice, Proof of Claim and Release, eligible bond list, and copies of other court documents. Users of the Settlement Website can also file a claim. A true and correct copy of the Settlement Website home page is attached as **Exhibit G**.

25. Additionally, the Settlement Website includes an email address (info@EuropeanGovernmentBondSettlement.com) for potential Settlement Class Members to contact A.B. Data with questions or ask for additional information. The Settlement Website also includes the email addresses of Co-Lead Counsel should potential Settlement Class Members wish to contact them with any further questions.

26. As of the date of this Declaration, the website has been visited 27,198 times.

TOLL-FREE TELEPHONE LINE

27. In accordance with the Preliminary Approval Order, on or before February 1, 2023, a case-specific toll-free telephone number, 877-883-7336, was established with an Interactive Voice Response system and live operators. Callers to the toll-free number are presented with a series of choices to respond to basic questions. If callers needed further assistance, they have the option to be transferred to a live operator during business hours.

28. As of the date of this Declaration, 106 callers have called the toll-free number.

REPORT ON EXCLUSIONS

29. Pursuant to paragraph 10 of the Preliminary Approval Order, and paragraph 11 of the Amended Orders, and paragraph 18 of the Long-Form Notice, Settlement Class Members

requesting exclusion from the Settlement Class were to provide in writing the following information: (a) the name, address, and telephone number of the member of the Settlement Class; (b) a list of all trade names or business names that member of the Settlement Class requests to be excluded; (c) the name of the Action ("*In re European Government Bonds Antitrust Litigati*on, No. 1:19-cv-2601 (S.D.N.Y)"); (d) a statement certifying such person is a member of the Settlement Class; (e) documents sufficient to prove membership in the Settlement Class; (f) a statement that "I/we hereby request that I/we be excluded from the Settlement Class as it relates to the JPMorgan, State Street, UniCredit, [and/or] Natixis Settlements," as applicable; (g) the signature of the person or entity requesting the exclusion or an authorized representative, as well as proof of authorization to submit the request for exclusion if submitted by an authorized representative. The request for exclusion must be signed by the Settlement Class Member. The written Request for Exclusion must be mailed such that is received by November 13, 2023.

30. A.B. Data has not received any requests for exclusion.

REPORT ON OBJECTIONS

31. Pursuant to paragraphs 12-14 of the Preliminary Approval Order, paragraphs 13-15 of the Amended Preliminary Approval Orders, and paragraph 23 of the Long-Form Notice, Settlement Class Members who wish to object to the proposed Settlements, proposed Distribution Plan, application for an award of attorneys' fees, litigation expenses and/or any service awards for Plaintiffs are to file such objection with the Court and to serve on Co-Lead Counsel and all counsel for Settling Defendants no later than November 13, 2023.

32. On March 13, 2023, A.B. Data received one objection to the State Street Settlement and confirmed that the Co-Lead Counsel also received the objection.

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

Executed this 30th day of October 2023.

Jack Ewashko

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re European Government Bonds Antitrust Litigation	No. 1:19-cv-2601 (VM)

NOTICE OF PENDENCY OF CLASS ACTION, HEARING ON PROPOSED SETTLEMENTS AND ATTORNEYS' FEES PETITION, AND RIGHT TO SHARE IN NET SETTLEMENT FUND

PLEASE READ THIS ENTIRE NOTICE CAREFULLY. A UNITED STATES FEDERAL COURT AUTHORIZED THIS NOTICE. YOUR RIGHTS MAY BE AFFECTED BY THE PROCEEDINGS IN THIS ACTION. THIS NOTICE ADVISES YOU OF YOUR RIGHTS AND OPTIONS WITH RESPECT TO THE ACTION, INCLUDING WHAT YOU MUST DO IF YOU WISH TO SHARE IN THE PROCEEDS OF THE NET SETTLEMENT FUND. TO CLAIM YOUR SHARE OF THE NET SETTLEMENT FUND, YOU MUST ELECTRONICALLY SUBMIT YOUR CLAIM FORM SO THAT IT IS RECEIVED NO LATER THAN NOVEMBER 28, 2023.

To: All persons and entities who or which purchased or sold one or more European Government Bond(s) in the United States directly from a Defendant, Deutsche Bank, or Rabobank, or a direct or indirect parent, subsidiary, affiliate, or division of a Defendant, Deutsche Bank, or Rabobank, or any of their alleged co-conspirators, from January 1, 2005 through December 31, 2016.

"European Government Bonds" 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).

This Notice of Pendency of Class Action, Hearing on Proposed Settlements and Attorneys' Fees Petition, and Right to Share in Net Settlement Fund ("Notice") is given pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Southern District of New York (the "Court"). It is not junk mail, an advertisement, or a solicitation from a lawyer. You have not been sued.

You may have previously received a notice regarding the Stipulation and Agreement of Settlement with JPMorgan Chase Bank, N.A., J.P. Morgan Securities PLC (f/k/a J.P. Morgan Securities Ltd.), and J.P. Morgan Securities LLC (f/k/a J.P. Morgan Securities Inc.) (the "JPMorgan Stipulation") and the Stipulation and Agreement of Settlement with State Street Corporation and State Street Bank and Trust Company (the "State Street Stipulation" and, together with the JPMorgan Stipulation, the "JPMorgan and State Street Stipulations"). **The deadlines for the JPMorgan and State Street Stipulations have been vacated. This Notice supersedes the prior notice and provides updated deadlines and information regarding two new and additional settlements with UniCredit Bank AG and Natixis S.A.**

The capitalized terms in these paragraphs, as well as other capitalized terms, are explained or defined below or in the JPMorgan and State Street Stipulations, Stipulation and Agreement of Settlement with UniCredit Bank AG (the "UniCredit Stipulation"), and the Stipulation and Agreement of Settlement with Natixis S.A. (the "Natixis Stipulation" and, together with the UniCredit Stipulation, the "UniCredit and Natixis Stipulations"). The UniCredit and Natixis Stipulations, the JPMorgan and State Street Stipulations, and the Court's Preliminary Approval Orders are posted on the Claims Administrator's website at www.EuropeanGovernmentBondsSettlement.com (the "Settlement Website").

The purpose of this Notice is to inform you of the separate settlements ("Settlements") with JPMorgan Chase Bank, N.A., J.P. Morgan Securities PLC (f/k/a J.P. Morgan Securities Ltd.), and J.P. Morgan Securities LLC (f/k/a J.P. Morgan Securities Inc.) together with their affiliates and subsidiaries ("JPMorgan"), State Street Corporation and State Street Bank and Trust Company together with their affiliates and subsidiaries ("State Street"), UniCredit Bank AG together with its affiliates and subsidiaries ("UniCredit"), and Natixis S.A. together with its affiliates and subsidiaries ("Natixis") (collectively, the "Settling Defendants").

Please do not contact the Court regarding this Notice. Inquiries concerning this Notice, the Proof of Claim and Release Form (the "Claim Form"), or any other questions related to the Settlements should be directed to:

European Government Bonds Settlement
c/o A.B. Data, Ltd.
P.O. Box 173119
Milwaukee, WI 53217
Tel.: 1-877-883-7336
Email: info@EuropeanGovernmentBondsSettlement.com
Website: www.EuropeanGovernmentBondsSettlement.com

Plaintiffs allege in this action that Bank of America, N.A. and Merrill Lynch International (together, "Bank of America"); Natixis; NatWest Markets plc (f/k/a Royal Bank of Scotland plc) and NatWest Markets Securities Inc. (f/k/a RBS Securities Inc.) (together, "NatWest"); Nomura Securities International Inc. and Nomura International PLC (together, "Nomura"); UBS AG, UBS Europe SE, and UBS Securities LLC f/k/a UBS Warburg LLC (collectively, "UBS"); UniCredit; Citigroup Global Markets Limited and Citigroup Global Markets Inc. (together, "Citigroup"); JPMorgan; RBC Europe Limited f/k/a Royal Bank of Canada Europe Limited, Royal Bank of Canada, and RBC Capital Markets, LLC (f/k/a Dain Rauscher Inc.) (collectively, "RBC"); Jefferies International Limited and Jefferies LLC (f/k/a Jefferies & Company, Inc.) (together, "Jefferies"); and State Street conspired to fix prices of European Government Bonds, in both the primary and secondary markets in violation of §1 of the Sherman Antitrust Act, 15 U.S.C. §1. Plaintiffs also allege that various entities and individuals unknown to Plaintiffs at this time participated as co-conspirators in the acts complained of and performed acts and made statements that aided and abetted and were in furtherance of the unlawful conduct alleged.

Plaintiffs also allege in a related action, *Ohio Carpenters' Pension Fund, et al. v. Deutsche Bank, et al.*, No. 1:22-cv-10462-VM (S.D.N.Y.) ("EGB II"), that Deutsche Bank AG and Deutsche Bank Securities Inc. (together, "Deutsche Bank); and Cooperatieve Rabobank U.A. (f/k/a Cooperatieve Centrale Raiffeisen-Boerenleenbank B.A.) and Rabo Securities USA, Inc. (together, "Rabobank") conspired to fix prices of European Government Bonds in the secondary market in violation of §1 of the Sherman Antitrust Act, 15 U.S.C. §1 and that various entities and individuals unknown to Plaintiffs at this time participated as co-conspirators in the acts complained of and performed acts and made statements that aided and abetted and were in furtherance of the unlawful conduct alleged.

The Court preliminarily approved the Settlements with JPMorgan, State Street, UniCredit, and Natixis. To resolve all Settled Claims against it, JPMorgan agreed to pay a total of $13 million in cash and provide cooperation, including the production of documents, transaction data, and deposition and trial witnesses ("Cooperation Material") in connection with Plaintiffs' continued prosecution of claims against the non-settling Defendants. To resolve all Settled Claims against it, State Street, which was the first Defendant to settle with Plaintiffs, agreed to provide Cooperation Materials in connection with Plaintiffs' continued prosecution of claims against the non-settling Defendants. To resolve all Settled Claims against it, UniCredit agreed to pay a total of $13 million in cash and provide Cooperation Materials in connection with Plaintiffs' continued prosecution of claims against the non-settling Defendants and against the defendants in EGB II. To resolve all Settled Claims against it, Natixis agreed to pay a total of $14 million in cash and provide Cooperation Materials in connection with Plaintiffs' continued prosecution of claims against the non-settling Defendants and against the defendants in EGB II. Co-Lead Counsel believe that the Cooperation Materials have and will continue to aid Plaintiffs in pursuing their claims against the non-settling Defendants (with the exception of the RBC entities and Nomura Securities International Inc., which have been dismissed from the Action). Settlement Class Members will not, by participating in the Settlements, be releasing their claims against the non-settling Defendants.

The following table contains a summary of your rights and options regarding the Settlements. More detailed information about your rights and options can be found in the Stipulations and Distribution Plan, all of which are available at www.EuropeanGovernmentBondsSettlement.com.

YOUR LEGAL RIGHTS AND OPTIONS IN THESE SETTLEMENTS	
DO NOTHING	You are automatically part of the Settlement Class if you fit the Settlement Class description. However, if you do not timely submit a valid Claim Form, you will not receive any payment from the Net Settlement Fund. You will be bound by past and any future Court rulings, including rulings on the Settlements, if approved, and Releases, but will not be eligible to receive any payment from the Net Settlement Fund. *See* Question 17.
SUBMIT A CLAIM FORM	You may be eligible to share in the Net Settlement Fund if you submit a valid Claim Form by no later than **November 28, 2023**. If you submit a Claim Form, you will remain in the Settlement Class if you are a Settlement Class Member. If you already submitted a Claim Form for the JPMorgan Settlement, you may want to resubmit your claim form to include additional European Government Bonds you traded. The UniCredit and Natixis Settlement Class includes European Government Bond transactions with Defendants, Deutsche Bank, and Rabobank, from January 1, 2005 through December 31, 2016. *See* Question 7. You will be bound by past and any future Court rulings, including rulings on the Settlements, if approved, and Releases. *See* Question 11.
EXCLUDE YOURSELF FROM THE SETTLEMENTS	If you wish to exclude yourself from the Settlement(s), you must submit a written request so that it is received by **November 13, 2023**. If you exclude yourself, you will not be bound by the Settlement(s), if approved, or Settlement Release(s), and you will not be eligible for any payment from the Net Settlement Fund. *See* Questions 18 through 22.
OBJECT TO THE SETTLEMENTS	If you wish to object to the Settlement(s), you must file a written objection with the Court by **November 13, 2023** and serve copies on Co-Lead Counsel, JPMorgan's Counsel, State Street's Counsel, UniCredit's Counsel, and Natixis's Counsel. You must be and remain within the Settlement Class in order to object. *See* Questions 23 and 24.
GO TO THE SETTLEMENT HEARING	You may ask the Court for permission to speak at the Settlement Hearing about the Settlements by including such a request in your written objection, which you must file with the Court and serve copies on Co-Lead Counsel, JPMorgan's Counsel, State Street's Counsel, UniCredit's Counsel, and Natixis's Counsel by **November 13, 2023**. The Settlement Hearing is scheduled for **January 5, 2024 at 10:00 a.m.** *See* Questions 27 through 29.
APPEAR THROUGH AN ATTORNEY	You may enter an appearance through your own counsel at your own expense. *See* Question 29.

