

“Preliminary Approval Order”), the Court appointed A.B. Data to serve as Settlement Administrator for purposes of the Settlement. This Declaration reports the implementation of the notice plan (*see* Declaration of Linda V. Young, attached as Ex. 1 to the Declaration of Vincent Briganti, Esq. dated June 25, 2020 (the “Briganti Decl.”)), which consists of the following:

- A. Disseminating copies of the Mailed Notice to potential Class Members, including:
 - i) Deutsche Bank’s known counterparties for Silver Instruments during the Class Period based on transactional and other data provided by Deutsche Bank;
 - ii) A.B. Data’s proprietary list of banks, brokers, and other nominees, which are likely to trade or hold Silver Instruments on behalf of themselves and their clients; and
 - iii) the largest dealers of precious metals.
- B. Publishing and releasing the Publication Notice as follows: i) *The Wall Street Journal*; ii) *Investor’s Business Daily*; iii) *Financial Times*; iv) *Barron’s*; v) *Global Capital*; vi) *Hedge Fund Alert*; vii) *Grant’s Interest Rate Observer*; viii) *MJSA-Manufacturing Jewelers & Suppliers of America*; ix) *Zacks.com*; x) *Traders.com*; xi) *HFAAlert.com*; xii) *GlobalInvestorGroup.com*; xiii) *Stocks & Commodities*; xiv) *NationalJewelers.com*; xv) *Kitco.com*; xvi) *KitcoSilver.com*; xvii) *ModernMetals.com*; and xviii) *FFJournal.net*.
- C. Disseminating notice in e-newsletters from i) *Global Investor Group*; ii) *Stocks & Commodities*; and iii) *Zacks.com*, and electronically by email “blasts” through i) *Stocks & Commodities*; and ii) *Zacks.com*.
- D. Disseminating a news release via *PR Newswire*’s US1 Newswire distribution list.
- E. Establishing a case-specific website, which made available copies of the Mailed Notice and Proof of Claim and Release forms in downloadable form, as well as other case-related documents, at www.SilverFixSettlement.com.

DIRECT MAIL NOTICE

4. On or about August 5, 2020, A.B. Data received from Interim Co-Lead Counsel files containing both the names and addresses of Silver Fix counterparties of Deutsche Bank. The data received was electronically processed by A.B. Data to ensure adequate address formatting and the elimination of duplicate names and addresses. The names and addresses were then loaded into a segregated database created for this Action.

5. A.B. Data maintains a database of the largest banks, brokerage houses and clearing firms, and members of ISDA.

6. A.B. Data compiled all of the names and addresses referenced in ¶¶ 4 - 5 above, resulting in 5,519 distinct records for mailing as of September 4, 2020 (the “Initial Mailing List”). A.B. Data standardized and updated the Initial Mailing List addresses using NCOALink.

7. On or about September 29, 2020, A.B. Data received from Interim Co-Lead Counsel files containing both the names and addresses of the largest traders of Silver from the Intercontinental Exchange (“ICE”). The data received was electronically processed by A.B. Data to ensure adequate address formatting and the elimination of duplicate names and addresses. The names and addresses were then loaded into a segregated database created for this Action. As a result, 15 additional distinct records were derived from the ICE largest traders and added to the Initial Mailing List.

8. On or about October 22, 2020, A.B. Data received from Interim Co-Lead Counsel files containing both the names and addresses of counterparties and clearing firms of Silver from the CME Group, Inc. The data received was electronically processed by A.B. Data to ensure adequate address formatting and the elimination of duplicate names and addresses. The names and addresses were then loaded into a segregated database created for this Action. As a result, 7,976 additional distinct records were derived from the CME counterparties and added to the Initial Mailing List.

9. Pursuant to Paragraph 6 of the Preliminary Approval Order, the initial mailing was to be commenced no later than September 4, 2020, and be completed no later than November 7, 2020. Beginning September 4, 2020, and through November 7, 2020, A.B. Data caused 16,996

Notice Packets to be mailed via first-class mail, postage prepaid, to persons and entities on the Initial Mailing List. A true and accurate copy of the Notice Packet is attached hereto as Exhibit A.

10. As of January 12, 2021, 2,364 Notice Packets were returned by the USPS to A.B. Data as undeliverable as addressed (“UAA”). Of those returned UAA, 10 had forwarding addresses and were promptly re-mailed to the updated address. The remaining 2,354 were processed through LexisNexis and/or other publicly available databases to obtain an updated address. Of these, 670 new addresses were obtained, and A.B. Data promptly re-mailed the Notice Packets to these potential Settlement Class Members.

11. In consultation with Interim Co-Lead Counsel, after reviewing the responses received from brokers and nominees to the initial mailing, A.B. Data obtained a list of entities who likely bought or sold physical silver or silver derivatives, including institutions involved in the mining, manufacturing or processing of precious metals and investing-related entities such as commodity contract pool operations and commodity contract trading companies. The names and addresses were then loaded into a segregated database created for this Action. As a result, an additional 18,907 distinct records were added and mailed a Notice Packet on December 29, 2020.

