

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

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

Plaintiffs,

-against-

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

Defendants.

Docket No. 15-cv-3538 (VSB)

**SUPPLEMENTAL DECLARATION OF JACK EWASHKO ON BEHALF OF A.B.  
DATA, LTD. REGARDING REPORT ON REQUESTS FOR EXCLUSION**

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”).<sup>1</sup> 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.

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<sup>1</sup> Unless otherwise noted, capitalized terms not defined herein have the same meaning as in the Notice of Proposed Class Action Settlement, November 16, 2023 Fairness Hearing Thereon, and Settlement Class Members’ Rights (the “Long-Form Notice”) (ECF No. 262-4) and the Stipulation and Agreement of Settlement between Representative Plaintiffs and Deutsche Bank dated March 31, 2022 (the “Settlement Agreement”). ECF No. 262-1.

2. I submit this Declaration to supplement my earlier declaration, the Declaration of Jack Ewashko on Behalf of A.B. Data, Ltd. Regarding Notice Administration, dated October 5, 2023 (ECF No. 277) (the “Initial Mailing Declaration”), which provided the Court with information regarding the implementation of the notice plan.

**TELEPHONE HELPLINE AND WEBSITE**

3. A.B. Data continues to maintain the toll-free telephone number (877-495-0835) and interactive voice response system to accommodate any inquiries from potential Class Members with questions about the Action and the Settlement.

4. A.B. Data also continues to maintain the Settlement Website ([www.SterlingLiborSettlement.com](http://www.SterlingLiborSettlement.com)) and an email address ([info@SterlingLiborSettlement.com](mailto:info@SterlingLiborSettlement.com)) to assist Class Members. The Settlement Website provides, among other things, the exclusion, objection, and claims-filing deadlines, the date and time of the Fairness Hearing, general information regarding the case and its current status, the Distribution Plan and instructions for submitting a claim, and answers to frequently asked questions. On October 6, 2023, A.B. Data posted to the website copies of the papers filed in support of Representative Plaintiffs’ motion for final approval of the Settlement and Plaintiffs’ Counsel’s motion for an award of attorneys’ fees and expenses.

5. A.B. Data will continue maintaining and, as appropriate, updating the website and toll-free telephone number until the conclusion of the administration.

**REPORT ON REQUESTS FOR EXCLUSION RECEIVED**

6. The Long-Form Notice informed potential Class Members that Requests for Exclusion from the Class were to be mailed to the Settlement Administrator by United States First-Class Mail (or, if sent from outside the U.S., by a service that provides for guaranteed delivery

within five (5) or fewer calendar days of mailing) and received no later than October 19, 2023. As of the date of this Declaration, A.B. Data received one (1) Request for Exclusion. Attached hereto as Exhibit A is a report regarding the Request for Exclusion. No additional Requests for Exclusion have been received as of the date of this Declaration.

**REPORT ON OBJECTIONS**

7. The Long-Form Notice also informed potential Class Members that objections to the fairness, reasonableness, or adequacy of any term or aspect of the Settlement, Motion for Award of Attorneys' Fees and Reimbursement of Expenses, or the Final Approval Order and Final Judgment and Order of Dismissal were required to be filed with the Court and served on Plaintiffs' Counsel and Deutsche Bank's counsel no later than October 19, 2023. As of the date of this Declaration, A.B. Data has not received any objections to the Settlement and knows of no other objections sent to Plaintiffs' Counsel or Deutsche Bank's counsel.

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

Executed this 26th day of October 2023.

  
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Jack Ewashko

# EXHIBIT A

***Sterling Libor  
Exclusion Report***

	<b>Name</b>	<b>Exclusion ID #</b>	<b>Received</b>	<b>Timely?</b>	<b>Contact Information?</b>	<b>Name of Action?</b>	<b>Class MemberStatement?</b>	<b>Exclusion Statement?</b>	<b>Docs?</b>	<b>Signed?</b>
1.	Michael Sinnemann	276008128	10/12/2023	Y	Y	Y	Y	Y	Y	Y
2.										
3.										
4.										
5.										
6.										
7.										
8.										