These rights and options and the deadlines to exercise them are explained in this Notice.

You are receiving this Notice because records indicate that you may be a Settlement Class Member in the Action because you may have purchased or sold one or more European Government Bond(s) in the United States directly from a Defendant, Deutsche Bank, or Rabobank during the Settlement Class Period.

If you are a brokerage firm or other person or entity who or which entered into European Government Bond transactions with a Defendant, Deutsche Bank, or Rabobank, or a Defendant's affiliate between January 1, 2005 and December 31, 2016 for the beneficial interest of persons or organizations other than yourself, the Court has directed that, WITHIN SEVEN (7) DAYS OF YOUR RECEIPT OF THIS NOTICE, you are to contact the Claims Administrator at the address above for further directions in providing the Notice to beneficial owners. You may either be asked to: (i) provide to the Claims Administrator the name and last known address of each person or organization that satisfies the Settlement Class definition for whom or which you made such European Government Bond transactions during the Settlement Class Period; or (ii) forward the Notice directly to beneficial owners of the European Government Bond transactions that fit the Settlement Class Definition. You may be reimbursed from the Settlement Funds for your reasonable out-of-pocket expenses in providing notice to beneficial owners upon request and submission of appropriate supporting documentation.

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BASIC INFORMATION

1. What Is a Class Action Lawsuit?

A class action is a lawsuit in which one or more representative plaintiffs (in this case, Ohio Carpenters' Pension Fund, Electrical Workers Pension Fund Local 103 I.B.E.W., and San Bernardino County Employees' Retirement Association (collectively, "Plaintiffs")) bring a lawsuit on behalf of themselves and other similarly situated persons (*i.e.*, a class) who have similar claims against the defendants. The representative plaintiffs, the court, and counsel appointed to represent the class all have a responsibility to make sure that the interests of all class members are adequately represented.

Importantly, class members are NOT individually responsible for attorneys' fees or litigation expenses. In a class action, attorneys' fees and litigation expenses are paid from the settlement fund (or the court-awarded judgment amount) and must be approved by the court. If there is no recovery on behalf of the class, the attorneys do not get paid.

When a representative plaintiff enters a settlement with a defendant on behalf of a class, such as the Settlements with JPMorgan, State Street, UniCredit, and Natixis, the court will require that the members of the class be given notice of the settlement and an opportunity to be heard with respect to the settlement. The court then conducts a hearing (called a Settlement Hearing) to determine, among other things, if the settlement is fair, reasonable, and adequate.

2. Why Did I Get This Notice?

You received this Notice because you requested it or records indicate that you may be a Settlement Class Member. As a potential Settlement Class Member, you have a right to know about the proposed Settlements with JPMorgan, State Street, UniCredit, and Natixis before the Court decides whether to approve the Settlements.

This Notice explains the Action, the Settlements, your legal rights, what benefits are available, who is eligible for them, and how you can seek to receive your portion of the benefits if you are eligible. The purpose of this Notice is also to inform you of the Settlement Hearing to be held by the Court to consider the fairness, reasonableness, and adequacy of the Settlements and Distribution Plan and to consider requests for awards of attorneys' fees, litigation expenses, and any service awards for Plaintiffs from the Settlement Fund.

3. What Is This Action About?

Plaintiffs allege that Defendants conspired to fix the prices of European Government Bonds in the primary and/or secondary markets. Plaintiffs allege that this conduct was carried out through several interrelated means.

In the primary market, Plaintiffs allege that Defendants furthered this conspiracy by agreeing to artificially inflate European Government Bond prices at auction through a process known as "overbidding" and to otherwise coordinate their bidding strategies, thereby outbidding rivals and raising the benchmark for resale in the secondary market. In the secondary market, Plaintiffs allege that Defendants, in control of the supply of newly issued European Government Bonds, agreed to fix bid-ask spreads. This includes, Plaintiffs allege, agreeing on higher prices to charge investors for European Government Bonds. Defendants are alleged to have coordinated this scheme via online chatroom communications, where they explicitly fixed prices and bids and exchanged other sensitive, confidential information necessary to carry out the scheme.

Plaintiffs allege they were injured by these artificially inflated prices and fixed bid-ask spreads each time they transacted in European Government Bonds directly with a Defendant (or Defendant affiliate) and therefore pursue claims under the Sherman Act for themselves and on behalf of the class.

4. What Has Happened in This Action?

Plaintiffs filed the Third Amended Consolidated Class Action Complaint on December 3, 2019. ECF No. 87. On February 27, 2020, Defendants moved to dismiss the Third Amended Class Action Complaint for failure to state a claim and lack of personal jurisdiction. ECF No. 110. Following an exchange of letter briefs, on July 23, 2020, the Court issued a Decision and Order granting in part and denying in part the motion to dismiss. ECF No. 115. On August 6, 2020, certain Defendants filed a motion for reconsideration of the Court's July 23, 2020 Decision and Order (ECF No. 119), which the Court denied on December 11, 2020. ECF No. 139.

On February 9, 2021, Plaintiffs filed the Fourth Amended Consolidated Class Action Complaint, naming additional Defendants. ECF No. 146. Defendants moved to dismiss the Fourth Amended Consolidated Class Action Complaint on April 16, 2021. *See* Appendices to ECF No. 206. On March 14, 2022, the Court issued a Decision and Order granting in

part and denying in part the motion to dismiss. ECF No. 236. On March 28, 2022, certain Defendants filed motions for reconsideration of the Court's March 14, 2022 Decision and Order (ECF No. 238), which the Court denied on June 16, 2022. ECF No. 270.

On December 9, 2022, Plaintiffs filed a class action complaint in *Ohio Carpenters' Pension Fund, et al. v. Deutsche Bank AG, et al.*, No. 1:22-cv-10462-VM (S.D.N.Y.) against Deutsche Bank and Rabobank. Complaint, *Ohio Carpenters' Pension Fund v. Deutsche Bank AG*, No. 1:22-cv-10462-VM (S.D.N.Y. Dec. 9, 2022), ECF No. 1.

The Court granted Plaintiffs' motions for preliminary approval of the Settlements with State Street and JPMorgan on June 16, 2021 and May 2, 2022, respectively. ECF Nos. 212, 258. The Court granted Plaintiffs' motion for preliminary of the Settlements with UniCredit and Natixis on May 16, 2023, and preliminarily approved amended settlements with UniCredit and Natixis on July 12, 2023.

The Action is proceeding against the non-settling Defendants.

5. Why Are There Settlements?

Plaintiffs and Co-Lead Counsel believe that Settlement Class Members were damaged by Defendants' conduct. JPMorgan, State Street, UniCredit, and Natixis do not agree with the allegations made by Plaintiffs, believe that they have meritorious defenses to Plaintiffs' allegations, and believe that certain of Plaintiffs' claims would have been rejected prior to trial, at trial, or on appeal. The Court has not decided in favor of either Plaintiffs, JPMorgan, State Street, UniCredit, or Natixis. Instead, Co-Lead Counsel engaged in separate settlement discussions with JPMorgan, State Street, UniCredit, and Natixis to reach negotiated resolutions of the Action. The Settlements allow both sides to avoid the risks and costs of lengthy litigation and the uncertainty of pre-trial proceedings, a trial, and appeals, and, if approved, they would permit eligible Settlement Class Members who or which submit valid claims to receive some compensation, rather than risk ultimately receiving nothing. Plaintiffs and Co-Lead Counsel believe the Settlements are in the best interest of all Settlement Class Members.

JPMorgan has agreed to pay a total of $13 million in cash for the benefit of the proposed JPMorgan and State Street Settlement Class (defined below) and to provide Cooperation Materials in connection with Plaintiffs' continued prosecution of claims against the non-settling Defendants.

State Street has agreed to provide Cooperation Materials in connection with Plaintiffs' continued prosecution of claims against the remaining Defendants.

UniCredit has agreed to pay a total of $13 million in cash for the benefit of the proposed UniCredit and Natixis Settlement Class (defined below) and to provide Cooperation Materials in connection with Plaintiffs' continued prosecution of claims against the non-settling Defendants and against the defendants in EGB II.

Natixis has agreed to pay a total of $14 million in cash for the benefit of the proposed UniCredit and Natixis Settlement Class (defined below) and to provide Cooperation Materials in connection with Plaintiffs' continued prosecution of claims against the non-settling Defendants and against the defendants in EGB II.

If the JPMorgan, UniCredit, and Natixis Settlements are approved, the Settlement Fund, plus interest earned from the date it was established, less any Taxes, any Notice and Administration Costs, any Court-awarded attorneys' fees and litigation expenses, service awards for Plaintiffs, and any other costs or fees approved by the Court (the "Net Settlement Fund") will be divided among all Settlement Class Members who submit valid Claim Forms.

The Stipulations preserve the Settlement Class's right to recover the entire amount of damages against non-settling Defendants based on joint and several liability (after an offset post-trebling for the Settlement Amount). JPMorgan, State Street, UniCredit, and Natixis do not think that Plaintiffs would have prevailed at trial (had they successfully certified a class and survived summary judgment motions), and JPMorgan, State Street, UniCredit, and Natixis believe, as a result, Settlement Class Members would have received nothing.

If the Settlements are approved, JPMorgan, State Street, UniCredit, and Natixis will no longer be defendants in the Action, but the Action will continue against the non-settling Defendants. If the Settlements are not approved, JPMorgan, State Street, UniCredit, and Natixis will remain as defendants in the Action, and Plaintiffs will continue to pursue their claims against JPMorgan, State Street, UniCredit, Natixis, and non-settling Defendants.

6. How Do the Settlements Affect the Claims Against the Non-Settling Defendants?

Plaintiffs' claims against non-settling Defendants will continue to be litigated and prepared for trial, whether or not the Settlements are approved. If damages are awarded against the non-settling Defendants, they may seek to reduce that damages award by the amount of the Settlements; any reduction would not affect Settlement Class Members' recovery under the Settlements. The Court's findings in any approval of the Settlements and certification of the Settlement Class will have no effect on the Court's rulings on future motions involving the non-settling Defendants, including any motion to certify any other class in the Action.

WHO GETS MONEY FROM THE SETTLEMENTS

7. How Do I Know if I Am a Settlement Class Member?

In the Preliminary Approval Orders, the Court preliminarily approved the following Settlement Class for the JPMorgan and State Street Settlements:

> All persons or entities who or which purchased or sold one or more European Government Bond(s) in the United States directly from a Defendant or a direct or indirect parent, subsidiary, affiliate, or division of a Defendant, or any of their alleged co-conspirators, from January 1, 2007 through December 31, 2012.

In separate Preliminary Approval Orders, the Court preliminarily approved the following Settlement Class for the UniCredit and Natixis Settlements:

> All persons or entities who or which purchased or sold one or more European Government Bond(s) in the United States directly from a Defendant, Deutsche Bank, or Rabobank, or a direct or indirect parent, subsidiary, affiliate, or division of a Defendant, Deutsche Bank, or Rabobank, or any of their alleged co-conspirators, from January 1, 2005 through December 31, 2016.

Not everyone who fits this description will be a Settlement Class Member. Please see Question 8 for a discussion of exclusions from the Settlement Class.

8. Are There Exceptions to Being Included in the Settlement Class?

Yes. You are not included in the Settlement Class if you are a Defendant, a direct or indirect parent, subsidiary, affiliate, or division of a Defendant, or Defendants' alleged co-conspirators. In addition, all federal government entities and any judicial officer presiding over this Action and the members of his or her immediate family and judicial staff and any juror assigned to this Action are excluded from the Settlement Class.

9. I Am Still Not Sure if I Am Included.

If you are still not sure whether you are included, you can ask for free help. You can call toll-free 1-877-883-7336 or visit www.EuropeanGovernmentBondsSettlement.com for more information. Or you can submit a Claim Form to see if you qualify.

THE SETTLEMENTS BENEFITS

10. What Do the Settlements Provide?

JPMorgan paid $13 million into a fund to be held for disbursement to the Settlement Class and to pay for Court- approved fees and expenses, if the JPMorgan Settlement is approved.

UniCredit paid $13 million into a fund to be held for disbursement to the Settlement Class and to pay for Court- approved fees and expenses, if the UniCredit Settlement is approved.

Natixis paid $14 million into a fund to be held for disbursement to the Settlement Class and to pay for Court- approved fees and expenses, if the Natixis Settlement is approved.

