

If You Owned a U.S. Dollar LIBOR-Based Instrument Between August 2007 and May 2010

Lawsuits and Settlements Totaling \$340 Million Could Affect You

There are lawsuits impacting individuals and institutions that entered into over-the-counter financial derivative and non-derivative instruments directly with 18 banks and that received payments tied to U.S. Dollar LIBOR. Settlements totaling \$340 million have been reached with Deutsche Bank Aktiengesellschaft and HSBC Bank plc. Earlier settlements were reached with Barclays and Citibank. The remaining 14 Non-Settling Defendants include: Bank of America, Bank of Tokyo-Mitsubishi, Citizens Bank, Credit Suisse, HBOS, JPMorgan Chase, Lloyds, Norinchukin, Rabobank, Royal Bank of Canada, Royal Bank of Scotland, SocGen, UBS, and WestLB.

A Litigation Class continues to assert claims against Bank of America, N.A. and JPMorgan Chase Bank, N.A. The lawyers for the Litigation Class will have to prove their claims in Court and a trial will be scheduled for a later date. The Litigation Class is seeking to recover money for its members.

What are the lawsuits about?

The litigation claims that the banks manipulated the U.S. Dollar LIBOR rate during the financial crisis, artificially lowering the rate for their own profit, which resulted in class members receiving lower interest payments for their U.S. Dollar LIBOR-based instruments from the banks than they should have. Plaintiffs assert antitrust, breach of contract, and unjust enrichment claims. Deutsche Bank, HSBC, Bank of America, and JPMorgan Chase deny all claims of wrongdoing.

Who is included in the lawsuits and Settlements?

There are two groups that are impacted by these lawsuits.

Litigation Class: You are included if you (individual or entity) reside in the U.S. and directly purchased certain U.S. Dollar LIBOR-based instruments (interest rate swaps or bond/floating rate notes) from Panel Banks (Deutsche Bank, HSBC, Barclays, Citibank, Bank of America, Bank of Tokyo-Mitsubishi, Credit Suisse, HBOS, JPMorgan Chase, Lloyds, Norinchukin, Rabobank, Royal Bank of Canada, Royal Bank of Scotland, SocGen, UBS, and WestLB), or any of their subsidiaries or affiliates; and pursuant to the instruments, a Panel Bank paid you interest indexed to a 1-month or 3-month U.S. Dollar LIBOR rate set at any time between August 2007 and August 2009. (This means you must have owned the instrument(s) between August 2007 and August 2009.)

Settlement Classes: You are included if you (individual or entity) directly purchased certain U.S. Dollar LIBOR-based instruments from Deutsche Bank, HSBC, Barclays, Citibank, Bank of America, Bank of Tokyo-Mitsubishi, Citizens Bank, Credit Suisse, HBOS, JPMorgan Chase, Lloyds, Norinchukin, Rabobank, Royal Bank of Canada, Royal Bank of Scotland, SocGen, UBS, or WestLB (or their subsidiaries or affiliates) in the United States; and owned the instruments at any time

between August 2007 and May 2010. The instruments in the Settlement Class include certain interest rate swaps, forward rate agreements, asset swaps, collateralized debt obligations, credit default swaps, inflation swaps, total return swaps, options, and bonds/floating rate notes.

What do the Settlements provide?

The Settlements will create Settlement Funds totaling \$340 million that will be used to pay eligible Class Members who submit valid claims. Additionally, Deutsche Bank and HSBC will cooperate with the Plaintiffs in their ongoing litigation against the Non-Settling Defendants.

How can I get a payment?

You can submit a Proof of Claim online or by mail. The deadline to submit a Proof of Claim is **December 20, 2018**. You are entitled to receive a payment if you have a qualifying transaction with Deutsche Bank, HSBC, Barclays, Citibank, Bank of America, Bank of Tokyo-Mitsubishi, Citizens Bank, Credit Suisse, HBOS, JPMorgan Chase, Lloyds, Norinchukin, Rabobank, Royal Bank of Canada, Royal Bank of Scotland, SocGen, UBS, and WestLB (or their subsidiaries or affiliates). At this time, it is unknown how much each Class Member who submits a valid claim will receive.

There is no money available now for the Litigation Class and no guarantee that there will be. If money or benefits are obtained in a future trial, you will be notified about how to ask for a share.

What are my rights?

If you are a member of the Settlement Classes and you do not file a timely claim, you will lose your right to receive money or benefits from the \$340 million in settlements with Deutsche Bank and HSBC. If you are a member of the Litigation Class and elect to opt out of the Litigation Class, you will not be eligible for any money or benefits obtained in a future trial against, or class settlements with, JPMorgan Chase or Bank of America, unless you timely file your own lawsuit. If you would like to retain your right to file your own lawsuit against Deutsche Bank, HSBC, JPMorgan Chase, or Bank of America, you must opt out of the appropriate Class by **September 28, 2018**. If you stay in the Settlement Classes, you may object to the Settlements by **September 28, 2018**.

The Court will hold a hearing on **October 25, 2018** to consider whether to approve the Settlements and approve Class Counsel's request of attorneys' fees of up to one-third of the Settlement Funds, plus reimbursement of costs and expenses. You or your own lawyer may appear and speak at the hearing at your own expense. More information is available about the Settlement Classes on the website, www.USDollarLiborSettlement.com, and in the Long Form Notice accessible on that website, or by calling 1-888-568-7640.