12. In aggregate, 35,903 Notice Packets were disseminated to potential Settlement Class Members as of January 12, 2021.

MEDIA NOTICE

13. In accordance with Paragraph 7 of the Preliminary Approval Order and as described in the Declaration of Linda Young, dated June 24, 2020 (Briganti Decl., Ex. 1) and approved by the Court, A.B. Data utilized paid and earned media to reach unidentifiable Class Members, including national financial newspapers, national financial magazines, national financial websites,

email notice through an email “blast,” national sponsorship of selected financial newsletters, and earned media, including a news release.

14. On September 4, 2020, A.B. Data caused the Publication Notice to be released via *PR Newswire*. Copies of proof of publication over *PR Newswire* are attached hereto as Exhibit B.

15. Beginning on September 14, 2020, A.B. Data caused the Publication Notice to be placed in each of the following publications. A copy of the Publication Notice is attached hereto as Exhibit C.

Publication	Issue Date
<i>Financial Times</i> (U.S. audience only)	September 14 and 24, 2020
<i>The Wall Street Journal</i> (U.S. audience only)	September 14 and 23, 2020
<i>Investor’s Business Daily</i>	September 14 and 21, 2020
<i>Barron’s</i>	September 21 and 28, 2020
<i>Global Capital</i>	September 24, October 1 and 8, 2020
<i>MJSA (Manufacturing Jewelers & Suppliers of America)</i>	October 2020 Issue
<i>Hedge Fund Alert</i>	September 13 and 20, 2020
<i>FF Journal</i>	November 2020 Issue
<i>Modern Metals</i>	November 2020 Issue
<i>Zacks.com</i>	September 29, 2020
<i>Stocks & Commodities</i>	October 2020 Issue
<i>Grant’s Interest Rate Observer</i>	September 18, October 2 and 16, 2020

16. Beginning on September 21, 2020, A.B. Data caused banner ads to be placed on the following websites. To ensure that the Class Notice Plan had the widest reach possible, A.B. Data, in consultation with Interim Co-Lead Counsel, also developed an online marketing campaign using LinkedIn and Google Display Networks to further direct information about the Settlement to potential Settlement Class Members. A sample copy of the banner ads is attached hereto as Exhibit D.

Website	Issue Date
Zacks.com	9/21/20 - 10/20/20

<i>National Jeweler</i>	9/21/20 - 10/20/20
Kitco.com	9/21/20 – 10/20/20
<i>Stocks & Commodities</i>	9/21/20 – 10/20/20
GlobalInvestorGroup.com	9/21/20 - 10/20/20
<i>FF Journal</i>	10/1/20 – 10/31/20
<i>Modern Metals</i>	10/1/20 – 10/31/20
<i>Google Display Network</i>	1/6/21 – Ongoing
<i>LinkedIn</i>	1/6/21 – Ongoing

17. A.B. Data caused banner ads to be placed at the top of newsletters to “opt-in” subscribers of financial newsletters. A sample copy of a newsletter is attached hereto as Exhibit E.

Publication E-newsletter	Issue Date
<i>Global Investor Group</i>	9/21/20 thru 10/20/20
<i>Stocks & Commodities</i>	10/15/20 thru 11/14/20
Zacks.com	10/8/20 and 10/19/20
<i>Barchart</i>	9/21/20 thru 10/20/20

18. A.B. Data coordinated an email blast of the Publication Notice to be sent to “opt-in” subscribers of the following publications. A copy of the email is attached hereto as Exhibit F.

Website	Issue Date
<i>Stocks & Commodities</i>	10/6/20
<i>Zacks.com</i>	9/29/20

WEBSITE

19. In accordance with previous Orders for the above-captioned Actions, on or about September 4, 2020, A.B. Data established the case-specific website, www.SilverFixSettlement.com. Pursuant to Paragraph 8 of the Preliminary Approval Order, A.B. Data has continued to maintain the website. The website lists, among other things, the exclusion, objection, and claim filing deadlines, the date and time of the Fairness Hearing, and general information regarding the case and its current status, and provides answers to frequently asked questions. Users of the website can file a claim online, view and download copies of the Plan of Distribution, the Preliminary Approval Order, the Mailed and Publication Notices, the Proof of

Claim and Release, and copies of other court documents. A true and accurate copy of the web homepage is attached as Exhibit G.

20. Additionally, the website includes an email address (info@silverfixsettlement.com) for claimants to contact A.B. Data with questions or for any additional information. The Settlement website has been visited 16,971 times, and the mailed notice and/or Proof of Claim downloaded from the website 206 times since A.B. Data began tracking this data on December 1, 2020

TOLL-FREE TELEPHONE LINE

21. In accordance with previous Orders for the above-captioned Actions, on or about September 4, 2020, a case-specific toll-free number, 800-254-2939, was established with an Interactive Voice Response system and live operators. Pursuant to Paragraph 9 of the Preliminary Approval Order, callers to the toll-free number are presented with a series of choices to respond to basic questions. If callers need further help, they have the option to be transferred to a live operator during business hours.

