

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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

No. 12-cv-3419 (GBD)

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

No. 15-cv-5844 (GBD)

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**DECLARATION OF GEOFFREY M. HORN IN SUPPORT OF  
CLASS COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES**

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, P.C. (“Lowey”).

2. At all times relevant hereto, Lowey 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 Award of Attorneys’ Fees in connection with Lead Plaintiffs’ settlements with Defendants Deutsche Bank AG and DB Group Services (UK) Ltd. (collectively, “Deutsche Bank”) and JPMorgan Chase & Co., JPMorgan Chase Bank, National Association, and J.P. Morgan Securities plc (collectively, “JPMorgan,” and together with Deutsche Bank, the “Settling Defendants”).

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 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 \$194,360.69 in expenses from September 1, 2016 through September 30, 2017, for which it has been or will be reimbursed through the litigation fund created pursuant to the settlements with Citibank, N.A., Citigroup Inc., Citibank Japan Ltd., Citigroup Global Markets Japan Inc. (collectively, “Citi”) and HSBC Holdings plc, HSBC Bank plc (collectively, “HSBC”). *See Laydon v. Mizuho Bank, Ltd.*, No. 12-cv-3419 (GBD), ECF No. 724 ¶ 3. The cost of hosting and using Relativity, a sophisticated

document review platform, to manage and analyze Defendants' productions in discovery represents 68% of Lowey's expenses during this period.

| <b>Expense Categories</b>                            | <b>Cumulative Expenses</b> |
|--|----------------------------|
| Document Review, IT and Maintenance                  | \$132,658.56               |
| Computer Research, Databases & Docket                | \$11,108.73                |
| Professional, Consulting, or Expert Fees             | \$11,112.33                |
| In-House Copying                                     | \$16,826.20                |
| Travel - Airfare, Lodging, Meals, Taxi               | \$20,146.45                |
| Conferences, Meetings, Telephone, & Telecopier       | \$1,093.32                 |
| Acquisition of Court Transcripts/Court Reporter Fees | (\$302.21) <sup>1</sup>    |
| Outside Copying                                      | -                          |
| Payroll-Overtime                                     | -                          |
| Postage, Mailing, FedEx, UPS, Fares & Messengers     | \$344.14                   |
| Publications, Library, Subscriptions, and Promotion  | -                          |
| Service and Filing Fees                              | \$1,373.17                 |
| <b>TOTAL</b>   | <b>\$194,360.69</b>        |

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 October 31, 2017

/s/ Geoffrey Horn  
Geoffrey Horn

<sup>1</sup> This amount reflects the receipt of discounts or refunds applicable to this line item.