JPMorgan, State Street, UniCredit, and Natixis have also agreed to provide cooperation for the benefit of Plaintiffs and Settlement Class Members, including but not limited to the production of documents, transaction data, an attorney proffer,

and/or witness interviews. Co-Lead Counsel believe the Cooperation Materials have and will continue to aid the continued prosecution of the Action against the non-settling Defendants.

11. How Will I Get a Payment?

If you are a Settlement Class Member and do not exclude yourself, you are eligible to submit a claim to receive your share of money from the Net Settlement Fund. A Claim Form is attached to this Notice. You may also obtain a Claim Form by visiting www.EuropeanGovernmentBondsSettlement.com or by contacting the Claims Administrator toll-free at 1-877-883-7336.

Claimants must electronically submit their Claim Forms online at www.EuropeanGovernmentBondsSettlement.com by **11:59 p.m. Eastern Time on November 28, 2023 OR** mail the Claim Forms **such that they are received no later than November 28, 2023** by the Claims Administrator at European Government Bonds Settlement, c/o A.B. Data, Ltd., P.O. Box 173119, Milwaukee, WI 53217.

Read the instructions carefully, fill out and sign the Claim Form, include all requested documents, and submit all materials on the Settlement Website at www.EuropeanGovernmentBondsSettlement.com.

Following receipt of your Claim Form, the Claims Administrator will send you a "Confirmation of Claim Receipt," which will acknowledge receipt of your claim and will inform you of important next steps.

If you have already submitted a Claim Form after receiving the prior notice, you may want to submit another one. The UniCredit and Natixis Settlement Class includes European Government Bond transactions with Defendants, in addition to Deutsche Bank and Rabobank, from January 1, 2005 through December 31, 2016.

Please keep all data and documentation related to your eligible European Government Bond transactions. Having data and documentation may be important to substantiating your claim.

If you do not submit a Claim Form, you will not receive any payments under the Settlements.

12. How Much Will My Payment Be?

At this time, it is not known precisely how much each Authorized Claimant will receive from the Net Settlement Fund or when payments will be made. The amount of your payment will be determined by the Distribution Plan, if it is approved or by such other plan of distribution that is approved by the Court. For more information on the Distribution Plan, *see* Question 13.

13. What Is the Distribution Plan?

The Distribution Plan is available for review on the Settlement Website. The Multiplier Table referred to in the Distribution Plan is posted on the Settlement Website. Changes, if any, to the Multiplier Table based on newly available data or information will be promptly posted on the Settlement Website. Please check the Settlement Website for the most up-to-date information about the Distribution Plan.

14. When Will I Receive a Payment?

The Court will hold the Settlement Hearing on January 5, 2024 at 10:00 a.m. to decide whether to approve the Settlements and Distribution Plan. If the Court approves the Settlements and Distribution Plan, there may be appeals after that. It can sometimes take a year or more for the appellate process to conclude.

Please be patient and continue to check status updates at www.EuropeanGovernmentBondsSettlement.com.

15. What Do I Have to Do After I Submit a Claim Form?

After you submit a claim, the Claims Administrator will evaluate your Claim Form to determine if you have provided sufficient information to validate your membership in the Settlement Class and calculate your payment. If the Claims Administrator determines that your Claim is deficient or defective, it will contact you. If you subsequently provide information that satisfies the Claims Administrator concerning the validity of your claim, you will not have to do anything else. If any disputes cannot be resolved, Co-Lead Counsel will submit them to the Court, and the Court will make a final determination of the validity of your claim. The decision of the Court with respect to objections to the Claims Administrator's claim determinations shall be final and binding, and there shall be no appeal to any court.

Please keep all data and documentation related to your eligible European Government Bond transactions. Having data and documentation may be important to substantiating your claim.

16. What Am I Giving Up to Receive a Payment?

Unless you exclude yourself, you remain a Settlement Class Member. That means you cannot sue, continue to sue, or be part of any other lawsuit about the Settled Claims in this Action against JPMorgan, State Street, UniCredit, or Natixis.

Upon the Effective Date of the Settlements, Plaintiffs and all Settlement Class Members shall be deemed to have, and by operation of the Judgments shall have, fully, finally, and forever waived, released, relinquished, and discharged all Settled Claims against the Settling Defendants, regardless of whether such Settlement Class Member executes and delivers a Claim Form. The capitalized terms used in this paragraph are defined in the Stipulations, Preliminary Approval Orders, or this Notice. For easy reference, certain of these terms are copied below:

- "Released Parties" in the JPMorgan Stipulation means JPMorgan, together with its respective past and present, direct and indirect corporate parents (including holding companies), subsidiaries, related entities, affiliates, associates (all as defined in SEC Rule 12b-2 promulgated pursuant to the Securities Exchange Act of 1934), divisions, joint ventures, predecessors, successors, and each of their respective past or present officers, directors, partners, managing directors, employees, agents, contractors, attorneys, legal, or other representatives, trustees, trusts, heirs, beneficiaries, estates, executors, administrators, insurers, shareholders, advisors, and assigns.
- "Released Parties" in the State Street Stipulation means State Street, together with its respective past and present, direct and indirect corporate parents (including holding companies), subsidiaries, related entities, affiliates, associates (all as defined in SEC Rule 12b-2 promulgated pursuant to the Securities Exchange Act of 1934), divisions, joint ventures, predecessors, successors, and each of their respective past or present officers, directors, partners, managing directors, employees, agents, contractors, attorneys, legal, or other representatives, trustees, trusts, heirs, beneficiaries, estates, executors, administrators, insurers, shareholders, advisors, and assigns.
- "Released Parties" in the UniCredit Stipulation means UniCredit, together with its respective past and present, direct and indirect corporate parents (including holding companies), subsidiaries, related entities, affiliates, associates (all as defined in SEC Rule 12b-2 promulgated pursuant to the Securities Exchange Act of 1934), divisions, joint ventures, predecessors, successors, and each of their respective past or present officers, directors, partners, managing directors, employees, agents, contractors, attorneys, legal, or other representatives, trustees, trusts, heirs, beneficiaries, estates, executors, administrators, insurers, shareholders, advisors, and assigns. For the avoidance of doubt, Released Parties include UniCredit Capital Markets LLC and UniCredit S.p.A., as well as their subsidiaries, related entities, affiliates, associates (all as defined in SEC Rule 12b-2 promulgated pursuant to the Securities Exchange Act of 1934), divisions, joint ventures, predecessors, successors, and each of their respective past or present officers, directors, partners, managing directors, employees, agents, contractors, attorneys, legal, or other representatives, trustees, trusts, heirs, beneficiaries, estates, executors, administrators, insurers, shareholders, advisors, and assigns.
- "Released Parties" in the Natixis Stipulation means Natixis, together with its respective past and present, direct and indirect corporate parents (including holding companies), subsidiaries, related entities, affiliates, associates (all as defined in SEC Rule 12b-2 promulgated pursuant to the Securities Exchange Act of 1934), divisions, joint ventures, predecessors, successors, and each of their respective past or present officers, directors, partners, managing directors, employees, agents, contractors, attorneys, legal, or other representatives, trustees, trusts, heirs, beneficiaries, estates, executors, administrators, insurers, shareholders, advisors, and assigns.
- "Settling Plaintiff Parties" in all Stipulations means individually and collectively each Plaintiff and Settlement Class Member, on behalf of himself, herself, or itself, and each of his, her, or its respective past and present, direct and indirect corporate parents (including holding companies), subsidiaries, related entities, affiliates, associates (all as defined in SEC Rule 12b-2 promulgated pursuant to the Securities Exchange Act of 1934), divisions, joint ventures, predecessors, successors, and each of their respective past and present officers, directors, partners, managing directors, employees, agents, contractors, attorneys, legal, or other representatives, trustees, trusts, heirs, beneficiaries, estates, executors, administrators, insurers, shareholders, advisors, and assigns, whether or not they object to the Settlement and whether or not they make a claim for payment from the Settlement Fund.

- "Settled Claims" in the State Street and JPMorgan Stipulations means any and all manner of claims, including Unknown Claims, causes of action, cross-claims, counter-claims, charges, liabilities, demands, judgments, suits, obligations, debts, setoffs, rights of recovery, or liabilities for any obligations of any kind whatsoever (however denominated), whether class or individual, in law or equity or arising under constitution, statute, regulation, ordinance, contract, or otherwise in nature, for fees, costs, penalties, fines, debts, expenses, attorneys' fees, and damages, whenever incurred, and liabilities of any nature whatsoever (including joint and several, treble, or punitive damages), known or unknown, suspected or unsuspected, asserted or unasserted, choate or inchoate, which the Settling Plaintiff Parties ever had, now have, or hereafter can, shall, or may have, individually, representatively, derivatively, or in any capacity against JPMorgan or State Street that arise from or relate in any way to the conduct alleged in the Action, or conduct that could have been alleged in the Action based on the factual predicate of the Action, including any amended complaint or pleading therein. Settled Claims shall not include: (i) claims based on transactions that are outside the extraterritorial reach of the Sherman Act pursuant to Section 6a of the Sherman Act, 15 U.S.C. §6a; (ii) any claims relating to the enforcement of the Settlement; or (iii) any claims of any person or entity that submits a request for exclusion in connection with the Notice and whose request is accepted by the Court.
- "Settled Claims" in the UniCredit and Natixis Stipulations means any and all manner of claims, including Unknown Claims, causes of action, cross-claims, counter-claims, charges, liabilities, demands, judgments, suits, obligations, debts, setoffs, rights of recovery, or liabilities for any obligations of any kind whatsoever (however denominated), whether class or individual, in law or equity or arising under constitution, statute, regulation, ordinance, contract, or otherwise in nature, for fees, costs, penalties, fines, debts, expenses, attorneys' fees, and damages, whenever incurred, and liabilities of any nature whatsoever (including joint and several, treble, or punitive damages), known or unknown, suspected or unsuspected, asserted or unasserted, choate or inchoate, which the Settling Plaintiff Parties ever had, now have, or hereafter can, shall, or may have, individually, representatively, derivatively, or in any capacity against UniCredit or Natixis and any other Released Parties that arise from or relate in any way to the conduct alleged in the Action, or conduct that could have been alleged in the Action based on the factual predicate of the Action, including any amended complaint or pleading therein. Settled Claims include without limitation claims relating to the period January 1, 2005 through December 31, 2016 and any claims that could have been asserted against UniCredit or Natixis in EGB II. Settled Claims shall not include: (i) claims based on transactions that are outside the extraterritorial reach of the Sherman Act pursuant to Section 6a of the Sherman Act, 15 U.S.C. §6a; (ii) any claims relating to the enforcement of the Settlement; or (iii) any claims of any person or entity that submits a request for exclusion in connection with the Notice and whose request is accepted by the Court.

By remaining a Settlement Class Member, you do not give up any of your claims against the non-settling Defendants or in EGB II.

17. What if I Do Nothing?

You are automatically a member of a Settlement Class if you fit the Settlement Class description. However, if you do not timely submit a Claim Form, you will not receive any payment from the Settlements. You will be bound by past and any future Court rulings, including rulings on the Settlements and Releases. Unless you exclude yourself, you will not be able to start a lawsuit, continue with a lawsuit, or be a part of any other lawsuit against Settling Defendants or any of the other Released Parties based on the Settled Claims. Please see Question 16 for a description of the Settled Claims.

EXCLUDING YOURSELF FROM THE SETTLEMENTS

18. What if I Do Not Want to Be in the Settlement Class?

If you are a Settlement Class Member and do not want to remain in the Settlement Class as to one or both Settlements, then you must take steps to exclude yourself from one or both Settlements. This is also sometimes referred to as "opting out" of a class.

Because there are four separate proposed Settlements (the JPMorgan Settlement, State Street Settlement, UniCredit Settlement, and Natixis Settlement), you will need to decide, for each of the proposed Settlements, whether to exclude yourself from a Settlement, or whether to remain in the Settlement Class for all Settlements. If you exclude yourself from one or all of Settlements, you will be free to sue JPMorgan, State Street, UniCredit, and/or Natixis, depending on your opt-

out selection, on your own for the claims being resolved by the Settlement(s). However, you will not receive any money from the JPMorgan Settlement, UniCredit Settlement, and/or Natixis Settlement, and Co-Lead Counsel will no longer represent you with respect to any claims against JPMorgan, State Street, UniCredit, and/or Natixis, depending on your opt-out selection. Co-Lead Counsel will, however, continue to represent you in the continuing litigation against non-settling Defendants.