REPORT ON EXCLUSIONS

22. Pursuant to Paragraph 17 of the Preliminary Approval Order and Section III.C of the Mailed Notice, those members of the 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 and case number of the Action (*In re London Silver Fixing, Ltd. Antitrust Litigation*, Nos. 14-md-02573 (VEC) (S.D.N.Y.), 14-mc-02573 (VEC) (S.D.N.Y.)); (iv) a statement certifying such person is a Settlement Class Member; (v) a description of the Silver Instruments transactions entered into by the Settlement Class Member that fall within the

Settlement Class definition (including, for each transaction, the date, time, and location of the transaction, the instrument type, direction (*i.e.*, purchase or sale) of the transaction, the counterparty, any transaction identification numbers, and the total amount transacted (in both ounces of silver and in U.S. Dollars)); and (vi) a statement that “I/we hereby request that I/we be excluded from the Settlement Class.” All written requests must be signed by the member of the Settlement Class (or his, her, or its legally authorized representative), and sent by U.S first-class mail (or if sent from outside the U.S. by a service that provides for guaranteed delivery within five (5) or fewer calendar days of mailing) to the Settlement Administrator received no later than February 11, 2021.

23. As of the date of this Declaration, A.B. Data has received one requests for exclusion.


REPORT ON OBJECTIONS

24. Pursuant to Paragraph 12 of the Preliminary Approval Order and Section III.B of the Mailed Notice, those members of the Settlement Class and any governmental entity who wish to object to the fairness, reasonableness, or adequacy of any term or aspect of the Settlement, application for attorneys’ fees and expenses, or the Final Approval Order and Final Judgment are to file such objection with the Court and serve on Interim Co-Lead Counsel and Deutsche Bank’s Counsel no later than February 11, 2021.

25. As of the date of this Declaration, A.B. Data has not received any objections to the Settlement and knows of no other objections sent to Interim Co-Lead Counsel and Deutsche Bank’s Counsel.

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

Executed this 21st day of January 2021 in Milwaukee, Wisconsin.



Steven Straub

EXHIBIT A

**IMPORTANT LEGAL NOTICE TO ALL MEMBERS OF THE CLASS
FORWARD TO CORPORATE HEADQUARTERS/LEGAL COUNSEL**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re London Silver Fixing, Ltd., Antitrust Litigation

No. 14-MD-02573 (VEC)
No. 14-MC-02573 (VEC)

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT,
APRIL 8, 2021 FAIRNESS HEARING THEREON AND CLASS MEMBERS' RIGHTS**

TO: ALL PERSONS OR ENTITIES THAT TRANSACTED IN U.S.-RELATED TRANSACTIONS IN OR ON ANY OVER-THE-COUNTER MARKET ("OTC") OR EXCHANGE IN PHYSICAL SILVER OR IN A DERIVATIVE INSTRUMENT IN WHICH SILVER IS THE UNDERLYING REFERENCE ASSET (COLLECTIVELY, "SILVER INSTRUMENTS"), AT ANY TIME FROM JANUARY 1, 1999 THROUGH SEPTEMBER 6, 2016, WHERE SUCH PERSONS OR ENTITIES WERE EITHER DOMICILED IN THE UNITED STATES OR ITS TERRITORIES OR, IF DOMICILED OUTSIDE THE UNITED STATES OR ITS TERRITORIES, TRANSACTED IN THE UNITED STATES OR ITS TERRITORIES.

*A federal court authorized this Notice. This is not a solicitation from a lawyer.
You are not being sued.*

PLEASE READ THIS ENTIRE NOTICE CAREFULLY. A UNITED STATES FEDERAL COURT AUTHORIZED THIS NOTICE. YOUR RIGHTS MAY BE AFFECTED BY THE PROCEEDINGS IN THIS ACTION. THIS NOTICE ADVISES YOU OF YOUR RIGHTS AND OPTIONS WITH RESPECT TO THIS ACTION, INCLUDING WHAT YOU MUST DO IF YOU WISH TO SHARE IN THE PROCEEDS OF THE SETTLEMENT. TO CLAIM YOUR SHARE OF THE SETTLEMENT, YOU MUST ELECTRONICALLY SUBMIT YOUR CLAIM ON OR BEFORE MARCH 1, 2021 OR MAIL YOUR CLAIM TO THE ADDRESS IN SECTION VIII SO THAT IT IS RECEIVED NO LATER THAN MARCH 1, 2021.

If you are a brokerage firm, dealer, or trustee through whom Silver Instruments were traded from January 1, 1999 through September 6, 2016, inclusive, on behalf of customers that are members of the Settlement Class as defined in Section I.C. below, you must provide the name and last known address of such customers to the Settlement Administrator at the address listed in Section VIII below within two weeks of receiving this Notice. The Settlement Administrator will cause copies of this Notice to be forwarded to each customer identified at the address so designated.

This Notice of Proposed Class Action Settlement, April 8, 2021 Fairness Hearing Thereon and Class Members' Rights ("Notice") is given pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Southern District of New York (the "Court"). It is not junk mail, an advertisement, or a solicitation from a lawyer. You have not been sued. The purpose of this Notice is to inform you of the pendency of the above-captioned class action and your rights in connection with the proposed Settlement and release of the claims asserted.

A class action is a lawsuit in which one or more representative plaintiffs (in this case, Plaintiffs) bring a lawsuit on behalf of themselves and other similarly situated persons (i.e., a class) who have similar claims against the defendants. The representative plaintiffs, the court, and counsel appointed to represent the class have a responsibility to make sure that the interests of class members are adequately represented.

You are receiving this Notice because records indicate that you may have transacted in one or more Silver Instruments during the Settlement Class Period and may be a Settlement Class Member in this class action.

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE. Inquiries concerning this Notice, the Proof of Claim and Release (the "Claim Form"), or any other questions by Settlement Class Members should be directed to:

London Silver Fixing Settlement
c/o A.B. Data, Ltd.
P.O. Box 173103
Milwaukee, WI 53217

Tel.: 1-800-254-2939 (if calling from outside the United States or Canada, call 1-414-961-6577)

Email: info@SilverFixSettlement.com

Website: www.SilverFixSettlement.com

Settling Defendants are Deutsche Bank AG, Deutsche Bank Americas Holding Corporation, DB U.S. Financial Markets Holding Corporation, Deutsche Bank Securities, Inc., Deutsche Bank Trust Corporation, Deutsche Bank Trust Company Americas, Deutsche Bank AG New York Branch, and their subsidiaries and affiliates (collectively "Deutsche Bank"). Deutsche Bank denied and continues to deny Plaintiffs' claims. By entering into the proposed settlement, Deutsche Bank has not admitted to any liability, fault, or wrongdoing of any kind in connection with the allegations in the Action, and nothing in the Settlement Agreement or this Notice shall be construed as such an admission.

Plaintiffs entered into a settlement agreement with Deutsche Bank on September 6, 2016 (the “Settlement Agreement”).¹ To resolve all Released Claims against all DB Released Parties, Deutsche Bank has paid into escrow a total of \$38 million dollars.²

Deutsche Bank has also agreed to certain cooperation obligations, which have assisted and will continue to assist Plaintiffs in prosecuting the claims against the remaining Defendants. Deutsche Bank has agreed to use its reasonable best efforts to provide interviews with current and former employees, and has already provided transaction data, documents, and information relevant to the allegations made in the Action.

The Court has preliminarily approved the Settlement with Deutsche Bank. The Court has appointed the lawyers listed below to represent you and the Settlement Class in this Action (“Plaintiffs’ Interim Co-Lead Counsel”):

Vincent Briganti
LOWEY DANNENBERG, P.C.
44 S. Broadway, Suite 1100
White Plains, NY 10601
Telephone: (914) 733-7221
vbriganti@lowey.com

Robert Eisler
GRANT & EISENHOFER P.A.
485 Lexington Avenue, 29th Floor
New York, NY 10017
Telephone: (646) 722-8500
reisler@gelaw.com

Only Settlement Class Members Who Submit a Valid Claim Form in Response to this Notice Will Be Eligible to Participate in the Net Settlement Fund. Assuming final approval by the Court, the thirty-eight million dollars (\$38,000,000) plus interest obtained from Deutsche Bank, net of such attorneys’ fees, costs, fees, taxes, and other deductions as are approved by the Court (the “Net Settlement Fund”), will be distributed to Settlement Class Members who properly complete and timely return a valid Claim Form and are entitled to distribution under the Distribution Plan.

Fairness Hearing and Right to Object. The Court has scheduled a public hearing on final approval of the Settlement for April 8, 2021 (“Fairness Hearing”). The purpose of the Fairness Hearing is to determine, among other things, whether the Settlement, the Distribution Plan, and the application by Plaintiffs’ Interim Co-Lead Counsel for attorneys’ fees and payment of expenses are fair, reasonable, and adequate. If you remain in the Settlement Class, then you may object to any aspect of the Settlement, the Distribution Plan, Plaintiffs’ Interim Co-Lead Counsel’s request for attorneys’ fees and payment of expenses, or any other matters. *See* Section III.B below. **All objections must be made in accordance with the instructions set forth below, and they must be filed with the Court and served on or before February 11, 2021 or they will not be considered. *See* Section III.B below.**

Right to Exclude Yourself from the Settlement Class. The Court will exclude you from the Settlement Class if you make a written request for exclusion from the Settlement that is mailed to the Settlement Administrator (A.B. Data, Ltd.) at the address set forth in Section VIII and received no later than February 11, 2021. *See* Section III.C. **To be valid, the request for exclusion must comply with the requirements set forth in the Court’s Order dated August 5, 2020 (the “Notice Order”) and summarized in Section III.C below.** If you exclude yourself from the Settlement Class, you will not be entitled to share in the Net Settlement Fund.

Your decision to participate in or exclude yourself from this Settlement does not impact your ability to participate or exclude yourself from the ongoing Action, future settlements or future judgments.

I. BACKGROUND OF THE LITIGATION

A. The Nature of the Litigation

Plaintiffs allege that each Defendant, from January 1, 1999 through September 6, 2016 inclusive (the “Settlement Class Period”), conspired to dictate the price of silver during a daily, secret, and unregulated meeting (the “Silver Fix”). The Silver Fix was intended to determine the global benchmark price per ounce of silver (the “Fix price”) based on supply and demand fundamentals stemming from a competitive silver auction among the fixing members. However, Defendants allegedly capitalized on the lack of regulatory oversight and the private nature of the Silver Fix to facilitate Defendants’ agreement to manipulate and fix silver prices and the prices of Silver Instruments during the Settlement Class Period. Defendants allegedly transacted in price-fixed Silver Instruments with uninformed market participants like Plaintiffs and the Settlement Class. Defendants allegedly did so through several means of manipulation.

First, Defendants allegedly coordinated manipulative silver transactions in advance of the daily fixing call. Defendants’ alleged goal was to manipulate the Fix price in their desired direction. Both the Fixing members and other market maker Defendants allegedly conspired to manipulate the Silver Fix to benefit their silver trading positions.

Second, Defendants allegedly agreed to fix the “bid-ask spread” artificially wider when offering to buy or sell silver in the public silver market trading with Plaintiffs and the Settlement Class. Defendants allegedly effectuated the manipulation of spreads by sharing incoming and pending order flow and client information, including prices quoted to specific customers. Due to Defendants’ alleged quoting of artificial, anticompetitive spreads in the silver market, it is alleged that Plaintiffs and the Settlement Class were

¹ The Settlement Agreement is not a settlement with any other Defendant and thus is not dispositive of any of Plaintiffs’ claims against the remaining Defendants.

² Capitalized terms, not otherwise defined herein, shall have the same meanings assigned to them in the Settlement Agreement, as applicable.

systematically overcharged by Defendants' inflation of the "ask price," or the price at which Defendants offered to sell silver, and were underpaid by Defendants' suppression of the "bid price," or the price at which Defendants offered to buy silver.

Third, Defendants allegedly implemented coordinated trading strategies to manipulate and maintain the price of Silver Instruments at artificial levels during the Settlement Class Period. These alleged strategies included: (i) conspiring to execute large transactions during times when they knew the silver market was illiquid; (ii) execution of uneconomic buying of silver to provide artificial support for agreed-upon price levels; and (iii) withholding pricing information from the silver market by entering secret, unreported transactions with other co-conspiring Defendants. Defendants alleged aim was to profit from their illegitimate trading activity, despite the direct harm caused to Plaintiffs and the Settlement Class.

Plaintiffs have asserted legal claims under federal antitrust law for price fixing and unlawful restraint of trade; and the Commodity Exchange Act for price manipulation, manipulation by false reporting and fraud and deceit, aiding and abetting and principal-agent liability.

Plaintiffs and Plaintiffs' Interim Co-Lead Counsel believe that Settlement Class Members have been damaged by Defendants' conduct. Deutsche Bank does not agree with the allegations made by Plaintiffs, believes that it has meritorious defenses to Plaintiffs' allegations, and believes that certain of Plaintiffs' claims would have been rejected prior to trial, at trial (had Plaintiffs successfully certified a class and survived summary judgment motions), or on appeal. As a result, Deutsche Bank believes Settlement Class Members would have received nothing if the litigation had continued to trial.

The Court has not decided for or against Plaintiffs or Deutsche Bank. Instead, Plaintiffs' Interim Co-Lead Counsel engaged in negotiations with Deutsche Bank to reach a negotiated resolution of the claims against Deutsche Bank in this Action. The Settlement allows Plaintiffs and Deutsche Bank to avoid the risks and costs of lengthy litigation and the uncertainty of pre-trial proceedings, a trial, and appeals. If approved, the Settlement would permit eligible Settlement Class Members, who file timely and valid Claim Forms, to receive compensation, rather than risk ultimately receiving nothing. Plaintiffs and Plaintiffs' Interim Co-Lead Counsel believe the Settlement is in the best interest of all Settlement Class Members.

Deutsche Bank has paid into escrow a total of \$38 million (the "Settlement Fund") in cash for the benefit of the proposed Settlement Class. If the Settlement is finally approved, the Settlement Fund, plus interest earned from the date it was established, less any Taxes, any Notice and Administration Costs, any Court-awarded attorneys' fees, litigation costs and expenses, and service awards for Plaintiffs, and any other costs or fees approved by the Court (the "Net Settlement Fund"), will be divided among all Settlement Class Members who file valid Claim Forms.

If the Settlement is finally approved, the Action will conclude against Deutsche Bank, and Deutsche Bank will be released from claims concerning this lawsuit, as described more fully below. If the Settlement is not approved, Deutsche Bank will remain in the Action, and Plaintiffs will continue to pursue their claims against Deutsche Bank.

B. Procedural History

On October 14, 2014, the United States Judicial Panel on Multidistrict Litigation issued a Transfer Order consolidating similar actions pertaining to the prices of silver and silver derivatives before Judge Caproni in the Southern District of New York. ECF No. 1. The Court issued an Order consolidating three actions from the Southern District of New York and one action from the Eastern District of New York. ECF No. 4. On November 25, 2014, the Court appointed Lowey Dannenberg, P.C.³ and Grant & Eisenhofer P.A. as interim class co-lead counsel. ECF No. 17.

On January 26, 2015, Plaintiffs Norman Bailey, Robert Ceru, Christopher DePaoli, John Hayes, Laurence Hughes, KPFF Investment, Inc. f/k/a KP Investments, Inc., Kevin Maher, Eric Nalven, J. Scott Nicholson, and Don Tran filed the consolidated amended class action complaint in this Action against Deutsche Bank and The London Silver Market Fixing, Ltd., HSBC, The Bank of Nova Scotia, and UBS.⁴ ECF No. 34. On March 27, 2015, Defendants filed a motion to dismiss the consolidated amended class action complaint. ECF Nos. 56-59.

Thereafter, on April 17, 2015, Plaintiffs filed a second consolidated amended class action complaint, adding Sherman Act claims for price-fixing and bid rigging and a claim for manipulation by false reporting and fraud and deceit in violation of the Commodity Exchange Act. ECF No. 63. On May 29, 2015, UBS filed an individual motion to dismiss and the remaining Defendants filed a joint motion to dismiss the second consolidated amended class action complaint. ECF Nos. 73-74; 75-77. Plaintiffs filed their opposition to Defendants' motions on July 13, 2015. ECF Nos. 83-84; 87. UBS and Defendants filed their reply memoranda on August 10, 2015. ECF Nos. 96-97. On September 6, 2016, Plaintiffs and Deutsche Bank entered into the Settlement. On October 3, 2016, the Court granted UBS's motion to dismiss and granted the Fixing Defendants' motion to dismiss in part, but held that Plaintiffs' antitrust claims for price fixing and unlawful restraint of trade, and Plaintiffs' Commodity Exchange Act claims for price manipulation, manipulation by false reporting and fraud and deceit, aiding and abetting, and principal-agent liability could proceed. ECF No. 151. The Court reduced the litigation class period for Plaintiffs' remaining claims from the Settlement Class Period to January 1, 2007 through December 31, 2013. *Id.* The Court directed Plaintiffs to file a letter to show good cause for leave to replead within 14 days. *Id.* The Court extended the amendment deadline to November 17, 2016, due to Plaintiffs' recent receipt of cooperation

³ Lowey Dannenberg, P.C. was formerly known as Lowey Dannenberg Cohen & Hart, P.C.

⁴ On September 17, 2019, Plaintiffs Robert Ceru and Eric Nalven filed notices of voluntary withdrawal. ECF Nos. 431-32. On June 25, 2020, Plaintiff Norman Bailey filed a notice of voluntary withdrawal. ECF No. 448.

materials from Deutsche Bank. ECF Nos. 152-53. On October 17, 2016, Plaintiffs moved for preliminary approval of the Settlement, which the Court granted on November 23, 2016. ECF Nos. 154-57, 165-66.

On June 16, 2017, Plaintiffs filed a third consolidated amended class action complaint, adding Defendants Barclays Bank PLC (“Barclays”), BNP Paribas Fortis S.A./N.V. (“BNP Paribas”), Standard Chartered Bank (“Standard Chartered”), and Bank of America Corporation, Bank of America, N.A. and its subsidiary unit Merrill Lynch, Pierce, Fenner & Smith Inc. (together, “BAML”). ECF No. 258. Defendants filed a joint motion to dismiss in September 2017. ECF Nos. 302, 303, 306, 308, 316. Plaintiffs filed their opposition to Defendants’ joint motion to dismiss on December 5, 2017. ECF No. 336. Defendants filed their joint reply memoranda on December 20, 2017. ECF Nos. 338-41. On July 25, 2018, the Court granted the Non-Fixing Banks’ motion to dismiss Plaintiffs’ third consolidated amended class action complaint, dismissing Plaintiffs’ claims against Barclays, Standard Chartered, BNP Paribas, BAML, and UBS. Plaintiffs’ claims against non-settling Fixing Banks HSBC and Bank of Nova Scotia remained. ECF No. 363.

On May 24, 2019, the Court entered an amended fact discovery schedule that set a July 31, 2020 fact discovery completion deadline. ECF No. 420. On February 19, 2020, the Court amended the discovery schedule and set a December 11, 2020 fact discovery completion deadline and a Pretrial Conference date of December 18, 2020. ECF No. 440. In light of the COVID-19 pandemic in 2020, the Court entered a series of amended fact discovery schedules that adjourned the date for the commencement of depositions and the fact discovery completion deadline. ECF Nos. 443, 445, 447.

C. The Definition of the Settlement Class

In the Preliminary Approval Order, the Court preliminarily approved the following Settlement Class, defined as:

All persons or entities that transacted in U.S.-Related Transactions in or on any over-the-counter market (“OTC”) or exchange in physical silver or in a derivative instrument in which silver is the underlying reference asset (collectively, “Silver Instruments”), at any time from January 1, 1999 through the date of this Settlement Agreement.

“US-Related Transaction” means any transaction in a Silver Instrument (a) by any person or entity domiciled in the U.S. or its territories, or (b) by any person or entity domiciled outside the U.S. or its territories but conducted, in whole or in part, in the U.S. or its territories.

The Preliminary Approval Order adds that, “Excluded from the Settlement Class are Defendants, and their officers, directors, management, employees, subsidiaries, or affiliates. Also excluded is the Judge presiding over this action, his or her law clerks, spouse, and any person within the third degree of relationship living in the Judge’s household and the spouse of such a person. Also excluded are the DB Released Parties; and any Class Member who files a timely and valid request for exclusion.”

