

**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., HAYMAN CAPITAL MASTER FUND, L.P., JAPAN MACRO OPPORTUNITIES MASTER FUND, L.P., and CALIFORNIA STATE TEACHERS' RETIREMENT SYSTEM, on behalf of themselves and all others similarly situated,

Plaintiffs,

- against -

UBS AG, UBS SECURITIES JAPAN CO. LTD., SOCIÉTÉ GÉNÉRALE S.A., NATWEST GROUP PLC, NATWEST MARKETS PLC, NATWEST MARKETS SECURITIES JAPAN LTD, NATWEST MARKETS SECURITIES, INC., BARCLAYS BANK PLC, BARCLAYS PLC, COÖPERATIEVE RABOBANK U.A., LLOYDS BANKING GROUP PLC, LLOYDS BANK PLC, NEX INTERNATIONAL LIMITED, ICAP EUROPE LIMITED, TP ICAP PLC, BANK OF AMERICA CORPORATION, BANK OF AMERICA, N.A., MERRILL LYNCH INTERNATIONAL, AND JOHN DOE NOS. 1-50,

Defendants.

Docket No. 15-cv-5844
(GBD)(SLC)

**DECLARATION OF VINCENT BRIGANTI
IN SUPPORT OF CLASS COUNSEL'S MOTION FOR AWARD
OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

I, Vincent Briganti, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I am a member of the Bar of this Court and the Chairman and a shareholder of the law firm Lowey Dannenberg, P.C. (“Lowey”). I respectfully submit this declaration in support of Class Counsel’s Motion for Award of Attorneys’ Fees and Reimbursement of Expenses in connection with the Settlement with Société Générale (“SocGen”). At all times relevant hereto, Lowey served as counsel for Representative Plaintiffs and the Court-appointed settlement class counsel for the proposed Settlement with SocGen in the above-captioned action (the “Action”).¹

2. 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.

3. I am the shareholder who oversaw my firm’s involvement in the Action. Lowey’s time records (including, where necessary, backup documentation) have been reviewed to confirm both the accuracy of the entries as well as the necessity for and reasonableness of the time expended in this litigation. As a result of this review, the hours reflected in Lowey’s lodestar calculation are reasonable in amount and were necessary to prosecute the Action and reach the Settlement before the Court. In addition, these fees are often charged by Lowey to its fee-paying clients.

4. The services Lowey performed on behalf of Representative Plaintiffs and putative class are set forth in my separate declaration in support of (A) Representative Plaintiffs’ Motion for Final Approval of Class Action Settlement with Société Générale; and (B) Class Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Expenses, filed herewith.

¹ Unless otherwise indicated, ECF citations herein are to the docket in this Action. Unless otherwise defined, capitalized terms herein have the same meaning as in the SocGen Settlement Agreement (the “Settlement Agreement”). ECF No. 738-1.

Attached hereto as **Exhibit A** is a chart summarizing the total time and lodestar expended by Lowey attorneys from (i) inception through March 31, 2023, and (ii) January 1, 2023 through March 31, 2024, describing the lodestar value of the hours worked since Class Counsel's previous motion seeking an award of attorneys' fees in the Action. The lodestar for the period from inception through December 31, 2022 is based on the hourly billing rates previously reported to the Court, and the lodestar for the period from January 1, 2023 through March 31, 2024 is based on the firm's current hourly billing rates. This chart was prepared based upon daily time records maintained by Lowey timekeepers. The time and lodestar spent preparing the fee and expense applications have been excluded. For personnel no longer employed by Lowey, the lodestar calculation is based on the billing rates for such personnel during his or her time of employment.

5. The total time for which my firm has requested an award of legal fees is 124,049.62 hours, including 5,788.20 hours for the period between January 1, 2023 and March 31, 2024. The total loadstar value of these professional services is \$72,766,052.30, which includes \$5,592,938.00 for the work performed between January 1, 2023 and March 31, 2024.

6. 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).

7. As detailed and categorized in the below schedule, Lowey has incurred a total of \$561,027.06 in expenses from January 1, 2023 through March 1, 2024. The costs of Plaintiffs' experts and consultants (\$357,205.98) represent 63.7% of Lowey's expenses during this period.

EXHIBIT A

Schedule of Attorneys' Rates and Total Hours Billed in the Actions

Name and Position¹	Current Rate	Hours from inception to 3/31/24	Lodestar from inception to 3/31/24	Hours from 1/1/23 to 3/31/24	Lodestar from 1/1/23 to 3/31/24
Raymond Girnys (P)	\$1,175	9,582.30	\$6,128,734.50	492.30	\$578,452.50
Vincent Briganti (S)	\$1,500	8,290.70	\$8,203,040.50	294.80	\$442,200.00
John D'Amico (A)	\$755	6,511.70	\$3,677,102.50	465.50	\$351,452.50
Jennifer Tembeck (SA)	\$755	6,431.30	\$3,482,006.00	1,420.20	\$1,072,251.00
Sitso Bediako (P)	\$1,175	6,071.40	\$4,289,319.00	406.20	\$477,285.00
Geoffrey M. Horn (S)	\$1,500	5,899.80	\$5,741,179.00	108.60	\$162,900.00
Frank Strangeman (SA)	\$835	5,114.50	\$3,246,742.50	584.00	\$487,640.00
Lee Yun Kim (A)	\$390	4,733.70	\$1,846,143.00	0.00	\$0.00
Peter D. St. Phillip, Jr. (S)	\$1,500	4,550.80	\$4,302,632.00	3.20	\$4,800.00
Ian Sloss (A)	\$550	4,472.60	\$2,459,930.00	0.00	\$0.00
Christian Levis (P)	\$1,175	4,142.30	\$2,500,954.50	0.70	\$822.50
Yong Kim (A)	\$340	3,799.10	\$1,291,694.00	0.00	\$0.00
Sylvie Bourassa (A)	\$460	3,683.70	\$1,436,790.00	0.00	\$0.00
Michelle Conston (A)	\$400	3,516.80	\$1,406,720.00	0.00	\$0.00
Lee J. Lefkowitz (A)	\$550	3,197.60	\$1,758,680.00	0.00	\$0.00
Roland R. St. Louis III (P)	\$1,175	2,782.00	\$1,537,957.50	32.70	\$38,422.50
Richard C. Frank (A)	\$340	2,647.70	\$900,218.00	0.00	\$0.00
Samantha L. Breitner (A)	\$430	2,455.30	\$835,747.00	0.00	\$0.00
Thomas M. Skelton (P)	\$1,015	2,350.85	\$2,221,675.75	0.00	\$0.00
Craig Maider (A)	\$485	2,039.62	\$758,873.30	0.00	\$0.00
Henry J. Kusjanovic (A)	\$430	1,920.70	\$701,991.50	0.00	\$0.00
Peter Barile III (OC)	\$1,045	1,858.20	\$1,907,744.00	1,623.20	\$1,696,244.00
Matthew Guarnero (A)	\$325	1,806.20	\$587,015.00	0.00	\$0.00
Katherine Vogel (PL)	\$395	1,646.80	\$479,417.00	12.00	\$4,740.00
Melissa Cabrera (A)	\$400	1,646.10	\$658,440.00	0.00	\$0.00
Margaret C. MacLean (P)	\$1,175	1,493.90	\$1,448,742.50	118.50	\$139,237.50

¹ "S" refers to Shareholders, "P" refers to Partners, and "OC" refers to Of Counsel. "SA" refers to Senior Associates and "A" refers to Associates of the Firm. "AA" refers to law graduates who were awaiting admission. "PL" refers to paralegals. The hourly rates for the attorneys and professional support staff in my firm included above are the same rates charged for their services in non-contingent matters and/or which have been accepted and approved in other complex class action litigation. *See, e.g., Sullivan v. Barclays plc et al.*, No. 13-cv-2811 (PKC), ECF No. 550 (S.D.N.Y. Nov. 15, 2022) (order granting fee award based on in part on the reasonableness of Lowey's hourly rates and lodestar).

