

4. On November 1, 2021, Class Counsel received account statements from Huntington Bank, the Court-approved escrow agent for these settlements, for the Barclays, Citibank, Deutsche Bank, and HSBC settlement funds, which reported that, as of October 31, 2021, the Barclays settlement fund contained \$99,122,777.83, the Citibank settlement fund contained \$96,791,439.08, the Deutsche Bank settlement fund contained \$198,239,587.96, and the HSBC settlement fund contained \$82,129,811.23.

5. None of the amounts previously approved by the Court for reimbursement for costs incurred by Rust and Bates White, *see* Dkt. 3300 ¶¶ 3-4, have yet been disbursed.

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

Dated: December 1, 2021

/s/ Geng Chen
Geng Chen

CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2021, I caused the foregoing document to be served via the Electronic Case Filing (ECF) system in the United States District Court for the Southern District of New York, on all parties registered for CM/ECF in the above-captioned matter.

Dated: December 1, 2021

/s/ Geng Chen
Geng Chen