

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)

STATE OF WISCONSIN)
) ss.
MILWAUKEE COUNTY)

**AFFIDAVIT OF ERIC J. MILLER ON BEHALF OF A.B. DATA, LTD. REGARDING
REQUESTS FOR EXCLUSION**

I, Eric J. Miller, being duly sworn, certify as follows:

1. I am the Vice President of Client Services of A.B. Data, Ltd’s Class Action Administration Division (“A.B. Data”). I am over 21 years of age and am not a party to these Actions. My business address is 3507 Kyoto Gardens Drive, Suite 200, Palm Beach Gardens, FL 33410, and my telephone number is 561-336-1801. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. I submit this affidavit as a supplement to the Affidavit of Eric J. Miller on behalf of A.B. Data, Ltd. regarding Notice and Claims Administration, dated October 30, 2017, previously filed with this Court (*Laydon v. Mizuho Bank, Ltd., et al.*, No. 12-cv-3419, ECF No. 819; *Sonterra Capital Master Fund Ltd., et al. v. UBS AG, et al.*, No. 15-cv-5844, ECF No. 374) (the “Initial Mailing Affidavit”).

3. Pursuant to the Superseding Order Preliminarily Approving Proposed Settlements with Deutsche Bank AG, DB Services (UK) Ltd., JPMorgan Chase & Co., JPMorgan Chase Bank, National Association, and J.P. Morgan Securities plc, Scheduling Hearing for Final Approval Thereof, and Approving the Proposed Form and Program of Notice to the Class, entered on

September 14, 2017 (the “Superseding Order”), this Affidavit reports on the Opt-Out List¹ identifying all Persons who submitted a timely Request for Exclusion from the Settlement Class.

4. Pursuant to Paragraph 26 of the Superseding Order and Section III.C of the Mailed Notice, those members of the Settlement Class requesting exclusion were to provide the following information: (i) the name, address, and telephone number of the member of the Settlement Class; (ii) a list of all trade names or business names that the member of the Settlement Class requests to be excluded; (iii) the name of the Actions (“*Laydon v. Mizuho Bank, Ltd., et al.*, No. 12-cv-3419 (GBD) (S.D.N.Y.) and *Sonterra Capital Master Fund Ltd. et al. v. UBS AG et al.*, No. 15-cv-5844 (GBD) (S.D.N.Y.)”); (iv) a statement certifying such person is a member of the Settlement Class; (v) a description of the Euroyen-Based Derivatives transactions entered into by the member of the Settlement Class that fall within the Settlement Class definition (including, for each transaction, the identity of the broker, the date of the transaction, the type (including direction) of the transaction, the counterparty (if any), the exchange on which the transaction occurred (if any), any transaction identification numbers, the rate, and the notional amount of the transaction); (vi) a statement that “I/we hereby request that I/we be excluded from the Settlement Class in *Laydon v. Mizuho Bank, Ltd. et al.*, No. 12-cv-3419 (GBD) (S.D.N.Y.) and *Sonterra Capital Master Fund Ltd. et al. v. UBS AG et al.*, No. 15-cv-5844 (GBD) (S.D.N.Y.)”; and (vii) a statement specifying whether such person is requesting exclusion from the Settlement Class as it relates to the Deutsche Bank Settlement and/or the JPMorgan Settlement and/or both. All written requests must have been signed by the member of the Settlement Class (or his, her or its Legally Authorized Representative), notarized, and sent by First-Class mail to the Settlement Administrator postmarked no later than November 2, 2017.

¹ Unless otherwise defined herein, all capitalized terms used herein shall have the meanings set forth in the Superseding Order, the Notice, and/or the Settlement Agreements.

5. Pursuant to Paragraph 29 of the Superseding Order, A.B. Data promptly logged each Request for Exclusion that it received and provided copies of the log to Class Counsel, Deutsche Bank's counsel, and JPMorgan's counsel.

6. As reported in the Initial Mailing Affidavit, A.B. Data received three (3) requests for exclusion from the Settlement Class as of October 30, 2017. Since that date, A.B. Data has received two (2) additional requests for exclusion. Attached hereto as Exhibit A is a summary report of the five (5) exclusions from potential Settlement Class Members received as of the date of this Affidavit.

7. Pursuant to Paragraph 21 of the Superseding Order and Section III.B of the Mailed Notice, those members of the Settlement Class who wished to object to any aspect of the Settlements, application for attorneys' fees and expenses, or the Final Approval Order and Final Judgment were to file such objection with the Court and serve on Class Counsel and counsel of record for Deutsche Bank and JPMorgan no later than November 7, 2017.

8. As of the date of this Affidavit, A.B. Data has not received any objections to the Settlements and A.B. Data knows of no objections sent to Class Counsel and/or counsel for the Deutsche Bank Defendants or JPMorgan Defendants.

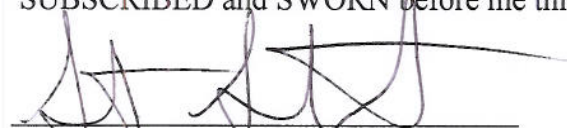
I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of November 2017.



Eric J. Miller

SUBSCRIBED and SWORN before me this 9th day of November 2017.



STEVEN STRAUB, Notary Public
My commission expires May 18, 2020.



EXHIBIT A

Euroyen Litigation
Exclusion Report

Name	Exclusion ID #	Postmark	Timely?	Contact information?	Name of Actions?	Statement that Class Member?	Transactions Statement?	Exclusion Statement?	Signed?	Notarized?
1. Akira Kusakawa	37941255	8/23/2017	Yes	Missing Phone Number	No	No	No	No	Yes	No
2. Larry K.L. Wong	37941256	9/27/2017	Yes	Yes	Yes	No	No	Yes	Yes	No
3. Raymond Wang	37941257	10/4/2017	Yes	Missing Phone Number	Yes	No	No	Yes	Yes	Yes
4. Eugene Choy	37941258	10/28/2017	Yes	Missing Phone Number	Yes	Yes	No	No	Yes	Yes
5. Commonwealth Bank of Australia	37941259	11/1/2017	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes