

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Laydon v. Mizuho Bank, Ltd., et al.

No. 12-cv-3419 (GBD)

Sonterra Capital Master Fund Ltd., et al. v. UBS AG, et al.

No. 15-cv-5844 (GBD)

**DECLARATION OF GEOFFREY M. HORN IN SUPPORT OF
CLASS COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES AND INCENTIVE AWARDS**

I, Geoffrey M. Horn, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I am a member in good standing of the State Bar of New York and a shareholder in the law firm of Lowey Dannenberg Cohen & Hart, P.C. (“Lowey”).

2. At all times relevant hereto, Lowey Dannenberg served as counsel for Plaintiffs and class representatives Jeffrey Laydon, Sonterra Capital Master Fund, Ltd., Hayman Capital Master Fund, L.P., Japan Macro Opportunities Master Fund, L.P., and California State Teachers’ Retirement System. This Court appointed Lowey as Interim Class Counsel for Plaintiffs and class representatives in these actions.

3. I respectfully submit this declaration in support of Class Counsel’s Motion for an Award of Attorneys’ Fees, Reimbursement of Expenses and an Incentive Award in connection with Lead Plaintiffs’ Settlement with Defendants Citibank, N.A., Citigroup Inc., Citibank Japan Ltd., Citigroup Global Markets Japan, Inc., HSBC Holdings plc and HSBC Bank plc.

4. The statements herein are true to the best of my personal knowledge, information and belief based on the books and records of Lowey and information received from Lowey Dannenberg attorneys and staff.

5. Set forth below are Lowey’s expenses reasonably incurred in connection with this litigation for which reimbursement is requested.

6. As detailed and categorized in the below schedule, Lowey has incurred a total of \$876,558.23 in expenses from inception through August 31, 2016, for which it is currently requesting reimbursement.

Expense Categories	Cumulative Expenses
Travel - Airfare, Lodging, Meals, Taxi	\$102,579.22
Computer Research, Databases & Docket	\$81,559.29
Conferences, Meetings, Telephone, & Telecopier	\$3,134.97
Acquisition of Court Transcripts/Court Reporter Fees	\$4,263.34
Document Review, IT and Maintenance	\$156,782.83
Professional, Consulting, or Expert Fees	\$436,549.76
In-House Copying	\$77,499.40
Outside Copying	\$2,439.22
Payroll-Overtime	\$186.46
Postage, Mailing, FedEx, UPS, Fares & Messengers	\$2,343.62
Publications, Library, Subscriptions, and Promotion	\$316.02
Service and Filing Fees	\$8,904.10
TOTAL	\$876,558.23

7. Lowey's compensation for services rendered in these actions was wholly contingent on the success of this litigation, and was totally at risk.

8. The above schedule was prepared based upon expense records reflected in the books and records of Lowey. These books and records are prepared from expense vouchers, check records, receipts and other source materials.

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

Executed on September 27, 2016

/s/ Geoffrey Horn

Geoffrey Horn