

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FUND LIQUIDATION HOLDINGS LLC, as assignee and successor-in-interest to SONTERRA CAPITAL MASTER FUND LTD., FRONTPOINT EUROPEAN FUND, L.P., FRONTPOINT FINANCIAL SERVICES FUND, L.P., FRONTPOINT HEALTHCARE FLAGSHIP ENHANCED FUND, L.P., FRONTPOINT HEALTHCARE FLAGSHIP FUND, L.P., FRONTPOINT HEALTHCARE HORIZONS FUND, L.P., FRONTPOINT FINANCIAL HORIZONS FUND, L.P., FRONTPOINT UTILITY AND ENERGY FUND L.P., HUNTER GLOBAL INVESTORS FUND I, L.P., HUNTER GLOBAL INVESTORS OFFSHORE FUND LTD., HUNTER GLOBAL INVESTORS SRI FUND LTD., HG HOLDINGS LTD., HG HOLDINGS II LTD., RICHARD DENNIS, and the CALIFORNIA STATE TEACHERS' RETIREMENT SYSTEM on behalf of themselves and all others similarly situated,

Plaintiffs,

- against -

CREDIT SUISSE GROUP AG, CREDIT SUISSE AG, JPMORGAN CHASE & CO., NATWEST MARKETS PLC, UBS AG, DEUTSCHE BANK AG, DB GROUP SERVICES UK LIMITED, TP ICAP PLC, TULLETT PREBON AMERICAS CORP., TULLETT PREBON (USA) INC., TULLETT PREBON FINANCIAL SERVICES LLC, TULLETT PREBON (EUROPE) LIMITED, COSMOREX AG, ICAP EUROPE LIMITED, ICAP SECURITIES USA LLC, NEX GROUP LIMITED, INTERCAPITAL CAPITAL MARKETS LLC, GOTTEX BROKERS SA, VELCOR SA AND JOHN DOE NOS. 1-50,

Defendants.

Docket No. 15-cv-00871
(SHS)

DECLARATION OF JESSIE MAHN REGARDING DISTRIBUTION PLAN

Jessie Mahn, being duly sworn declares and states:

1. I am a Senior Project Manager for Epiq Class Action & Claims Solutions, Inc. ("Epiq"). The following statements are based on my personal knowledge and information provided by other Epiq employees working under my supervision and, if called on to do so, I could and would testify competently thereto.

2. The Court appointed Epiq to serve as the Settlement Administrator in connection with the Settlements with the Settling Defendants¹ in the above-captioned class action (the “Action”).² ECF Nos. 426, 428, 429, 440, and 457.

3. On September 28, 2023, the Court finally approved the Settlements with the Settling Defendants except for NatWest, which Settlement was approved on October 24, 2023, and entered final judgments. ECF Nos. 500, 502, 506, 509-10, 514.

4. As Settlement Administrator, Epiq, among other things: (i) mailed the Court-approved Notice of Proposed Class Action Settlements, September 27, 2023 Fairness Hearing Thereon, and Class Members’ Rights (the “Notice”) and the Proof of Claim and Release (the “Claim Form”) (together with the Notice, the “Claim Packet”) to Class Members and their brokers and other nominees; (ii) maintained a toll-free helpline for inquiries during the course of the administration; (iii) created and maintained a case website that included, among other items, case-specific documents; (iv) caused the Summary Notice to be published; (v) provided, upon request, additional copies of the Claim Packet to Class Members, brokers and other nominees; and (vi) received and processed claims.

5. In accordance with the terms of the Settlements and the Court-approved Distribution Plan set forth in the Notice, Epiq has completed the processing of the 3,831 claims

¹ “Settling Defendants” are collectively JPMorgan Chase & Co. (“JPMorgan”); (2) NatWest Markets plc (f/k/a The Royal Bank of Scotland plc) (“NatWest”); (3) Deutsche Bank AG and DB Group Services (UK) Ltd. (collectively, “Deutsche Bank”); (4) Credit Suisse Group AG and Credit Suisse AG (collectively, “Credit Suisse”); (5) NEX Group plc, NEX International Limited (f/k/a ICAP plc), ICAP Capital Markets LLC (n/k/a Intercapital Capital Markets LLC), ICAP Securities USA LLC, and ICAP Europe Limited (collectively, “ICAP”); and (6) TP ICAP plc (f/k/a Tullett Prebon plc and n/k/a TP ICAP Finance plc), Tullett Prebon Americas Corp., Tullett Prebon (USA) Inc., Tullett Prebon Financial Services LLC, Tullett Prebon (Europe) Limited, and Cosmorex AG (together, “TP ICAP”), Gottex Brokers SA (“Gottex”), and Velcor SA (“Velcor” and, collectively with TP ICAP and Gottex, the “Settling Brokers”).

² Unless otherwise defined herein, all capitalized terms used have the meanings set forth and defined in the Stipulations and Agreements of Settlements (the “Settlement Agreements”). The Settlement Agreements are attached to the Declarations of Vincent Briganti in support of the motions for preliminary approval of the Settlements. *See* ECF Nos. 151-1, 384-1, 384-2, 391-1, 432-1, and 454-1.

received as of July 3, 2025, and hereby submits its administrative determinations accepting or rejecting the claims in preparation for a distribution of the Net Settlement Funds to Authorized Claimants.

PROCEDURES FOLLOWED IN PROCESSING CLAIMS

6. Under the provisions of the Preliminary Approval Orders and as set forth in the Notice, each Class Member who wished to be eligible to receive a distribution from the Net Settlement Funds was required to complete and submit to Epiq a properly executed Claim Form postmarked or received no later than October 27, 2023. Class Members (and their banks, brokers, and other nominees) were directed in the Claim Packet to submit their Claim Forms to the post office box address specifically designated for the Settlements, to submit claims online using the case website, or to submit claims to the Epiq team that handles large electronic claims (the “Securities Team”). Any correspondence received at the post office box was reviewed and, where necessary, appropriate responses were provided to the senders. Through July 3, 2025, Epiq has received 3,831 Claim Forms. All have been fully processed.

7. In preparation for receiving and processing claims, Epiq: (i) conferred with Class Counsel to define the project guidelines for processing claims; (ii) created a unique database to store Claim Form details and images of Claim Forms and supporting documentation; (iii) trained staff in the specifics of the project so that Claim Forms would be properly processed; (iv) formulated a communications protocol to ensure proper responses to telephone and email inquiries; (v) developed various computer programs and screens for entry of claimants’ identifying and transactional information; and (vi) developed a proprietary “calculation module” that would calculate Transaction Claim Amounts pursuant to the Court-approved Distribution Plan.

PROCESSING PAPER CLAIM FORMS

8. Of the 3,831 Claim Forms received by Epiq through July 3, 2025, 149 were paper Claim Forms only (claims received without any transactions). The process for intaking paper claims was time- and labor -intensive. Upon receipt, paper claims were opened and prepared for scanning. Once prepared, the paper claims were scanned into a database together with all submitted documentation.

9. Each paper form was assigned a unique Claim Number. The information from each Claim Form, including the claimant's name, address, account number/information, was entered into the database developed by Epiq to process claims submitted for the Settlements.

10. Epiq utilized internal codes to identify and classify any deficiency or ineligibility conditions that existed within the claims as they were processed. For example, where a Claim Form was submitted by a claimant who did not have any eligible transactions in Swiss Franc LIBOR-Based Derivatives during the Settlement Class Period, that claim would receive a defect code that denoted ineligibility. The message codes would indicate to Epiq personnel that the claimant is not eligible to receive any payment from the Net Settlement Funds with respect to that claim unless the deficiency was cured in its entirety. The ineligibility conditions utilized in these Settlements were as follows:

ND	No Documentation Submitted for the Entire Claim
MD	Inadequate Documentation
DP	Duplicate Claim
PO	No Eligible Transaction During the Class Period
SG	No Signature
ZR	No Transaction Claim Amount Under the Distribution Plan
ZD	No Transaction Claim Amount Due to Other Defects

11. Because a claim may be deficient only in part, but otherwise acceptable, Epiq utilized codes that only applied to specific transactions within a claim. For example, if a claimant submitted a Claim Form which, in addition to having eligible transactions, also listed ineligible transactions, the ineligible transactions would receive a transaction-specific defect code. The transaction-specific code indicated that the transaction was ineligible, unless the defect was cured, but the claim was otherwise eligible for payment based on the other transactions. Thus, even if the deficiency was never cured, the claim could still be partially accepted. The transaction-specific message codes utilized in these Settlements were as follows:

BL	Contract Did Not Balance/Trade Discrepancy
IS	Ineligible Derivative
MR	Missing Information

PROCESSING ELECTRONICALLY FILED CLAIM FORMS

12. Of the 3,831 claims received by Epiq through July 3, 2025, 3,682 claims were filed electronically (“Electronic Claims”). Electronic Claims are typically submitted by, or on behalf of, institutional investors who may have hundreds or thousands of transactions during the Settlement Class Period. Rather than provide reams of paper requiring data entry, the institutional investors or representatives filing Electronic Claims either mail a computer disc or electronically submit a file to Epiq so that Epiq may electronically upload all transactions to its proprietary database developed for the Settlement.

13. Epiq maintains a Securities Team to coordinate and supervise the receipt and handling of all Electronic Claims. In this case, the Securities Team reviewed and analyzed each electronic file to ensure that it was formatted in accordance with Epiq’s required format, and to identify any potential data issues or inconsistencies within the file. If any issues or inconsistencies

arose, Epiq notified the sender. If the electronic file was deemed to be in an acceptable format, it was then loaded to Epiq's database.

14. Once the file was loaded, the Electronic Claims were coded to identify them as Electronic Claims and, similar to the paper claims, message codes were applied to denote any deficiencies or ineligibility conditions that existed within them. In lieu of manually applying message codes, the Securities Team performed programmatic reviews of the Electronic Claims to identify deficiency and ineligibility conditions. The output was thoroughly verified and confirmed as accurate.

15. The review process also flagged any Electronic Claims that were not accompanied by a signed Claim Form, which serves as a "Master Proof of Claim Form" for all accounts referenced on the electronic file submitted. This process was reviewed by Epiq's Securities Team and, where appropriate, Epiq contacted the institutional filers whose electronic files were missing information. This ensures that all claims are submitted by properly authorized representatives of the claimants.

16. Finally, at the end of the claims intake process and after the Distribution Plan calculation methodology was applied, Epiq performed various targeted reviews and queries of the Electronic Claims. For example, Epiq used the calculated Transaction Claim Amounts and other criteria to query and identify a sampling of electronic filers to request additional information, such as confirmation slips or other transaction-specific supporting documentation, as part of its audit procedures. Epiq also reviewed: all calculations to confirm the results were consistent with the Distribution Plan; claims with high Transaction Notional Amounts; defect message codes for accuracy; duplicate claims and transactions to confirm that they have been correctly identified; all signed Master Proof of Claim forms and corresponding Proof of Authorities for all beneficial owners having a claim filed on their behalf; any outlier data points; and bulk filer claims submitted

by claims aggregators, law firms on behalf of their clients, third party financial institutions and other third party filers. Epiq also checked the name and contact information of beneficial owners and filers against its internal questionable filer lists (as described more fully below). These targeted reviews help to ensure that electronic data supplied by claimants does not contain inaccurate information. As set forth in ¶¶ 33-35 below, Epiq also performed additional Quality Assurance reviews.

17. As part of its targeted reviews, Epiq specifically identified 25 claimants from whom additional supporting documentation was requested. Twenty-three claimants responded with acceptable documentation to support their claimed transactions. The two claimants who did not provide documentation were notified that their claims would be recommended for rejection.

EXCLUDED PERSONS

18. Epiq also reviewed all claims to ensure that they were not submitted by or on behalf of “Excluded Persons,” to the extent that the identities of such persons or entities were known to Epiq through the list of Defendants and other excluded persons and entities set forth in the Stipulation and in the Notice, and through the claimants’ certifications on the claim forms.³

ADDITIONAL PROCESSING FOR DEFICIENT AND NON-CONFORMING CLAIMS

19. Epiq’s claims intake process identified claims that were deficient or ineligible for one or more reasons and, therefore, were subjected to the additional processing, correspondence and telephonic communications, as described in the sections below entitled “Deficiency Process—Paper Claims” and “Deficiency Process—Electronic Claims.”

20. During the processing of claims, Epiq also encountered “non-conforming” claims, which, in general, require significantly more work than ordinary claims because of the information

³ Epiq would ordinarily review all claims against the list of persons who were excluded from the Settlement Class pursuant to requests for exclusion, however there were no requests for exclusion in this Action.

contained in or missing from the claims or the manner in which the claims were completed. Non-conforming claims include, among other conditions, missing pages, no name or address, Claim Forms that are blank but submitted with documentation for Epiq to complete, and Claim Forms that are so materially deficient as to make what is being claimed unrecognizable. Such claims were also subject to the processes below but also may have involved additional direct intervention by Epiq to ensure the claims conformed to Epiq's requirements.

DEFICIENCY PROCESS—PAPER CLAIMS

21. All of the 149 paper claims received as of July 3, 2025 were incomplete or had one or more defects or conditions of ineligibility, such as the Claim Form not being signed, or indicating no eligible transactions in Swiss Franc LIBOR-Based Derivatives during the Settlement Class Period.

22. If a claim was determined to be defective or ineligible, a Notice of Deficient Claim Form Submission ("Deficiency Notice") was sent to the claimant describing the defect(s) or condition(s) of ineligibility in his, her or its claim and what was necessary to cure the defect(s) in the claim (if curable). The Deficiency Notice advised that the claimant would need to submit the appropriate information and/or documentary evidence to complete the claim within 20 days from the date of the letter. The Deficiency Notice further advised that if the appropriate information was not submitted in this timeframe, the claim would be recommended for rejection to the extent the deficiency or condition of ineligibility was not cured. The Deficiency Notice also advised claimants that if they desired to contest the administrative determination, they were required to submit a written statement to Epiq requesting Court review of the determination and setting forth the basis for their request. Attached hereto as Exhibit A is an example of the Deficiency Notice.

23. Claimants' responses to the Deficiency Notices were scanned into Epiq's database and associated with the corresponding claim form. The responses were then carefully evaluated

by Epiq's team of processors. If a claimant's response corrected the defect(s), Epiq updated the database manually to reflect the change in status of the claim.

DEFICIENCY PROCESS—ELECTRONIC CLAIMS

24. Of the 3,682 Electronic Claims received, 604 claims were deficient or ineligible. Epiq used the following process to inform Electronic Claim filers that their electronic submissions were deficient. Each filer was sent an email attaching a Transaction Report that:

(a) identified individual transactions and entire Electronic Claims that were found to be deficient or ineligible so that the filer had the opportunity to correct the deficient condition or contest the determination of ineligibility;

(b) stated that any ineligible or deficient transactions or Electronic Claims that remain uncured following the correction period would be rejected;

(c) notified the filer that, within 20 days, it could request that the Court review Epiq's administrative determinations if it wished to contest the rejection of any transactions or Electronic Claims; and

(d) provided Epiq's contact information if the filer had any questions or required assistance.

Attached hereto as Exhibit B is an example of this email and Transaction Report.

25. Responses to the Transaction Reports were reviewed by Epiq's Securities Team, scanned and/or loaded into Epiq's database, and were associated with the corresponding Electronic Claim. If the response corrected the defect(s) or affected the Electronic Claim's status, Epiq manually and/or programmatically updated the database to reflect the change in status of the Electronic Claim. If new defect(s) were introduced by the filer's response, a new Transaction Report identifying the newly introduced deficiencies was sent to the filer. However, if no changes are made to the claim based on the response, then no further communication was sent.

CLAIM DETERMINATION NOTICES

26. Upon request of Class Counsel, Epiq sent Claim Determination Notices. Attached hereto as Exhibit C is an example of the Claim Determination Notice. These Claim Determination Notices:

(a) were sent electronically to filers who submitted eligible claims that calculated to a Transaction Claim Amount greater than \$0.

(b) Identified the claim's Transaction Claim Amount.

(c) Stated that if the filer also received a Deficiency Notice (as outlined above), the Transaction Claim Amount listed on the Claim Determination Notice excluded any deficient transactions, and that the filer would receive an updated Claim Determination Notice with a revised Transaction Claim Amount if the filer successfully cured any of the deficiencies;

(d) Notified the filer that, within 20 days, it could request that the Court review Epiq's administrative determinations if it wished to contest the Transaction Claim Amount.

(e) Provided Epiq's contact information if the filer had any questions or required assistance.

27. Responses to the Claim Determination Notices were reviewed by Epiq's Securities Team, scanned and/or loaded into Epiq's database, and associated with the corresponding Electronic Claim. Epiq provided assistance to filers to correct their claims, and each filer that contacted Epiq regarding their calculated Transaction Claim Amount was able to have their concerns resolved and claims adjusted to calculate correctly.

REQUEST FOR CLAIMS REVIEW

28. As noted above, filers were advised that they had the right to contest Epiq's administrative determinations of deficiencies or ineligibility within 20 days from the date of notification and that they could request that the dispute be submitted to the Court for review. More

specifically, such persons were advised in the Deficiency Notice, Transaction Report, and the Claim Determination Notice that if they disputed Epiq's determinations, they had to provide a statement of reasons indicating the grounds for contesting the rejection, along with supporting documentation.

29. Epiq did not receive any requests for review by the Court of the administrative determination made by Epiq.

LATE BUT OTHERWISE ELIGIBLE CLAIMS

30. As of the October 27, 2023 claims deadline, Epiq received 3,036 claims. Through July 3, 2025, Epiq received 795 claims that were postmarked or received after the October 27, 2023 claim submission deadline established by the Court. Epiq has fully processed these claims. Of the late claims, 531 have been found to be otherwise eligible in whole or in part (the "Late But Otherwise Eligible Claims"). Epiq has not rejected any claim solely based on its late submission, and Epiq believes no delay has resulted from the provisional acceptance of these Late But Otherwise Eligible Claims. To the extent they are eligible but for the fact that they were late, they are recommended herein for payment.

31. However, there must be a final cut-off date after which no more claims will be accepted so that there may be a proportional distribution of the Net Settlement Funds, and the distribution may be accomplished. Accordingly, and in consultation with Class Counsel, Epiq recommends that no claim form received after July 3, 2025, or adjusted after November 13, 2025, be eligible for payment.

QUALITY ASSURANCE

32. As an ongoing part of its settlement administration work, Epiq conducts various Quality Assurance reviews to ensure that claims were processed properly; that deficiency and ineligibility message codes were properly applied to claims; that deficiency notices were sent to

the appropriate claimants; and that Epiq's computer programs were operating properly.

33. As part of the QA reviews, Epiq staff designed, implemented, tested and reviewed: (i) data entry screens that store claim information (including all transactional data included in each claim and in any supporting documentation), attach message codes, and, where necessary, apply text to denote conditions existing within the claim; (ii) analyst screens in which images of each Claim Form and any supporting documentation are examined; (iii) Epiq's in-house "load program," which converts the data submitted in Electronic Claims into the format required by the calculation program, and "analysis program," which determines if the Electronic Claims data is consistent and complete; (iv) a "calculation program" that analyzes the transactional data for all claims and calculates the Transaction Claim Amounts pursuant to the Court-approved Distribution Plan; and (v) Epiq's other in-house programs that generate various reports throughout and at the conclusion of the administration, including the lists of all eligible and ineligible claims.