19. How Do I Exclude Myself?

You can exclude yourself by sending a written "Request for Exclusion." You cannot exclude yourself by telephone or email. Your written Request for Exclusion must be mailed such that it is received by November 13, 2023, to European Government Bonds Settlement, ATTN: EXCLUSIONS, c/o A.B. Data, Ltd., P.O. Box 173001, Milwaukee, WI 53217, and must include: (a) the name, address, and telephone number of the member of the Settlement Class; (b) a list of all trade names or business names that the member of the Settlement Class requests to be excluded; (c) the name of this Action ("*In re European Government Bonds Antitrust Litigation*, No. 1:19-cv-02601 (S.D.N.Y.)"); (d) a statement certifying such person is a member of the Settlement Class; (e) documents sufficient to prove membership in the Settlement Class; (f) a statement that "I/we hereby request that I/we be excluded from the Settlement Class as it relates to the JPMorgan, State Street, UniCredit, [and/or] Natixis Settlements," as applicable; and (g) the signature of the person or entity requesting the exclusion or an authorized representative, as well as proof of authorization to submit the request for exclusion if submitted by an authorized representative.

A Request for Exclusion that does not include all the foregoing information, that does not contain the proper signature, that is sent to an address other than the one designated above, or that is not sent within the time specified shall be invalid and the person(s) filing such an invalid request shall be a Settlement Class Member and shall be bound by the Settlements, if approved.

All persons who submit valid and timely Requests for Exclusion in the manner set forth above shall have no rights under the Settlements, shall not share in the distribution of the Net Settlement Fund, and shall not be bound by the Settlements. Such persons will not be precluded from participating in future settlements, if any, or participating in any certified litigation classes in the Action in the future.

20. If I Do Not Exclude Myself, Can I Sue JPMorgan, State Street, UniCredit, and/or Natixis for the Same Thing Later?

No. Unless you exclude yourself, you give up any right to sue JPMorgan, State Street, UniCredit, and/or Natixis for the claims that the Settlements resolve. If you decide to exclude yourself, your decision will apply only to JPMorgan, State Street, UniCredit, and/or Natixis. It will not apply to any other class that might be certified by the Court with respect to the non-settling Defendants, or any other class that may be approved by the Court.

21. If I Exclude Myself, Can I Get Money from the Settlements?

You will not get any money from the JPMorgan Settlement, UniCredit Settlement, and/or Natixis Settlement if you exclude yourself.

22. If I Exclude Myself from the Settlements, Can I Still Object?

No. If you exclude yourself, you are no longer a Settlement Class Member and may not object to any aspect of the Settlements.

OBJECTING TO THE SETTLEMENTS

23. How Do I Tell the Court What I Think About the Settlements?

If you are a Settlement Class Member and you do not exclude yourself, you can tell the Court what you think about the Settlements. You can object to all or any part of the Settlements, Distribution Plan, and/or application for attorneys' fees and Litigation Expenses, and any service awards for Plaintiffs. You can give reasons why you think the Court should approve them or not. The Court will consider your views.

If you want to make an objection, you may enter an appearance in the Action, at your own expense, individually or through counsel of your own choice, by filing with the Clerk of Court a notice of appearance and your objection by November 13,

2023, and serving copies of your notice of appearance and objection on Co-Lead Counsel, JPMorgan's Counsel, State Street's Counsel, UniCredit's Counsel, and Natixis's Counsel at the following physical addresses:

Lowey Dannenberg, P.C. Attn: Vincent Briganti 44 South Broadway, Suite 1100 White Plains, NY 10601	Scott+Scott Attorneys at Law LLP Attn: Kristen M. Anderson 230 Park Avenue, 17th Floor New York, NY 10169
DiCello Levitt LLP Attn: Gregory S. Asciolla 485 Lexington Avenue, Suite 1001 New York, NY, 10017	Berman Tabacco Attn: Todd A. Seaver 425 California Street, Suite 2300 San Francisco, CA 94104
Co-Lead Counsel	
Covington & Burling LLP Attn: Robert D. Wick, Henry Liu One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956	Linklaters LLP Attn: Adam S. Lurie, Patrick C. Ashby 1290 Avenue of the Americas New York, NY 10104
JPMorgan's Counsel	**State Street's Counsel**
Skadden, Arps, Slate, Meagher & Flom LLP Attn: Boris Bershteyn One Manhattan West New York, New York 10001-8602	Milbank LLP Attn: Fiona A. Schaeffer 55 Hudson Yards New York, NY 10001-2163
UniCredit's Counsel	**Natixis's Counsel**

Any Settlement Class Member who does not enter an appearance will be represented by Co-Lead Counsel.

If you choose to object, you must file a written objection. You cannot make an objection by telephone or email. Your written objection must include: (a) a heading that refers to this Action by case name and case number; (b) a statement of the specific legal and factual basis for each objection, including whether the objection applies only to the objecting person, a specific subset of the Settlement Class or the entire Settlement Class; (c) the identity, address, and telephone number of all counsel representing the objector (if any); (d) a statement of whether the objecting or intervening person or entity intends to appear at the Settlement Hearing, either in person or through counsel; (e) a statement clarifying which Settlement(s) the objection applies to (*i.e.*, the JPMorgan Settlement, State Street Settlement, UniCredit Settlement, Natixis Settlement, or all Settlements); (f) a description of any and all evidence the objecting person or entity may offer at the Settlement Hearing, including but not limited to the names, addresses, and expected testimony of any witnesses and exhibits intended to be introduced at the Settlement Hearing; (g) documents sufficient to prove membership in the Settlement Class; and (h) a list of other cases in which the objector or intervenor or counsel for the objector or intervenor has appeared either as an objector or counsel for an objector in the last five years.

If you do not timely and validly submit your objection, your views may not be considered by the Court or any court on appeal.

24. What Is the Difference Between Objecting and Excluding Myself?

Objecting is telling the Court that you do not like something about the Settlements. You can object to the Settlements only if you remain a Settlement Class Member and do not exclude yourself from the Settlements. Excluding yourself from the Settlements is telling the Court that you do not want to be a part of the Settlement Class. If you exclude yourself, you have no right to object to the Settlements because they no longer affect you.

THE LAWYERS REPRESENTING YOU

25. Do I Have a Lawyer in This Case?

The Court has appointed the lawyers listed below to represent you and the Settlement Class in this Action:

Vincent Briganti
Lowey Dannenberg, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601

Kristen M. Anderson
Scott+Scott Attorneys at Law LLP
230 Park Avenue, 17th Floor
New York, NY 10169

Gregory S. Asciolla
DiCello Levitt LLP
485 Lexington Avenue, Suite 1001
New York, NY, 10017

Todd A. Seaver
Berman Tabacco
425 California Street, Suite 2300
San Francisco, CA 94104

These lawyers are called Co-Lead Counsel. Co-Lead Counsel will apply to the Court for payment of attorneys' fees and Litigation Expenses from the Settlement Fund. You will not otherwise be charged for Co-Lead Counsel's services. If you want to be represented by your own lawyer, you may hire one at your own expense.

26. How Will the Lawyers Be Paid?

To date, Co-Lead Counsel have not been paid any attorneys' fees or reimbursed for any out-of-pocket Litigation Expenses. Any attorneys' fees and Litigation Expenses will be awarded only as approved by the Court in amounts determined to be fair and reasonable. The Settlements provide that Co-Lead Counsel may apply to the Court for an award of attorneys' fees and Litigation Expenses out of the Settlement Fund. Prior to the Settlement Hearing, Co-Lead Counsel will move for an award of up to 30% of the Settlement Fund (*i.e.*, up to $12,000,000) in attorneys' fees, plus payment of no more than $ 775,003.70 for Litigation Expenses, and for interest on such attorneys' fees and Litigation Expenses at the same rate as the earnings in the Settlement Fund, accruing from the inception of the Settlement Fund until the attorneys' fees and Litigation Expenses are paid.

The attorney fee application will be made collectively on behalf of Lowey Dannenberg, P.C., 44 S. Broadway, Ste. 1100, White Plains, NY 10601; Scott+Scott Attorneys at Law LLP, 230 Park Ave., 17th Fl., New York, NY 10169; DiCello Levitt LLC, 485 Lexington Ave., Ste. 1001, New York, NY 10017; and Berman Tabacco, 425 California St., Ste. 2300, San Francisco, CA 94101. In addition, DiCello Levitt has agreed to share its portion of the court-awarded attorneys' fees with Labaton Sucharow LLP (former Co-Lead Counsel), 140 Broadway, New York, NY 10005, and Thornton Law Firm LLP, One Lincoln St., Boston, MA 02111, both of which assisted in the litigation of the case. Payment to them will in no way increase the fees that are deducted from the Settlement Fund.

This is only a summary of the request for attorneys' fees and Litigation Expenses. Any motions in support of the requests will be available for viewing on the Settlement Website after they are filed no later than October 30, 2023. After that date, if you wish to review the motion papers, you may do so by viewing them at www.EuropeanGovernmentBondsSettlement.com.

The Court will consider the motion for attorneys' fees and Litigation Expenses at or after the Settlement Hearing.

THE COURT'S SETTLEMENT HEARING

27. When and Where Will the Court Decide Whether to Approve the Settlements?

The Court will hold the Settlement Hearing on January 5, 2024 at 10:00 a.m. at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., Courtroom 15B, New York, NY 10007. The Settlement Hearing may be moved to a different date or time without notice to you. Although you do not need to attend, if you plan to do so, you should check www.EuropeanGovernmentBondsSettlement.com before making travel plans.

At the Settlement Hearing, the Court will consider whether the Settlements are fair, reasonable, and adequate. The Court will also consider whether to approve the Distribution Plan and requests for attorneys' fees and litigation expenses, and any service awards for Plaintiffs. If there are any objections, the Court will consider them at this time. We do not know how long the Settlement Hearing will take or when the Court will make its decision. The Court's decision may be appealed.

28. Do I Have to Come to the Settlement Hearing?

No. Co-Lead Counsel will answer any questions the Court may have. You are, however, welcome to come at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you file and serve your written objection on time, the Court will consider it. You may also hire your own lawyer to attend, but you are not required to do so.

29. May I Speak at the Settlement Hearing?

You may ask the Court for permission to speak at the Settlement Hearing. If you want to appear at the Settlement Hearing, you may enter an appearance in the Action at your own expense, individually or through counsel of your own choice, by filing with the Clerk of Court a notice of appearance and your objection by November 13, 2023, and serving copies of your objection on Co-Lead Counsel, JPMorgan's Counsel, State Street's Counsel, UniCredit's Counsel, and Natixis's Counsel at the addresses set forth in Question 23. Any Settlement Class Member who does not enter an appearance will be represented by Co-Lead Counsel.

GETTING MORE INFORMATION

30. How Do I Get More Information?

This Notice summarizes the Settlement Agreements and Distribution Plan. More details are in the Settlement Agreements and Distribution Plan, which are available for your review at www.EuropeanGovernmentBondsSettlement.com. The Settlement Website also has answers to common questions about the Settlements, Claim Form, and other information to help you determine whether you are a Settlement Class Member and whether you are eligible for a payment. You may also call toll-free 1-877-883-7336 or write to the Claims Administrator at:

European Government Bonds Settlement
c/o A.B. Data, Ltd.
P.O. Box 173119
Milwaukee, WI 53217
Email: info@EuropeanGovernmentBondsSettlement.com

*******Please do not contact the Court or the Clerk's Office regarding this Notice or for additional information.*******

DATED: September 5, 2023 BY ORDER OF THE COURT

This Form Must Be Electronically Submitted OR Received by Mail No Later than November 28, 2023.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE EUROPEAN GOVERNMENT BONDS ANTITRUST LITIGATION

Lead Case No. 1:19-cv-2601

PROOF OF CLAIM AND RELEASE

I. INSTRUCTIONS

1. If you entered into a European Government Bond transaction from January 1, 2007 through and including December 31, 2012 ("JPMorgan Settlement Class Period"), you may be eligible to receive a payment from the $13 million settlement with JPMorgan Chase Bank, N.A., J.P. Morgan Securities PLC (f/k/a J.P. Morgan Securities Ltd.), and J.P. Morgan Securities LLC (f/k/a J.P. Morgan Securities Inc.) together with their affiliates and subsidiaries (collectively, "JPMorgan") reached in *In re European Government Bonds Antitrust Litigation*, No. 1:19-cv-2601 (S.D.N.Y), and if you entered into European Government Bond transaction from January 1, 2005 through and including December 31, 2016 ("UniCredit and Natixis Settlement Class Period"), you may be eligible to receive a payment from the $13 million settlement with UniCredit Bank AG together with its affiliates and subsidiaries (collectively, "UniCredit") and the $14 million settlement with Natixis S.A. together with its affiliates and subsidiaries (collectively, "Natixis").

2. "European Government Bond" 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).

3. Unless otherwise defined herein, all capitalized terms contained in this proof of claim and release ("Claim Form") have the same meaning as defined in the accompanying Notice of Pendency of Class Action Hearing on Proposed Settlements and Attorneys' Fee Petition, and Right to Share in Net Settlement Fund ("Notice"), the Stipulation and Agreement of Settlement with JPMorgan, the Stipulation and Agreement of Settlement with State Street Corporation and State Street Bank and Trust Company, the Stipulation and Agreement of Settlement with UniCredit Bank AG, and the Stipulation and Agreement of Settlement with Natixis S.A. (collectively, "Settlement Agreements"), which are available at www.EuropeanGovernmentBondsSettlement.com.