If you are not sure whether you are included in the Class, you can ask for free help. You can call toll-free 1-800-254-2939 (if calling from outside the United States or Canada, call 1-414-961-6577) or visit www.SilverFixSettlement.com for more information.

II. SUMMARY OF THE PROPOSED SETTLEMENT

A. Settlement with Deutsche Bank

On behalf of the Settlement Class, Plaintiffs entered into the Settlement Agreement with Deutsche Bank on September 6, 2016. The following description of the proposed Settlement is only a summary. This description and this Notice are qualified in their entirety by the Settlement Agreement which is on file with the Court at the address indicated in this Notice and is available on the official website for the Settlement, at www.SilverFixSettlement.com (the “Settlement Website”). In the event of any conflict between the Settlement Agreement and this Notice, the terms of the Settlement Agreement shall control.

1. Deutsche Bank’s Payments for the Benefit of the Settlement Class

a. No Right to Reversion

The Settlement Agreement does not provide Deutsche Bank with a right of reversion. That is, no matter how many Settlement Class Members fail to file a Claim Form or choose to opt-out, if the Settlement is not terminated and is finally approved by the Court, none of the Settlement monies will revert to Deutsche Bank. This is not a claims-made settlement; there will be no reversion.

b. Deutsche Bank’s Potential Right To Termination

Section 21 of the Settlement Agreement describes Deutsche Bank’s right to terminate if certain events occur. With respect to each such event, Deutsche Bank has the right, but not the obligation, to determine to exercise, in its sole discretion, its right to terminate if the event occurs.

c. Distribution Plan

The Distribution Plan is available for review on the Settlement Website at www.SilverFixSettlement.com. Changes, if any, to the Distribution Plan based on newly available data or information will be promptly posted on the Settlement Website. Please see the Settlement Website for the most up-to-date information about the Distribution Plan. Members of the Settlement Class are strongly encouraged to review the Settlement Website for any changes to the Distribution Plan.

d. Changes or Further Orders by the Court

Any change by the Court of the Distribution Plan, the time and place of the Fairness Hearing, or any other matter, and all further orders or requirements by the Court will be posted on the Settlement Website at www.SilverFixSettlement.com as soon as practicable.

It is important that you refer to the Settlement Website as no other notice may be published of such changes.

2. The Release and Covenant Not to Sue under the Settlement Agreement

IF YOU HAVE NOT VALIDLY REQUESTED TO BE EXCLUDED FROM THE SETTLEMENT CLASS, WHEN THE SETTLEMENT BECOMES FINAL YOU WILL BE RELEASING THE DB RELEASED PARTIES FROM THE CLAIMS DESCRIBED BELOW, AND YOU WILL BE BOUND BY THE RELEASES IN THE SETTLEMENT AGREEMENT INCLUDING THE COVENANT NOT TO SUE THE DB RELEASED PARTIES—EVEN IF YOU DO NOT FILE A PROOF OF CLAIM AND RELEASE.

Unless you exclude yourself, you remain a Settlement Class Member. That means you cannot sue, continue to sue, assist a third-party in suing, or be part of any other lawsuit about the Released Claims in this Action against Deutsche Bank or any of the DB Released Parties. Upon the Effective Date, the Plaintiff Releasing Parties shall release and be deemed to release and forever discharge and shall be forever enjoined from prosecuting the Released Claims against the DB Released Parties, regardless of whether such Plaintiff Releasing Party executes and delivers a Claim Form.

The capitalized terms used in this paragraph are defined in the Settlement Agreement, Preliminary Approval Order, or this Notice. For easy reference, certain of these terms are copied below:

- “DB Released Parties” means Deutsche Bank, as well as their former and current parents, subsidiaries, affiliates, attorneys, and their former and current officers, directors, employees, and agents thereof.
- “Plaintiff Releasing Parties” means Representative Plaintiffs and Settling Class Members on behalf of themselves and (as applicable) their heirs, executors, administrators, agents, attorneys, members, trustees, participants, and beneficiaries, and their respective predecessors, successors, representatives, principals, and assigns.
- “Released Claims” or “Plaintiff Released Claims” means any and all manner of claims, including Unknown Claims, causes of action, cross-claims, counter-claims, charges, liabilities, demands, judgments, suits, obligations, debts, setoffs, rights of recovery, or liabilities for any obligations of any kind whatsoever (however denominated), whether class or individual, in law or equity or arising under constitution, statute, regulation, ordinance, contract, or otherwise in nature, for fees, costs, penalties, fines, debts, expenses, attorneys’ fees, and damages, whenever incurred, and liabilities of any nature whatsoever (including joint and several), known or unknown, suspected or unsuspected, asserted or unasserted, which any Class Plaintiffs or Class Members ever had, now has, or hereafter can, shall or may have, representatively, derivatively or in any other capacity, against the DB Released Parties arising from or relating in any way to conduct alleged in the Action or that could have been alleged in the Action against the DB Released Parties, regardless of the source of law or other authority relied upon, concerning U.S.-Related Transactions in any Silver Instrument at any time from January 1, 1999 through the date of the Settlement Agreement. The definition of “Plaintiff Released Claims” is intended to have the broadest possible application, but, for the avoidance of doubt, Plaintiff Released Claims does not include claims that arise exclusively under foreign law and that relate to transactions in Silver Instruments for which irrevocable liability was incurred, or title was passed, entirely outside the United States.