34. Epiq's Securities Team also performed a final quality control check once all of the accepted claims were processed, deficiency notices were mailed, and deficiency responses were reviewed and processed, to ensure the correctness and completeness of all of the processed claims before Epiq prepared its final reports to Class Counsel. Here, in connection with this QA review, Epiq: (i) confirmed that the claims that are being recommended for approval have no message codes denoting ineligibility; (ii) confirmed that claims that are being recommended for rejection have message codes denoting ineligibility; (iii) confirmed that all claims requiring "deficiency" notices were sent such notices; (iv) performed a sample review of deficient claims; (v) reviewed a sampling of claims from top 25 Authorized Claimants with high Transaction Claim Amounts to confirm Epiq's determinations and from claimants who routinely refuse to provide supporting documentation upon request; (vi) sampled claims that had been determined to be ineligible, including those with no Transaction Claim Amount calculated in accordance with the Distribution

Plan, to verify that all transactions had been captured correctly; and (vii) retested the accuracy of the calculation program.

35. As part of its due diligence in processing the claims, Epiq also conducted a Questionable Claim Filer search of all paper claims and Electronic Claims filed in the Settlement. Epiq maintains a database of known questionable filers, containing the names, addresses, and aliases of individuals who have been investigated by government agencies for fraudulent claim filing, as well as the names and contact information compiled from previous settlements that Epiq has administered where fraudulent claims were received. Epiq updates the database on a regular basis. The database for the Settlements was searched for all individuals identified in our Questionable Claim Filer Database. Epiq performed searches based on name, aliases, address, and city/zip code. In addition, all of Epiq's claim processors are trained to identify any potentially inauthentic documentation when processing claims, including claims submitted by claimants not previously captured in our database as Questionable Claim Filers. Processors are instructed to flag such claims as Questionable Claims and route them to the Project Manager and Securities Team for review. No Questionable Claims were submitted.

DISPOSITION OF CLAIM FORMS

36. Epiq has completed the processing of the 3,831 claims that were postmarked or received through July 3, 2025 and has determined that 2,689 claims are acceptable in whole, 92 claims are acceptable in part, and that 1,050 claims should be wholly rejected because they are either ineligible, wholly deficient, or have no Transaction Claim Amount when calculated in accordance with the Court-approved Distribution Plan.

37. The 1,050 wholly rejected claims are recommended for rejection by the Court for the following reasons:

Summary of Rejected Claims Reason for Rejection	Number of Claims
No Eligible Transactions During the Settlement Class Period	113
Claim Did Not Result in a Transaction Claim Amount	170
Deficient Claim with Condition of Ineligibility Never Cured	2
Duplicate Claim	9
Claim Withdrawn/Voided and Replaced by Request	756
TOTAL	1,050

38. A list of the claims and Epiq’s recommendations as to their disposition is attached hereto as Exhibit D. Exhibit D-1, entitled “Timely Eligible Claims,” lists all timely filed, accepted claims, and states their Recognized Loss amounts. Exhibit D-2, entitled “Late But Otherwise Eligible Claims,” lists all late filed, accepted claims, and states their Transaction Claim Amounts. Exhibit D-3, entitled “Rejected Claims,” lists all wholly rejected claims, and states the reason for their rejection. For privacy reasons, Exhibit D provides only the claimant’s Claim Number and Transaction Claim Amount or Reason for Rejection (no names, addresses, Taxpayer ID, Social Security or Social Insurance Numbers are disclosed).

39. Epiq has determined that 2,781 claims should be accepted. The claims recommended for acceptance represent a total Transaction Claim Amount⁴ of CHF7,195,520,328,478.55 under the Court-approved Distribution Plan. A summary of the claims statistics is attached hereto as Exhibit E for reference.