4. It is important that you read the Notice that accompanies this Claim Form. By signing and submitting this Claim Form, you will be certifying that you have read the Notice, including the terms of the Releases described in the Notice and provided for in the Settlement Agreements.

5. To be eligible to receive a payment from the Net Settlement Fund, you must submit a Claim Form along with the required data and/or information described in Parts III and IV below. **To be considered timely, your Claim Form must be submitted online at www.EuropeanGovernmentBondsSettlement.com by 11:59 p.m. Eastern Time on November 28, 2023 OR received by mail no later than November 28, 2023**. If you are unable to submit the required data as described below at Parts III and IV, you should call the Claims Administrator for further instructions.

6. As described in Part III below, you may be required to submit additional information about the European Government Bond transactions that you submit as part of your Claim Form, but only if you are contacted and instructed to do so by the Claims Administrator.

7. Your payment amount will be determined based on the Claims Administrator's review of your Claim Form and calculated pursuant to the Distribution Plan. Submission of a Claim Form does not guarantee that you will receive a payment from the Net Settlement Fund. For more information, please refer to the Notice and Distribution Plan available at www.EuropeanGovernmentBondsSettlement.com.

8. Separate Claim Forms must be submitted for each separate legal entity. Correspondingly, a single Claim Form should be submitted on behalf of only one legal entity.

This Form Must Be Electronically Submitted OR Received by Mail No Later than November 28, 2023.

9. If you previously filed a Claim Form for this Action, you may want to submit an additional Claim Form to seek relief for transactions not previously covered by the JPMorgan Settlement Class. The UniCredit and Natixis Settlement Class includes European Government Bond transactions with Defendants, in addition to Deutsche Bank and Rabobank, from January 1, 2005 through December 31, 2016.

10. If you have questions about submitting a Claim Form or need additional copies of the Claim Form or the Notice, you may contact the Claims Administrator.

This Form Must Be Electronically Submitted OR Received by Mail No Later than November 28, 2023.

II. CLAIMANT IDENTIFICATION

The Claims Administrator will use this information to verify eligibility and for all communications relevant to this Claim Form. If this information changes, please notify the Claims Administrator in writing. If you are a trustee, executor, administrator, custodian, or other nominee and are completing and signing this Claim Form on behalf of the Claimant, you must attach documentation showing your authority to act on behalf of Claimant.

Section A – Claimant Information

Claimant's First Name | MI | Claimant's Last Name

Co-Claimant's First Name | MI | Co-Claimant's Last Name

Entity Name (if Claimant is not an individual)

Representative or Custodian Name (if different from Claimant[s] listed above)

Address 1 (street name and number)

Address 2 (apartment, unit, or box number)

City | State | ZIP Code/Postal Code

Province/Region (if outside U.S.)

Country

Claimant Tax ID (For most U.S. Claimants, this is their individual Social Security number, employer identification number, or taxpayer identification number. For non-U.S. Claimants, enter a comparable government-issued identification number.)

Telephone Number (home or cell) – –

Telephone Number (work) – –

Email Address (If you provide an email address, you authorize the Claims Administrator to use it in providing you with information relevant to this claim.)

Location(s) from which Claimant entered into European Government Bond transactions:

☐ U.S. or its territories ☐ Other (please specify): _____

For Brokers filing this Claim Form for its own account(s): Have you included European Government Bond transactions in which you acted as an agent?

☐ Yes ☐ No

This Form Must Be Electronically Submitted OR Received by Mail No Later than November 28, 2023.

Section B – Authorized Representative Information

Name of the person you would like the Claims Administrator to contact regarding this claim (if different from the Claimant name listed above)

First Name

MI

Last Name

Telephone Number (home or cell)

– –

Telephone Number (work)

– –

Address 1 (street name and number)

Address 2 (apartment, unit, or box number)

City

State

ZIP Code/Postal Code

Province/Region (if outside U.S.)

Email Address (If you provide an email address, you authorize the Claims Administrator to use it in providing you with information relevant to this claim.)

This Form Must Be Electronically Submitted OR Received by Mail No Later than November 28, 2023.

III. REQUIREMENTS FOR CLAIM SUBMISSION

1. YOU MUST SUBMIT YOUR CLAIM FORM ELECTRONICALLY OR ON PAPER IN THE REQUIRED FORMAT

Claimants must electronically submit their Claim Forms online at www.EuropeanGovernmentBondsSettlement.com by **11:59 p.m. Eastern Time on November 28, 2023 OR** mail the Claim Forms **such that they are received no later than November 28, 2023** by the Claims Administrator at European Government Bonds Settlement, c/o A.B. Data, Ltd., P.O. Box 173119, Milwaukee, WI 53217.

Instructions related to Claim submissions ("Claim Submission Instructions"), including the information you must provide about your European Government Bond transactions, are available at www.EuropeanGovernmentBondsSettlement.com. Claim Forms must be submitted in the format specified by the Claim Submission Instructions.

Along with your Claim Form, you may be later required to submit the details of your European Government Bond transactions reflected in the Summary Price Table in Part IV, below.

2. YOU DO NOT NEED TO SUBMIT ANY ADDITIONAL DATA OR DOCUMENTATION OF TRANSACTIONS AT THIS TIME BUT MUST DO SO IF CONTACTED BY THE CLAIMS ADMINISTRATOR.

The Claims Administrator may request that Claimants submit additional data or documentation of their European Government Bond transactions. The EGB Transaction Data Template, including the information you must provide about your European Government Bond transactions, if requested, is available at www.EuropeanGovernmentBondsSettlement.com.

If supplemental documentation is required, it must be from one or more of the following sources:

a. Transaction data from your bank, broker, or internal trade system;

b. Bank confirmations by individual trade;

c. Bank transaction reports or statements;

d. Trading venue transaction reports or statements;

e. Prime broker reports or statements;

f. Custodian reports or statements;

g. Daily or monthly account statements or position reports;

h. Email confirmations from counterparty evidencing transactions;

i. Bloomberg confirmations or communications evidencing transactions; and/or

j. Other documents evidencing European Government Bond transactions during the Class Period.

Claimants are advised to retain such documentation and information, as it may be required to substantiate a Claim Form.

Further information about these requirements is included in the Claim Submission Instructions, which are available at www.EuropeanGovernmentBondsSettlement.com.

This Form Must Be Electronically Submitted OR Received by Mail No Later than November 28, 2023.

IV. SUMMARY PRICE TABLE OF EUROPEAN GOVERNMENT BOND TRANSACTIONS

Complete this Part IV if and only if you entered into European Government Bond transactions from January 1, 2005 through and including December 31, 2016. Do not include information regarding instruments other than European Government Bond transactions with a Defendant, Deutsche Bank, or Rabobank (or a direct or indirect parent, subsidiary, affiliate, or division of a Defendant, Deutsche Bank, or Rabobank or any of their alleged co-conspirators), and do not include European Government Bond transactions in which you acquired the bonds as an agent for another individual or entity. For detailed instructions on how to fill out this table, please refer to the Claim Submission Instructions, which is available at www.EuropeanGovernmentBondsSettlement.com.

Date of Transaction	Transaction Type (Purchase/Sale)	Name of Counterparty	Notional Amount (Expressed in Euros)	Maturity Date
/ /				
/ /				
/ /				
/ /				
/ /				
/ /				

V. CLAIMANT'S CERTIFICATION & SIGNATURE

SECTION A: CERTIFICATION

BY SIGNING AND SUBMITTING THIS CLAIM FORM, CLAIMANT OR CLAIMANT'S AUTHORIZED REPRESENTATIVE CERTIFIES ON CLAIMANT'S BEHALF AS FOLLOWS:

1. I (we) have read the Notice and Claim Form, including the descriptions of the Releases provided for in the Settlement Agreements;

2. I (we) am (are) a Settlement Class Member and am (are) not one of the individuals or entities excluded from the Settlement Class;

3. I (we) have not submitted a Request for Exclusion;

4. I (we) have made the transactions submitted with this Claim Form for myself (ourselves) and not as agents of another, and have not assigned my (our) Settled Claims to another;

5. I (we) hereby warrant and represent that I (we) have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any matter released pursuant to the release or any other part or portion thereof;

6. I (we) have not submitted any other claim in this Action covering the same transactions (other than a Claim Form to seek relief for transactions in the JPMorgan Settlement Class) and know of no other person having done so on his/her/its/their behalf;

7. I (we) submit to the jurisdiction of the Court with respect to my (our) claim and for purposes of enforcing the Releases set forth in any Judgment(s) that may be entered in the Action;

This Form Must Be Electronically Submitted OR Received by Mail No Later than November 28, 2023.

8. I (we) agree to furnish such additional information with respect to this Claim Form as the Claims Administrator or the Court may require;

9. I (we) acknowledge that I (we) will be bound by and subject to the terms of the Judgments that will be entered in the Action if the Settlements are approved; and

10. I (we) understand that any trial by jury (to the extent any such right may exist) and any right of appeal or review of the Court's determination with respect to my (our Claim) are waived.

SECTION B: SIGNATURE

PLEASE READ THE RELEASE, CONSENT TO DISCLOSURE AND CERTIFICATION, AND SIGN BELOW.

I (we) acknowledge that, as of the Effective Date of the Settlements, pursuant to the terms set forth in the Settlement Agreements, and by operation of law and the Judgments, I (we) shall be deemed to release and forever discharge and shall be forever enjoined from prosecuting the Settled Claims against the Released Parties (as defined in the Settlement Agreements and/or Judgment(s)).

If signing as an Authorized Representative on behalf of an entity, I (we) certify that I (we) have legal rights and authorization from the entity to file this Claim Form on the entity's behalf.

UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA, I (WE) CERTIFY THAT ALL THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE AND THAT THE DATA SUBMITTED IN CONNECTION WITH THIS CLAIM FORM ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.

_____ Date: _____
Signature of Claimant (if Claimant is an individual filing on his or her own behalf) MM/DD/YY

_____
Print Name of Claimant (if Claimant is an individual filing on his or her own behalf)

_____ Date: _____
Authorized Representative Completing Claim Form (if any) MM/DD/YY

_____
Print name of Authorized Representative Completing Claim Form (if any)

_____
Capacity of Authorized Representative (if other than an individual (*e.g.*, trustee, executor, administrator, custodian, or other nominee))

This Form Must Be Electronically Submitted OR Received by Mail No Later than November 28, 2023.

REMINDER: YOUR CLAIM FORM AND REQUIRED DATA MUST BE SUBMITTED ONLINE BY 11:59 P.M. EASTERN TIME ON NOVEMBER 28, 2023 OR RECEIVED BY MAIL NO LATER THAN NOVEMBER 28, 2023.

EXHIBIT B

Lowey Dannenberg, P.C., Scott+Scott Attorneys at Law LLP, DiCello Levitt LLP and Berman Tabacco Announce Notice of Proposed Settlements in European Government Bond Class Action

NEWS PROVIDED BY
Lowey Dannenberg, P.C., Scott+Scott Attorneys At Law LLP, DiCello Levitt LLP and Berman Tabacco →
05 Sep, 2023, 10:00 ET

NEW YORK, Sept. 5, 2023 /PRNewswire/ --

SUMMARY NOTICE OF PROPOSED CLASS ACTION SETTLEMENTS

If you entered into a European Government Bond Transaction from January 1, 2005 through and including December 31, 2016 ("Class Period"), your rights may be affected by pending class action settlements and you may be entitled to a portion of the settlement fund.

This notice is to alert you to **new and additional** proposed settlements reached with UniCredit and Natixis in *In re European Government Bonds Antitrust Litigation*, No. 1:19-cv-2601 (VM) (S.D.N.Y.) and the creation of an additional settlement fund totaling $27,000,000. Together with the prior settlements with JPMorgan and State Street (collectively with UniCredit and Natixis, the "Settling Defendants"), the settlement fund total is $40,000,000. UniCredit and Natixis also agreed to provide cooperation in connection with Plaintiffs' continued prosecution of claims against the non-settling Defendants. The settlements with UniCredit and Natixis will

resolve all claims that were or could have been asserted against them in the action (as detailed in the respective settlements). UniCredit and Natixis deny any liability, fault, or wrongdoing. Litigation remains ongoing against the non-settling Defendants.

The capitalized terms in these paragraphs, as well as other capitalized terms, are explained or defined below or in the (i) Stipulation and Agreement of Settlement with JPMorgan Chase Bank, N.A., J.P. Morgan Securities PLC (f/k/a J.P. Morgan Securities Ltd.), and J.P. Morgan Securities LLC (f/k/a J.P. Morgan Securities Inc.); (ii) Stipulation and Agreement of Settlement with State Street Corporation and State Street Bank and Trust Company; (iii) Amended Stipulation and Agreement of Settlement with UniCredit Bank AG; and/or (iv) Amended Stipulation and Agreement of Settlement with Natixis S.A.

