

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 AND EXPENSES**

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 Class Counsel for Plaintiffs in these related actions.

3. I respectfully submit this declaration in support of Class Counsel’s Motion for Award of Attorneys’ Fees and Expenses in connection with Lead Plaintiffs’ settlements with Defendants The Bank of Tokyo-Mitsubishi UFJ, Ltd. (now known as MUFG Bank, Ltd.) (“BTMU”) and Mitsubishi UFJ Trust and Banking Corporation (“MUTB”).

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. Expense items are billed separately and such charges are not duplicated in the firm’s current billing rates. Further, expense items do not contain any general overhead costs and do not contain a surcharge over the amount paid to the corresponding vendor(s).

6. As detailed and categorized in the below schedule, Lowey has incurred a total of \$178,324.42 in expenses from October 1, 2017 through April 30, 2018, 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 costs of Plaintiffs' experts and consultants and of hosting and using Relativity, a sophisticated document review platform, to manage and analyze Defendants' productions in discovery represent 93.1% of Lowey's expenses during this period.

Expense Categories	Cumulative Expenses
Professional, Consulting, or Expert Fees	\$119,247.76
Document Review, IT and Maintenance	\$46,775.70
In-House Copying	\$4,979.20
Computer Research, Databases & Docket	\$3,599.75
Travel - Airfare, Lodging, Meals, Taxi	\$2,892.75
Conferences, Meetings, Telephone, & Telecopier	\$372.61
Acquisition of Court Transcripts/Court Reporter Fees	\$234.96
Postage, Mailing, FedEx, UPS, Fares & Messengers	\$221.69
TOTAL	\$178,324.42

7. Based on these expenses and the expenses of additional Plaintiffs' Counsel, there will be \$62,693.73 remaining in the above-referenced litigation fund.

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 June 4, 2018

/s/ Geoffrey Horn

Geoffrey Horn