⁴ All Transaction Notional Amounts and Transaction Claim Amounts were calculated in Swiss Franc (CHF) pursuant to the Distribution Plan.

40. According to the Court-approved Distribution Plan, each Authorized Claimant will be allocated a *pro rata* share of the Net Settlement Funds based on his, her or its Transaction Claim Amount in comparison to the total Transaction Claim Amounts of all Authorized Claimants.

FEES AND DISBURSEMENTS

41. Epiq agreed to be the Settlement Administrator for the Settlements in exchange for payment of its fees and expenses. Class Counsel received regular reports of and invoices for all of the work Epiq performed with respect to provision of notice and the administration of the Settlements and authorized the claims administration work performed herein.

42. The cost of the administration of the Settlements through November 30, 2025, totals \$860,164.92, which has been fully paid. Epiq estimates that the cost of distributing the Settlement, is \$58,685, which will be reserved prior to the initial distribution. Therefore, Epiq requests that the Court authorize the payment of an additional \$58,685 in connection with the distribution. Should the estimated cost to complete the distribution exceed the actual cost, Epiq will refund the difference to the Net Settlement Funds once the initial distribution is completed.

DISTRIBUTION OF THE NET SETTLEMENT FUNDS

43. Should the Court concur with Epiq's determinations concerning the accepted and rejected claims, including the Late But Otherwise Eligible Claims, Epiq recommends the following:

(a) Epiq will conduct an initial distribution (the "Initial Distribution") of the Net Settlement Funds, after deducting the payments previously allowed and requested herein, and after payment of any Taxes, the costs of preparing appropriate tax returns, and any escrow fees as follows:

(i) Epiq will calculate award amounts to all Authorized Claimants by calculating their *pro rata* share based on the ratio of the Authorized Claimant's Transaction Claim

Amount to the total of all Transaction Claim Amounts, multiplied by the Net Settlement Funds, in accordance with the Distribution Plan.

(ii) Epiq has been determined, in consultation with Class Counsel and after reviewing the Claim Forms, that it will set a Minimum Payment Amount of \$300. This amount accounts for claims payments that would be less than the cost of administering the claim and is calibrated to ensure that a minimal portion of the Net Settlement Funds is reallocated towards Authorized Claimants receiving the Minimum Payment Amount. There are approximately 2,076 Authorized Claimant whose *pro rata* share of the Net Settlement Funds is less than \$300 (as calculated under subparagraph (a)(i) above) that will receive the Minimum Payment Amount. These payments comprise approximately 1.09% of the Net Settlement Funds, or \$622,800.00. In contrast, if these Authorized Claimants were paid their award amount based on their *pro rata* share of the Net Settlement Funds, the payments would total approximately \$95,015.38 or approximately 0.17% of the Net Settlement Funds. Setting the Minimum Payment Amount will reallocate just 0.92% of the Net Settlement Funds towards paying these claimants.

(iii) After determining the portion of the Net Settlement Funds that will be used to make the Minimum Payment Amounts, Epiq will calculate the *pro rata* share of the remaining Net Settlement Funds for the remaining Authorized Claimants who will receive more than the Minimum Payment Amount pursuant to the calculations described in subparagraph (a)(i) above (“Distribution Amount”).

(iv) Authorized Claimants whose Distribution Amount calculates to less than \$50,000 pursuant to subparagraph (a)(iii) above will be paid their full Distribution Amount in the Initial Distribution (“Claims Paid in Full”). These Authorized Claimants will get no additional funds in subsequent distributions. A total of 2,741 Authorized Claimants (which

includes those receiving the Minimum Payment Amount) will be paid in full pursuant to this subparagraph.