The United States District Court for the Southern District of New York (the "Court") authorized this notice. The Court appointed the lawyers listed below to represent the Settlement Class:

Vincent Briganti LOWEY DANNENBERG, P.C. 44 S. Broadway, Suite 1100 White Plains, NY 10601	Kristen M. Anderson SCOTT+SCOTT ATTORNEYS AT LAW LLP 230 Park Avenue, 17th Floor New York, NY 10169
Gregory S. Asciolla DICELLO LEVITT LLP 485 Lexington Avenue, Suite 1001 New York, NY 10017	Todd A. Seaver BERMAN TABACCO 425 California Street, Suite 2300 San Francisco, CA 94104

Who Is a Member of the Settlement Class?

Subject to certain exceptions, the Settlement Class consists of all persons that purchased or sold one or more European Government Bond(s) in the United States directly from a Defendant, Deutsche Bank, or Rabobank (or a direct or indirect parent, subsidiary, affiliate, or division of a Defendant, Deutsche Bank, or Rabobank, or any of their alleged co-conspirators) from January 1, 2005 through December 31, 2016.

"European Government Bonds" 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).

If you are not sure if you are included in the Settlement Class, you can get more information, by visiting www.EuropeanGovernmentBondsSettlement.com or by calling toll-free 1-877-883-7336.

What Is This Lawsuit About?

Plaintiffs allege that Defendants, including UniCredit, Natixis, JPMorgan, and State Street, conspired to fix the prices of European Government Bonds in the primary and/or secondary markets.

In the primary market, Plaintiffs allege that Defendants furthered this conspiracy by agreeing to artificially inflate European Government Bond prices at auction through a process known as "overbidding" and to otherwise coordinate their bidding strategies, thereby outbidding rivals and raising the benchmark for resale in the secondary market.

In the secondary market, Plaintiffs allege that Defendants, in control of the supply of newly issued European Government Bonds, agreed to fix bid-ask spreads. This includes, Plaintiffs allege, agreeing on higher prices to charge investors for European Government Bonds. Defendants are alleged to have coordinated this scheme via online chatroom communications, where they explicitly fixed prices and bids and exchanged other sensitive, confidential information necessary to carry out the scheme.

Plaintiffs allege they were injured by these artificially inflated prices and fixed bid-ask spreads each time they transacted in European Government Bonds directly with a Defendant (or Defendant affiliate) and therefore pursue claims under the Sherman Act for themselves and on behalf of the class.

What Do the Settlements Provide?

To settle the claims against them (as detailed in the respective settlements), JPMorgan agreed to pay a total of $13,000,000, UniCredit agreed to pay a total of $13,000,000, and Natixis agreed to pay a total of $14,000,000. Settling Defendants also agreed to provide cooperation in connection with Plaintiffs' continued prosecution of claims against the non-settling Defendants. If the Settlements are approved, the Settlement Amount, plus interest earned and less any Taxes, Notice and Administration Costs, Court-awarded attorneys' fees and Litigation Expenses, any service awards for Plaintiffs, and any other expenses approved by the Court will be divided among all Settlement Class Members who submit valid claim forms. More information about the specific terms of the settlements can be found by visiting www.EuropeanGovernmentBondsSettlement.com or by calling toll-free 1-877-883-7336.

Will I Get a Payment?

If you are a member of the Settlement Class and do not opt out, you will be eligible for a payment under the settlements if you file a valid claim form. Claim forms must be submitted online at www.EuropeanGovernmentBondsSettlement.com on or before 11:59 p.m. Eastern time on **November 28, 2023 OR** mailed so that they are received by **November 28, 2023**.

What Are My Rights?

If you are a member of the Settlement Class and do not opt out, you will release certain legal rights against Settling Defendants and the other Released Parties, as explained in the Court's detailed notice and the Settlement agreements, which are available at www.EuropeanGovernmentBondsSettlement.com. If you do not want to be a member of the Settlement Class with respect to these Settlements, you must opt out by **November 13, 2023**. You may object to these settlements, the Distribution Plan, application for an award of attorneys' fees and Litigation Expenses, and/or service awards for Plaintiffs by **November 13, 2023**. Information on how to opt out or object is contained in the Court's detailed notice, which is available at www.EuropeanGovernmentBondsSettlement.com.

When Is the Settlement Hearing?

The Court will hold a Settlement Hearing at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., Courtroom 15B, New York, NY 10007, on **January 5, 2024** at **10:00 a.m.** to consider whether to finally approve the settlements, Distribution Plan, application for an award of attorneys' fees and Litigation Expenses, and any service awards for Plaintiffs. You or your lawyer may ask to appear and speak at the hearing at your own expense, but you do not have to.

For more information, call toll-free 1-877-883-7336 or visit www.EuropeanGovernmentBondsSettlement.com.

****** *Please do not call the Court or the Clerk of the Court for information about the settlements.* ******

SOURCE Lowey Dannenberg, P.C., Scott+Scott Attorneys At Law LLP, DiCello Levitt LLP and Berman Tabacco

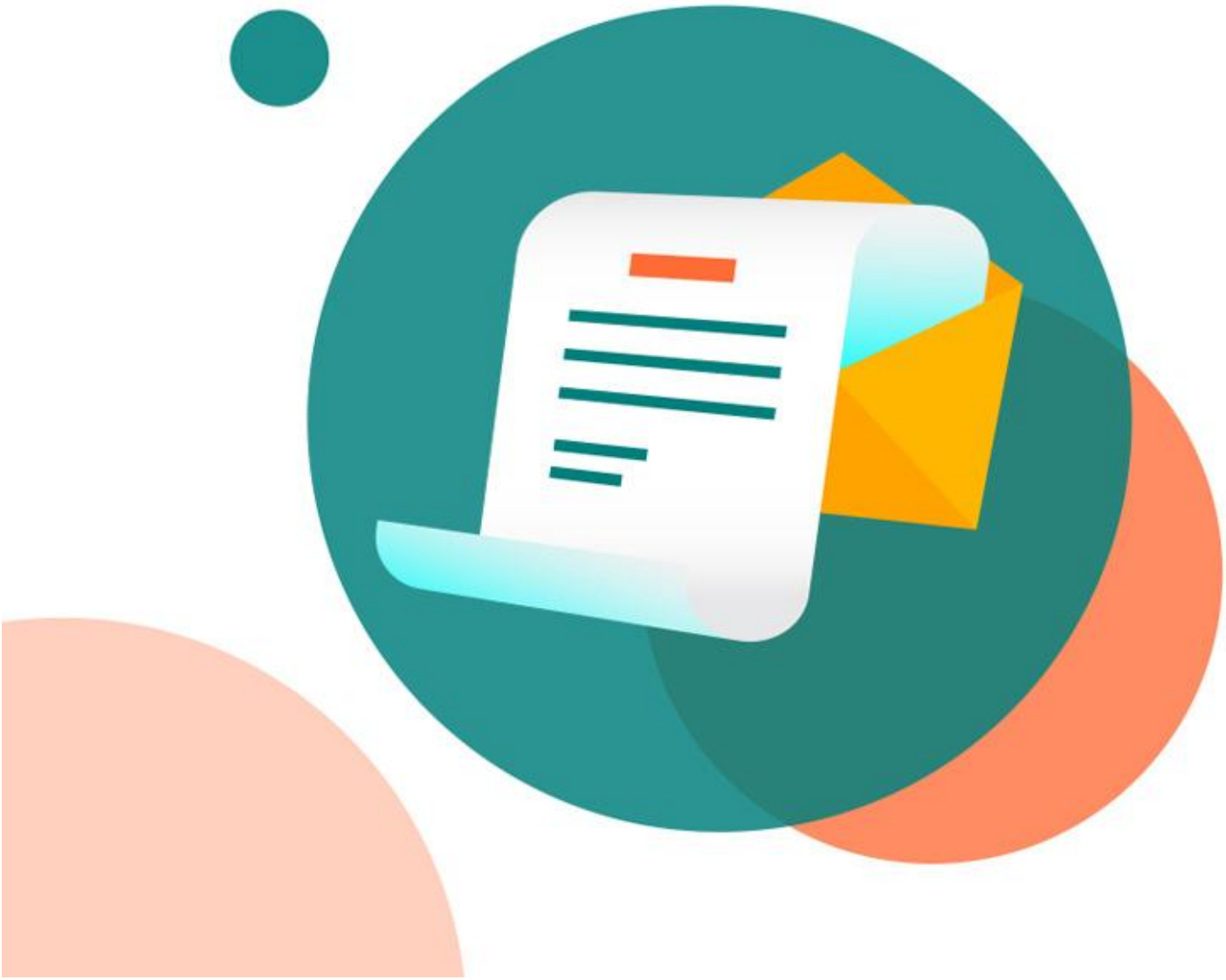

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EXHIBIT C

Beijing Moves to Ban Clothes That 'Hurt Feelings of Chinese People'

FROM FIRST BUSINESS PAGE

could give the authorities the power to police anything they dislike. It would be a big step backward in the public's relationship with the government.

"In Chinese history, the times when clothing and hairstyles were given significant attention often corresponded to 'bad moments in history,'" someone using the name Zhang Sanfeng wrote on the social media platform WeChat. "The introduction of the amendments didn't come from nothing. It's a response to some strange sentiments emerging in our society." The article was widely circulated before being purged by censors.

Under the rule of China's top leader, Xi Jinping, the government has been fixated on control — how people think, what they say online and now, what they wear.

China has built a surveillance state with modern technologies, censoring the news media and social media, even banning displays of tattoos and men wearing earrings on phone and TV screens. The ideological straitjacket is closing in on the private sphere. Personal sartorial choices are increasingly subject to the scrutiny of the police or overzealous pedestrians.

In July, an older man on a bus berated a young woman, on her way to a cosplay exposition — where people dress up as a characters from movies, books, TV shows and video games — for wearing a costume that could be considered Japanese style. A security guard at a shopping mall last month turned away a man who was dressed like a samurai. Last year, the police in the eastern city of Suzhou temporarily detained a woman for wearing a kimono.

These episodes were related to anti-Japanese sentiment instigated by the Chinese government. But the confrontations go beyond that.

Last month in Beijing, security guards cracking down on expressions of gay pride stopped people dressed in rainbow-themed clothes from entering a concert featuring the Taiwanese singer Zhang Huimei, better known as A-Mei. Also in August, people filed complaints about a concert by the Taiwanese singer Jolin Tsai because her fans displayed rainbow lights and some of the male fans dressed in what was described as "flamboyant" female clothing. Just last week the police in Shenzhen scolded a man who was livestreaming in a miniskirt. "A man wearing a skirt in public, do you think you're positive energy?!" the police yelled at the man.

XINMEI LIU

If the proposed amendments, which are open to public comment until Sept. 30, are approved by the national legislature, such incidents could result in fines of up to $680 and up to 15 days in police custody.

The law could put China in the ranks of the most socially conservative countries.

"The morality police is on the verge of coming out," a lawyer named Guo Hui wrote on Weibo. "Do you think you can still make fun of Iran and Afghanistan?" People posted photos last week of Iranian and Afghan women wearing miniskirts and other Western-style clothes in the 1970s, before their countries were taken over by autocratic religious rulers.

Many people are concerned that the proposal doesn't specify what would constitute an offense. The language it uses — clothing or symbols that are "detrimental to the spirit of the Chinese nation and hurt the feelings of the Chinese people" — tracks expressions the foreign ministry and official media use to voice their displeasure at Western countries and people. No one knows exactly what they mean.

I asked Ernie, the artificial intelligence chatbot released recently by China's biggest online search company, Baidu, to define "hurting the feelings of the Chinese people." Ernie said it didn't know the answer and urged me to move on to other topics.

Without a clear definition, enforcement of the law would be subject to the interpretation of individual officers.

"If officials can arbitrarily expand interpretations and applications of the law based on personal preferences and ideological beliefs," "we may not be far from the concept of 'if you want to accuse someone, you can always find a pretext,'" Zhao Hong, a professor at China University of Political Science and Law in Beijing, wrote in an article posted on the news site The Paper.

She quoted online comments from people worried that if wearing a kimono could be interpreted as harming the national spirit, then what about eating Japanese food, watching anime or studying the Japanese language? Other people noted that the ban could extend to wearing a suit and tie, or xizhuang in Chinese, which means clothes from the West.

It's hard not to think back to the time before the 1980s, when the Chinese used ration coupons to buy clothes, mostly in blue and gray. Fashion played an important part in liberalizing China's economy.