Name and Position¹	Current Rate	Hours from inception to 3/31/24	Lodestar from inception to 3/31/24	Hours from 1/1/23 to 3/31/24	Lodestar from 1/1/23 to 3/31/24
Jennifer Risener (A)	\$420	1,463.90	\$614,838.00	0.00	\$0.00
Adam Settle (A)	\$325	1,456.50	\$473,362.50	0.00	\$0.00
Anthony Christina (A)	\$520	1,355.80	\$495,192.50	0.00	\$0.00
Matthew Acocella (A)	\$375	1,346.20	\$504,825.00	0.00	\$0.00
William J. Olson (A)	\$365	1,120.40	\$408,946.00	0.00	\$0.00
Bracha Gefen (A)	\$460	950.40	\$380,098.50	0.00	\$0.00
Andrew Sacher (SA)	\$900	886.75	\$744,588.00	0.00	\$0.00
Christina McPhaul (A)	\$400	884.30	\$324,645.50	0.00	\$0.00
Anita Alexander (A)	\$325	833.10	\$270,757.50	0.00	\$0.00
Bonnie Espino (A)	\$350	810.10	\$283,535.00	0.00	\$0.00
Peter Demato, Jr. (SA)	\$1,045	761.70	\$282,228.50	1.00	\$1,045.00
Anthony Odorisi (A)	\$365	731.85	\$267,125.25	0.00	\$0.00
Adebola M. Aderinto (A)	\$325	720.00	\$234,000.00	0.00	\$0.00
Amir Alimehri (A)	\$410	642.30	\$224,706.50	0.00	\$0.00
Garam Choe (A)	\$325	574.50	\$186,712.50	0.00	\$0.00
Renee Nolan (P)	\$365	552.40	\$201,626.00	0.00	\$0.00
Gerald Lawrence (S)	\$945	542.50	\$512,662.50	0.00	\$0.00
Charles Z. Kopel (A)	\$605	533.00	\$267,290.50	67.70	\$40,958.50
Gregory Santiago (PL)	\$210	486.70	\$78,412.00	9.00	\$1,890.00
Stephen Fay (PL)	\$180	477.40	\$77,074.00	9.00	\$1,890.00
Amanda G. Fiorilla (A)	\$485	364.10	\$147,740.75	0.00	\$0.00
Barbara J. Hart (P)	\$980	295.10	\$278,880.00	0.00	\$0.00
Scott Papp (SA)	\$755	286.10	\$189,775.50	64.60	\$48,773.00
Joanne Mannion (PL)	\$180	286.10	\$45,816.00	0.00	\$0.00
Deborah Rogozinski (SA)	\$550	275.10	\$151,305.00	0.00	\$0.00
Shelly Chauncey (A)	\$365	254.10	\$92,746.50	0.00	\$0.00
Richard W. Cohen (P)	\$945	242.20	\$228,879.00	0.00	\$0.00
Romina Curecheriu (AA)	\$300	227.60	\$68,280.00	0.00	\$0.00
David C. Harrison (P)	\$1,015	212.70	\$178,878.00	0.00	\$0.00
Elisa Horn (PL)	\$150	208.20	\$31,230.00	0.00	\$0.00
Timothy B. Rode (A)	\$390	205.70	\$80,223.00	0.00	\$0.00
Luke Goveas (A)	\$460	153.80	\$66,588.00	0.00	\$0.00
Johnathan P. Seredynski (SA)	\$775	146.80	\$95,325.00	6.90	\$5,347.50
Grace Lee (A)	\$365	126.90	\$46,318.50	0.00	\$0.00
Sung-Min Lee (A)	\$600	110.10	\$66,060.00	0.00	\$0.00

Name and Position¹	Current Rate	Hours from inception to 3/31/24	Lodestar from inception to 3/31/24	Hours from 1/1/23 to 3/31/24	Lodestar from 1/1/23 to 3/31/24
Radhika Gupta (A)	\$565	100.10	\$51,989.00	56.60	\$31,979.00
Sylvia Hoffmann (PL)	\$160	86.70	\$13,872.00	0.00	\$0.00
Melonie Penrhyn (PL)	\$315	67.00	\$21,105.00	0.00	\$0.00
Noelle F. Ruggiero (P)	\$575	62.60	\$35,995.00	0.00	\$0.00
Julia R. McGrath (A)	\$365	62.20	\$22,703.00	0.00	\$0.00
David Zepeda (A)	\$370	61.85	\$20,095.00	0.00	\$0.00
Uriel Rabinovitz (P)	\$1,015	60.00	\$35,028.00	0.00	\$0.00
Alesandra Greco (A)	\$460	52.60	\$22,196.00	0.00	\$0.00
Yuanchen Lu (A)	\$460	52.25	\$24,035.00	0.00	\$0.00
Noelle Forde (A)	\$520	46.90	\$24,388.00	0.00	\$0.00
Matthew Roberts (A)	\$370	46.50	\$17,205.00	0.00	\$0.00
Joseph Mansilla (A)	\$350	38.60	\$13,510.00	0.00	\$0.00
Thomas Griffith (A)	\$485	37.85	\$18,357.25	0.00	\$0.00
Maribel Valentin (PL)	\$160	35.50	\$5,680.00	0.00	\$0.00
Christopher DeVivo (A)	\$430	29.50	\$12,685.00	0.00	\$0.00
James Pedersen (A)	\$430	13.50	\$5,805.00	0.00	\$0.00
Myra Fromholz (PL)	\$395	12.90	\$4,963.50	10.50	\$4,147.50
Vincent Cappucci (A)	\$485	12.00	\$5,820.00	0.00	\$0.00
Lanay Mitchell (A)	\$460	1.00	\$460.00	1.00	\$460.00
TOTALS		124,049.62	\$72,766,052.30	5,788.20	\$5,592,938.00