(v) After deducting the payments to the Claims Paid in Full, 90% of the remaining balance of the Net Settlement Funds will be distributed to Authorized Claimants whose Distribution Amounts calculated to \$50,000 or more pursuant to subparagraph (a)(iii) above, on a *pro rata* basis based on their Distribution Amounts. There are 40 Authorized Claimants whose Distribution Amounts are equal to or greater than \$50,000. The remaining 10% of the Net Settlement Funds will be held in reserve (the “Reserve”) to address any contingencies that may arise. To the extent the Reserve is not depleted, the remainder will be distributed in the “Second Distribution” described in subparagraph (b) below.

(vi) Within 60 days of the Court’s order granting distribution of the Net Settlement Funds, Epiq will issue payments to Authorized Claimants, in the form of checks or (if requested) by wire transfer.

(vii) To encourage Authorized Claimants to promptly deposit check payments, all distribution checks will bear a notation “DEPOSIT PROMPTLY, VOID AND SUBJECT TO RE-DISTRIBUTION IF NOT NEGOTIATED WITHIN 90 DAYS OF ISSUE DATE.”

(viii) Authorized Claimants who do not cash their Initial Distribution checks within the time allotted will irrevocably forfeit all recovery from the Settlement. The funds allocated to all such stale-dated checks will be available to be re-distributed to other Authorized Claimants in the Second Distribution (should such distribution occur) as discussed below. Similarly, Authorized Claimants who do not cash their second or subsequent distributions (should such distributions occur) within the time allotted will irrevocably forfeit any further recovery from the Net Settlement Funds.

(b) After Epiq has made reasonable and diligent efforts to have Authorized Claimants cash their Initial Distribution checks, but no earlier than six months after the Initial Distribution, Epiq will conduct a second distribution of the Net Settlement Funds (the “Second Distribution”) in which any unclaimed amounts remaining in the Net Settlement Funds, including amounts remaining in the Reserve after the Initial Distribution, after deducting Epiq’s fees and expenses incurred in connection with administering the Settlements for which it has not yet been paid (including the estimated costs of such Second Distribution), and after the payment of any Taxes, the costs of preparing appropriate tax returns, and any escrow fees, will be distributed to all Authorized Claimants whose Distribution Amount from the Initial Distribution was at least \$50,000, who cashed their payment from the Initial Distribution and would receive at least \$300 from the Second Distribution based on their *pro-rata* share of the remaining funds.

(c) To allow a final distribution of any funds remaining in the Net Settlement Funds after completion of the Second Distribution, whether by reason of returned funds, tax refunds, interest, uncashed checks, or otherwise:

(i) If cost effective, not less than six months after the Second Distribution is conducted, Epiq will conduct a further distribution of the Net Settlement Funds, in which all funds remaining in the Net Settlement Funds, after deducting Epiq’s unpaid fees and expenses incurred or to be incurred in connection with administering the Net Settlement Funds (including the estimated costs of such distribution), and after the payment of any Taxes, the costs of preparing appropriate tax returns, and any escrow fees, will be distributed to Authorized Claimants who cashed their Second Distribution checks in an equitable and economic fashion. Additional re-distributions, after deduction of costs and expenses as described above and subject to the same conditions, may occur thereafter until Class Counsel, in consultation with Epiq, determines that further re-distribution is not cost-effective. At that point, the residual balance shall

be contributed to non-sectarian, not-for-profit organization(s), to be recommended by Class Counsel and approved by the Court.

(d) No new claim forms received after July 3, 2025, or adjusted after November 13, 2025 will be accepted. However, during the distribution process, should Epiq be notified of an adjustment for an Authorized Claimant that results in a lower Transaction Claim Amount, that adjustment will be made and the Transaction Claim Amount will be reduced accordingly

(e) Unless ordered by the Court, one year after the final distribution, or, if there are no additional distributions, two years after the Initial Distribution, Epiq will destroy the paper and electronic copies of the claim forms and all supporting documentation.

CONCLUSION

44. Epiq respectfully submits this declaration in support of Lead Plaintiffs' motion for authorization to distribute the Net Settlement Funds.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on January 22, 2026, in Seattle, WA.

Jessie Mahn