In 1979, when the French designer Pierre Cardin held the first fashion show in China after the Cultural Revolution, the contrast between the models in haute couture and the audiences wearing mostly dark-colored Mao suits reflected a jarring gap. There was an affluent, vibrant developed world, and there was an impoverished, oppressive China.

China had to change. First it had to allow people to wear what they liked.

"The length of one's hair, the size of one's pants cuffs and the morality of one's thoughts are not necessarily related," an official magazine wrote a few months after the fashion show.

Still, for much of the 1980s, fashion was a battlefield for the power struggle between the reformist leaders and the conservatives.

In 1983, the reformist party general secretary Hu Yaobang had to urge colleagues not to "interfere in people's clothing choices and to avoid using the term 'weird clothing.'"

Western-style fashion probably didn't take hold until 1987, when the new party chief, Zhao Ziyang, dressed in a double-breasted blue pinstripe suit, charmed the international press by chatting and answering dozens of unfiltered questions.

Both leaders were later purged but, as they envisioned, the closets of the Chinese people became fuller and more colorful. China became the world's leading fashion manufacturer and is now a major market for luxury goods.

The legislation is so unpopular that even some official media outlets are writing about the outcry.

Hu Xijin, the former editor of the official tabloid The Global Times, urged that the proposal be clarified. Many Chinese, he wrote, are worried about doing or saying the wrong things. The law should provide people with certainty and a sense of security, he wrote.

"China's development and prosperity," he wrote, "require an inclusive and relaxing social environment."

SUMMARY NOTICE OF PROPOSED CLASS ACTION SETTLEMENTS

If you entered into a European Government Bond Transaction from January 1, 2005 through and including December 31, 2016 ("Class Period"), your rights may be affected by pending class action settlements and you may be entitled to a portion of the settlement fund.

This notice is to alert you to **new and additional** proposed settlements reached with UniCredit and Natixis in *In re European Government Bonds Antitrust Litigation*, No. 1:19-cv-2601 (VM) (S.D.N.Y.) and the creation of an additional settlement fund totaling $27,000,000. Together with the prior settlements with JPMorgan and State Street (collectively with UniCredit and Natixis, the "Settling Defendants"), the settlement fund total is $40,000,000. UniCredit and Natixis also agreed to provide cooperation in connection with Plaintiffs' continued prosecution of claims against the non-settling Defendants. The settlements with UniCredit and Natixis will resolve all claims that were or could have been asserted against them in the action (as detailed in the respective settlements). UniCredit and Natixis deny any liability, fault, or wrongdoing. Litigation remains ongoing against the non-settling Defendants.

The capitalized terms in these paragraphs, as well as other capitalized terms, are explained or defined below or in the (i) Stipulation and Agreement of Settlement with JPMorgan Chase Bank, N.A., J.P. Morgan Securities PLC (f/k/a J.P. Morgan Securities Ltd.), and J.P. Morgan Securities LLC (f/k/a J.P. Morgan Securities Inc.); (ii) Stipulation and Agreement of Settlement with State Street Corporation and State Street Bank and Trust Company; (iii) Amended Stipulation and Agreement of Settlement with UniCredit Bank AG; and/or (iv) Amended Stipulation and Agreement of Settlement with Natixis S.A.

The United States District Court for the Southern District of New York (the "Court") authorized this notice. The Court appointed the lawyers listed below to represent the Settlement Class:

Vincent Briganti
LOWEY DANNENBERG, P.C.
44 S. Broadway, Suite 1100
White Plains, NY 10601

Kristen M. Anderson
SCOTT+SCOTT ATTORNEYS AT LAW LLP
230 Park Ave., 17th Floor
New York, NY 10169

Gregory S. Asciolla
DICELLO LEVITT LLP
485 Lexington Avenue, Suite 1001
New York, NY 10017

Todd A. Seaver
BERMAN TABACCO
425 California Street, Suite 2300
San Francisco, CA 94104

Who Is a Member of the Settlement Class?

Subject to certain exceptions, the Settlement Class consists of all persons that purchased or sold one or more European Government Bond(s) in the United States directly from a Defendant, Deutsche Bank, or Rabobank (or a direct or indirect parent, subsidiary, affiliate, or division of a Defendant, Deutsche Bank, or Rabobank, or any of their alleged co-conspirators) from January 1, 2005 through December 31, 2016.

"European Government Bonds" 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).

If you are not sure if you are included in the Settlement Class, you can get more information, by visiting www.EuropeanGovernmentBondsSettlement.com or by calling toll-free 1-877-883-7336.

What Is This Lawsuit About?

Plaintiffs allege that Defendants, including UniCredit, Natixis, JPMorgan, and State Street, conspired to fix the prices of European Government Bonds in the primary and/or secondary markets.

In the primary market, Plaintiffs allege that Defendants furthered this conspiracy by agreeing to artificially inflate European Government Bond prices at auction through a process known as "overbidding" and to otherwise coordinate their bidding strategies, thereby outbidding rivals and raising the benchmark for resale in the secondary market.

In the secondary market, Plaintiffs allege that Defendants, in control of the supply of newly issued European Government Bonds, agreed to fix bid-ask spreads. This includes, Plaintiffs allege, agreeing on higher prices to charge investors for European Government Bonds. Defendants are alleged to have coordinated this scheme via online chatroom communications, where they explicitly fixed prices and bids and exchanged other sensitive, confidential information necessary to carry out the scheme.

Plaintiffs allege they were injured by these artificially inflated prices and fixed bid-ask spreads each time they transacted in European Government Bonds directly with a Defendant (or Defendant affiliate) and therefore pursue claims under the Sherman Act for themselves and on behalf of the class.

What Do the Settlements Provide?

To settle the claims against them (as detailed in the respective settlements), JPMorgan agreed to pay a total of $13,000,000, UniCredit agreed to pay a total of $13,000,000, and Natixis agreed to pay a total of $14,000,000. Settling Defendants also agreed to provide cooperation in connection with Plaintiffs' continued prosecution of claims against the non-settling Defendants. If the Settlements are approved, the Settlement Amount, plus interest earned and less any Taxes, Notice and Administration Costs, Court-awarded attorneys' fees and Litigation Expenses, any service awards for Plaintiffs, and any other expenses approved by the Court will be divided among all Settlement Class Members who submit valid claim forms. More information about the specific terms of the settlements can be found by visiting www.EuropeanGovernmentBondsSettlement.com or by calling toll-free 1-877-883-7336.

Will I Get a Payment?

If you are a member of the Settlement Class and do not opt out, you will be eligible for a payment under the settlements if you file a valid claim form. Claim forms must be submitted online at www.EuropeanGovernmentBondsSettlement.com on or before 11:59 p.m. Eastern time on **November 28, 2023 OR** mailed so that they are received by **November 28, 2023**.

What Are My Rights?

If you are a member of the Settlement Class and do not opt out, you will release certain legal rights against Settling Defendants and the other Released Parties, as explained in the Court's detailed notice and the Settlement agreements, which are available at www.EuropeanGovernmentBondsSettlement.com. If you do not want to be a member of the Settlement Class with respect to these Settlements, you must opt out by **November 13, 2023**. You may object to these settlements, the Distribution Plan, application for an award of attorneys' fees and Litigation Expenses, and/or service awards for Plaintiffs by **November 13, 2023**. Information on how to opt out or object is contained in the Court's detailed notice, which is available at www.EuropeanGovernmentBondsSettlement.com.

When Is the Settlement Hearing?

The Court will hold a Settlement Hearing at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., Courtroom 15B, New York, NY 10007, on **January 5, 2024** at **10:00 a.m.** to consider whether to finally approve the settlements, Distribution Plan, application for an award of attorneys' fees and Litigation Expenses, and any service awards for Plaintiffs. You or your lawyer may ask to appear and speak at the hearing at your own expense, but you do not have to.

For more information, call toll-free 1-877-883-7336 or visit www.EuropeanGovernmentBondsSettlement.com.

****** *Please do not call the Court or the Clerk of the Court for information about the settlements.* ******

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re: PROTERRA INC, *et al.*,[1] Debtors.) Chapter 11, Case No. 23-11120 (BLS) (Jointly Administered) **Re: Docket No. 218**

NOTICE OF BIDDING PROCEDURES, AUCTION DATE, AND POTENTIAL SALES

PLEASE TAKE NOTICE that, on August 7, 2023, Proterra Inc and Proterra Operating Company, Inc. (collectively, the "Debtors" or the "Company") filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"), in the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that, on August 8, 2023, the Debtors filed the *Debtors' Motion for Entry of: (I) an Order (A) Approving Bidding Procedures to Govern the Sale of All Or Substantially All of the Debtors' Assets Pursuant to Section 363 of the Bankruptcy Code, (B) Approving Procedures Regarding Entry Into One or More Stalking Horse Agreements, (C) Establishing Procedures for the Assumption and Assignment of Executory Contracts and Unexpired Leases, (D) Approving the Form and Manner of the Notice of Assumption and Assignment of Executory Contracts and Unexpired Leases, (E) Scheduling Auctions for the Sales of the Company Assets and Hearings to Consider Approval of the Sales and Approving the Form and Manner of the Notice Thereof, (F) Approving Certain Wind-Down Procedures, and (G) Granting Related Relief; and (II) an Order (A) Authorizing and Approving the Debtors' Entry Into One or More Asset Purchase Agreements, (B) Authorizing the Sale of All or Substantially All of the Debtors' Assets Free and Clear of Liens, (C) Approving the Assumption and Assignment of the Assumed Executory Contracts and Unexpired Leases, and (D) Granting Related Relief* (Docket No. 36] (the "Motion").

PLEASE TAKE FURTHER NOTICE that, on September 7, 2023, the Court entered that certain *Order (A) Approving Bidding Procedures to Govern the Sale of All Or Substantially All of the Debtors' Assets Pursuant to Section 363 of the Bankruptcy Code, (B) Approving Procedures Regarding Entry Into One or More Stalking Horse Agreements, (C) Establishing Procedures for the Assumption and Assignment of Executory Contracts and Unexpired Leases, (D) Approving the Form and Manner of the Notice of Assumption and Assignment of Executory Contracts and Unexpired Leases, (E) Scheduling Auctions for the Sales of the Company Assets and Hearings to Consider Approval of the Sales and Approving the Form and Manner of the Notice Thereof, and (F) Granting Related Relief* [Docket No. 218] (the "Bidding Procedures Order"),[2] which approved, among other things, (a) procedures pursuant to which the Debtors are authorized to solicit and pursue (such procedures, the "Bidding Procedures") one or more sales or dispositions of all or any portion of the Debtors' assets (the "Company Assets") under section 363 of the Bankruptcy Code (each, an "Asset Sale") and any other type of strategic transaction involving the Debtors and/or the Company Assets, including, without limitation, a financing process for the potential raising of debt or equity financing through a chapter 11 plan of reorganization and/or a chapter 11 plan of reorganization proposed by the Cowen Parties, as holders of the Second Lien Convertible Notes, premised upon the preservation of the Debtors' net operating losses upon their emergence from these chapter 11 cases (any of the immediately foregoing, a "Recapitalization Transaction", and, any of the foregoing, including an Asset Sale, a "Potential Transaction"), (b) the scheduling of a hearing to approve (i) the Sale of the Track A Assets and (ii) the Sale of the Track B Assets, each free and clear of any liens, claims, and encumbrances under section 363 of the Bankruptcy Code, and (c) procedures in connection with the assumption and assignment of any executory contracts or unexpired leases the Debtors seek to have assumed and assigned in connection with a Potential Transaction. ***All interested bidders should carefully read the Bidding Procedures Order and the Bidding Procedures in their entirety.***

PLEASE TAKE FURTHER NOTICE the Bidding Procedures provide for the consideration of Qualified Bids (as defined therein) to acquire substantially all of the Company's assets or separate Bids to acquire portions of the Company Assets, to the extent that the consummation of such transactions maximizes value for stakeholders and can be accomplished efficiently.

PLEASE TAKE FURTHER NOTICE that all interested parties are invited to provide materials (as described in the Bidding Procedures) to apply to become a Potential Bidder (as defined in the Bidding Procedures) and submit a Bid in accordance with the Bidding Procedures and the Bidding Procedures Order. The Bidding Procedures provide information regarding the requirements for a Potential Bidder to be a "Qualified Bidder" and a bid to be a "Qualified Bid" for purposes of competing at an Auction (as defined below).

PLEASE TAKE FURTHER NOTICE that the deadline to submit a Qualified Bid for (i) the Track A Assets is **October 16, 2023 at 4:00 p.m. (prevailing Eastern Time)** (the "Track A Bid Deadline") and (ii) the Track B Assets is **November 6, 2023 at 4:00 p.m. (prevailing Eastern Time)** (the "Track B Bid Deadline" and, together with the Track A Bid Deadline, the "Bid Deadlines"). Pursuant to the Bidding Procedures Order, in the event that the Debtors timely receive one or more Qualified Bids other than one from the Stalking Horse Bidders, if any, the Debtors are authorized to conduct an auction (the "Auction") for the Track A Assets and the Track B Assets, respectively, in accordance with the Bidding Procedures Order. The Auctions, if held, will occur (i) for the Track A Assets, on **October 19, 2023 at 10:00 a.m. (prevailing Eastern Time)** and (ii), for the Track B Assets, on **November 9, 2023 at 10:00 a.m. (prevailing Eastern Time)** at the offices of Paul, Weiss, Rifkind, Wharton & Garrison LLP, New York, New York or such other location as shall be timely communicated to all entities entitled to attend each respective Auction. Only (a) Qualified Bidders (including the Stalking Horse Bidder, if any) and their legal and financial advisors, (b) the Consultation Parties, and (c) actual creditors of the Debtors (provided that they give at least three (3) business days' notice to the Debtors' counsel and the Committee's counsel of their intention to attend an Auction via email to Paul, Weiss, Rifkind, Wharton & Garrison LLP (Attn: Joshua A. Esses (jesses@paulweiss.com) and Vida Robinson (virobinson@paulweiss.com)) and (ii) Lowenstein Sandler LLP (Attn: Jeffrey Cohen (jcohen@lowenstein.com), Eric Chafetz (echafetz@lowenstein.com), Jordana Renert (jrenert@lowenstein.com), and Keara Waldron (kwaldron@lowenstein.com)), shall be entitled to attend an Auction. If an Auction is cancelled, the Debtors shall file a notice of cancellation of the Auction.

PLEASE TAKE FURTHER NOTICE that objections, if any, to any Sales (the "Sale Objections"), shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of Practice and Procedure for the United States Bankruptcy Court for the District of Delaware, shall set forth the name of the objecting party, the nature and amount of any claims or interests held or asserted against the Debtors' estate or properties, the basis for the objection, and the specific grounds therefore, and shall be filed and served upon the following so that such objections are received by **October 16, 2023 at 4:00 p.m. (prevailing Eastern Time)** (the "Sale Objection Deadline") by: (a) counsel for the Debtors, (i) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019 (Attn. Paul Basta (pbasta@paulweiss.com) and Robert Britton (rbritton@paulweiss.com)), and (ii) Young Conaway Stargatt & Taylor LLP, 1000 North Street, Wilmington, Delaware, 19801 (Attn: Pauline K. Morgan (pmorgan@ycst.com) and Andrew L. Magaziner (amagaziner@ycst.com)); (b) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Wilmington, Delaware, 19801 (Attn: Linda J. Casey (linda.casey@usdoj.gov)); (c) counsel for the Committee, (i) Lowenstein Sandler LLP (Attn: Jeffrey Cohen (jcohen@lowenstein.com), Eric Chafetz (echafetz@lowenstein.com), Jordana Renert (jrenert@lowenstein.com), and Keara Waldron (kwaldron@lowenstein.com)) and (ii) Morris James LLP (Attn: Eric Monzo (emonzo@morrisjames.com) and Brya Keilson (bkeilson@morrisjames.com)); and (d) the Notice Parties.

PLEASE TAKE FURTHER NOTICE that, for each Auction that is held, if any, the deadline to object only to (i) the conduct at the Auction or (ii) solely with respect to the Non-Debtor Counterparties to the Contracts, to the specific identity of and adequate assurance of future performance provided by the Successful Bidder (only if such Successful Bidder is not the Stalking Horse Bidder) (such a limited objection, a "Post-Auction Objection") is (a) the later of **October 27, 2023 at 4:00 p.m. (prevailing Eastern Time)** or within one day of the filing of the notice of the Successful Bidder with respect to the Track A Sale Hearing and (b) the later of **November 17, 2023 at 4:00 p.m. (prevailing Eastern Time)** or within one day of the filing of the notice of the Successful Bidder with respect to the Track B Sale Hearing (these deadlines, together, the "Post-Auction Objection Deadlines"). A Post-Auction Objection must be filed with this Court and served in the same manner as Sale Objections set forth above so to be actually received no later than the Post-Auction Objection Deadline.

PLEASE TAKE FURTHER NOTICE that failure of any entity to file an objection on or before the Sale Objection Deadline or applicable Post-Auction Objection Deadline shall be deemed to constitute consent to the sale of the Company Assets to the Successful Bidder and the other relief requested in the Motion, and be a bar to the assertion, at the applicable Sale Hearing or thereafter, of any objection to the Motion, the applicable Auction, the applicable Sale, or the Debtors' consummation and performance of the terms of the applicable Definitive Purchase Agreement.

PLEASE TAKE FURTHER NOTICE that the Bidding Procedures Order provides that a hearing to approve the Sale of (a) the Track A Assets to the Successful Bidder therefor shall take place on **November 1, 2023 at 10:00 a.m. (prevailing Eastern Time)**, and (b) the Track B Assets to the Successful Bidder therefor shall take place on **November 28, 2023 at 10:00 a.m. (prevailing Eastern Time)** (these hearings, together, the "Sale Hearings"). The Sale Hearings will be held before the Honorable Brendan L. Shannon, at the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 6th Floor, Wilmington, DE 19801.

For ease of reference, the following chart has been included to summarize key dates relevant to this notice:[3]

Deadline/Event	Proposed Dates/Deadlines	
	Track A Bids	Track B Bids
Service and Publication of Sale Notice	1 business day after entry of Bidding Procedures Order or as soon as reasonably practicable thereafter	
Debtors' Deadline to File a Proposed Form of Sale Order	Monday, September 25, 2023 @ 4:00 p.m. (ET)	
Debtors' Deadline to File and Serve Cure Notices	Monday, September 25, 2023	
Initial Indication of Interest ("IOI") Deadline	Tuesday, September 26, 2023 @ 4:00 p.m. (ET)	
Sale Objection Deadline	Monday, October 16, 2023 @ 4:00 p.m. (ET)	
Cure/Assignment Objection Deadline	Monday, October 16, 2023 @ 4:00 p.m. (ET)	
Qualified Bid Submission Deadline (can be extended at Debtors' discretion, in consultation with the Consultation Parties)	Monday, October 16, 2023 @ 4:00 p.m. (ET)	Monday, November 6, 2023 @ 4:00 p.m. (ET)
Determination of Qualified Bids	Wednesday, October 18, 2023	Wednesday, November 8, 2023
Auction (if necessary)	Thursday, October 19, 2023 @ 10:00 a.m. (ET)	Thursday, November 9, 2023 @ 10:00 a.m. (ET)
Identification of Successful Bidder and Backup Bidder, if any	Friday, October 20, 2023 (or as soon as reasonably practicable thereafter)	Friday, November 10, 2023 (or as soon as reasonably practicable thereafter)
Post-Auction Objection Deadline	The later of Friday, October 27, 2023 @ 4:00 p.m. (ET) or within one day of the filing of the notice of the Successful Bidder	The later of Friday, November 17, 2023 @ 4:00 p.m. (ET) or within one day of the filing of the notice of Successful Bidder
Deadline to File Replies in Connection with Sale	Monday, October 30, 2023 @ 10:00 a.m. (ET)	Wednesday, November 22, 2023 @ 10:00 a.m. (ET)
Sale Hearing	Wednesday, November 1, 2023 @ 10:00 am (ET)	Tuesday, November 28, 2023 @ 10:00 a.m. (ET)
Closing Date	As soon as reasonably practicable following entry of a Sale Order	As soon as reasonably practicable following entry of a Sale Order

PLEASE TAKE FURTHER NOTICE that this notice is subject to the full terms and conditions of the Motion, the Bidding Procedures Order, and the Bidding Procedures, and the Debtors urge parties in interest to review such documents in their entirety. Copies of the Motion, the Stalking Horse Agreements, if any, the Bidding Procedures, and the Bidding Procedures Order, in addition to any related documents that may be filed, may be obtained by accessing (a) the website of the Debtors' notice and claims agent, Kurtzman Carson Consultants LLC ("KCC"), at www.kcclc.net/proterra for no charge, or (b) the Court's internet site: https://ecf.deb.uscourts.gov, for a fee, through an account obtained from the PACER website at http://pacer.psc.uscourts.gov. The documents also may be obtained from the Debtors' claims and notice agent, KCC, at 888-251-3076 (USA or Canada) or 310-751-2617 (International).

CONSEQUENCES OF FAILING TO TIMELY FILE AND SERVE A SALE OBJECTION. ANY PARTY OR ENTITY THAT FAILS TO TIMELY FILE AND SERVE AN OBJECTION ON OR BEFORE THE SALE OBJECTION DEADLINE OR APPLICABLE POST-AUCTION OBJECTION DEADLINE, AS APPLICABLE, IN ACCORDANCE WITH THE BIDDING PROCEDURES ORDER SHALL BE FOREVER BARRED FROM ASSERTING ANY OBJECTION TO SUCH SALE, INCLUDING WITH RESPECT TO THE TRANSFER OF THE COMPANY ASSETS OF THE DEBTORS FREE AND CLEAR OF LIENS, CLAIMS, ENCUMBRANCES, AND OTHER INTERESTS AFFECTED THEREUNDER.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING. ANY CREDITOR THAT RECEIVES NOTICE OF A SALE HEARING AND FAILS TO TIMELY FILE AN OBJECTION TO THE SALE ON OR BEFORE THE APPLICABLE OBJECTION DEADLINE IN ACCORDANCE WITH THE BIDDING PROCEDURES ORDER SHALL BE DEEMED TO HAVE CONSENTED UNDER SECTION 363(F)(2) OF THE BANKRUPTCY CODE TO SUCH SALE FREE AND CLEAR OF SUCH CREDITOR'S LIEN, CLAIMS, ENCUMBRANCES, OR INTERESTS, IF ANY.

Dated: September 7, 2023, Wilmington, Delaware, Respectfully submitted, **YOUNG CONAWAY STARGATT & TAYLOR, LLP**, */s/ Shella Borovinskaya*, Pauline K. Morgan (No. 3650), Andrew L. Magaziner (No. 5426), Shella Borovinskaya (No. 6758), Rodney Square, 1000 North King Street, Wilmington, Delaware 19801, Telephone: (302) 571-6600, Facsimile: (302) 571-1253, Email: pmorgan@ycst.com, amagaziner@ycst.com, sborovinskaya@ycst.com -and- **PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP**, Paul M. Basta (admitted *pro hac vice*), Robert A. Britton (admitted *pro hac vice*), Michael J. Colarossi (admitted *pro hac vice*), 1285 Avenue of the Americas, New York, New York 10019, Tel: (212) 373-3000, Fax: (212) 757-3990, Email: pbasta@paulweiss.com, rbritton@paulweiss.com, mcolarossi@paulweiss.com, *Counsel to the Debtors and Debtors in Possession*

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Proterra Inc (1379); and Proterra Operating Company, Inc. (8459). The location of the Debtors' service address is: 1815 Rollins Road, Burlingame, California 94010.

[2] Capitalized terms used but not defined have the meanings ascribed to them in the Bidding Procedures Order.

[3] All dates, times, and deadlines are subject to change or modification in accordance with the Bidding Procedures Order.

EXHIBIT D

ZACKS
Our Research. Your Success.

If you bought or sold European Government Bonds between January 1, 2005 and December 31, 2016, your rights may be affected by pending class action settlements.
Learn More
EuropeanGovernmentBondsSettlement.com

Image: Bigstock

Zacks' 7 Best
Strong Buy Stocks for September, 2023

Our experts picked 7 Zacks Rank #1 Strong Buy stocks with the best chance to skyrocket within the next 30-90 days.

Recent stocks from this report have soared up to +178.7% in 3 months - this month's picks could be even better. See our report's 7 new picks today, absolutely FREE.

Enter your best email address

See Our 7 Strongest Buys Free

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3 Top-Ranked Short-Term Government Bonds for Steady Yield

Mutual funds investing in debt securities are among the most secure investment options, which provide regular income while protecting the capital invested. Funds that are part of this category bring a great deal of stability to one's portfolio with a large proportion of equity, while providing dividends more frequently than individual bonds.

U.S. government bond funds usually invest in Treasury bills, notes and securities issued by government agencies. They are considered the safest in the bond fund category and are ideal for risk-averse investors.

Meanwhile, a short-term government bond fund is a mutual fund that is limited by its investment objectives and fund bylaws to invest primarily in the short-term obligations of the federal gove[illegible]cies. Depending on the fund's definition, the short term can be up to five years.

Read More

EXHIBIT E

A.B. Data - Class Action Administration

458 followers

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If you entered into a European Government Bond Transaction from January 1, 2005 through and including December 31, 2016 ("Class Period"), your rights may be affected by pending class action settlements and you may be entitled to a portion of the settlement fund.

PROPOSED CLASS ACTION SETTLEMENTS

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EXHIBIT F

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Bought or Sold European Government Bonds? Your Rights May Be Affected by Pending Class Action Settlements.