You are automatically a member of a Settlement Class if you fit the Settlement Class description. However, if you do not submit a timely and valid Claim Form, you will not receive any payment from the Settlement. Unless you exclude yourself from the Settlement Class, you will be bound by past and any future Court rulings, including rulings on the Settlement and Released Claims. Unless you exclude yourself from the Settlement Class, you will not be able to start a lawsuit, continue with a lawsuit, or be a part of any other lawsuit against Deutsche Bank or any of the other DB Released Parties on the basis of the Released Claims.

The Settlement Agreement does not settle or compromise any claims other than those set out therein. All rights of the Plaintiffs or any Settlement Class Member against any person or entity other than the parties released in the Settlement Agreement are specifically reserved by the Plaintiffs and the Class Members. Your decision to participate in or exclude yourself from this Settlement does not impact your ability to participate or exclude yourself from the ongoing Action, future settlements or future judgments.

III. YOUR OPTIONS

A. Submit Claim Form for the Settlement Agreement

To participate in and receive your share of the Net Settlement Fund, you must submit a valid and timely Claim Form demonstrating that you are an Authorized Claimant as set forth in the Settlement Agreement. You may obtain and submit a Claim Form on the Settlement Website at www.SilverFixSettlement.com no later than March 1, 2021. Claim Forms, if sent by mail, must be addressed to the Settlement Administrator (*see* address in Section VIII below) and received no later than March 1, 2021. A copy of the Claim Form is attached hereto.

Any Settlement Class Member who fails to submit a Claim Form by March 1, 2021 in the manner specified will be barred from receiving any payment from the Net Settlement Fund (unless, by Order of the Court, an untimely Claim Form submitted by such member of the Settlement Class is approved), but will in all other respects be bound by the terms of the Settlement Agreement and by the Final Judgment entered on the Settlement Class' claims.

B. Object to the Settlement

If you are a Settlement Class Member and you do not exclude yourself, you can tell the Court what you think about the Settlement. You can object to all or any part of the Settlement, Distribution Plan, and/or application for attorneys' fees, reimbursement of litigation costs and expenses, and any service awards for Plaintiffs. You can give reasons why you think the Court should approve them or not. The Court will consider your views. You may also ask to intervene in the Action.

If you want to make an objection or intervene in the Action, you may enter an appearance in the Action, at your own expense, individually or through counsel of your own choice, by filing with the Clerk of Court a notice of appearance and your objection, and serving copies of your objection on Plaintiffs' Interim Co-Lead Counsel, and Deutsche Bank's Counsel by **February 11, 2021** to the following mailing addresses:

Vincent Briganti LOWEY DANNENBERG, P.C. 44 S. Broadway, Suite 1100 White Plains, NY 10601-2310	Robert Eisler GRANT & EISENHOFER P.A. 485 Lexington Avenue, 29th Floor New York, NY 10017	Robert W. Allen KIRKLAND & ELLIS, LLP 601 Lexington Ave. New York, NY 10022
<i>Plaintiffs' Interim Co-Lead Counsel</i>		<i>Counsel for Deutsche Bank</i>

Any Settlement Class Member who does not enter an appearance will be represented by Plaintiffs' Interim Co-Lead Counsel.

If you choose to object, you must file a written objection with the Clerk of the Court. You cannot file an objection by telephone or email. Your written objection must include a statement of the objection or motion to intervene, as well as the specific legal and factual reasons for each objection or motion to intervene, including all support that the objecting Settlement Class Member or the governmental entity wishes to bring to the Court's attention and all evidence the objecting Settlement Class Member or governmental entity wishes to introduce in support of his, her, or its objection or motion. The submission must contain: (i) a heading that refers to this Action by case name and case number (*In re London Silver Fixing, Ltd. Antitrust Litigation*, Nos. 14-md-02573 (VEC) (S.D.N.Y.), 14-mc-02573(VEC) (S.D.N.Y.)); (ii) a statement of the specific legal and factual basis for each objection or intervention argument, including whether the objection applies only to the objecting person, a specific subset of the Settlement Class, or the entire Settlement Class; (iii) a statement of whether the objecting or intervening person or entity intends to appear at the Fairness Hearing, either in person or through counsel and, if through counsel, a statement identifying that counsel by name, address, and telephone number; (iv) a description of any and all evidence the objecting person or entity may offer at the Fairness Hearing, including but not limited to the names, addresses, and expected testimony of any witnesses; all exhibits intended to be introduced at the Fairness Hearing; and documentary proof of the objecting person's membership in the Settlement Class; (v) a description of the Silver Instruments transactions entered into by the member of the Settlement Class that fall within the Settlement Class definition (including, for each transaction, the date, time and location of the transaction, the instrument type, direction (i.e., purchase or sale) of the transaction, the counterparty, any transaction identification numbers, the total amount transacted (in both ounces of silver and in U.S. Dollars); and (vi) a list of other cases in which the objector or intervenor or counsel for the objector or intervenor has appeared either as an objector or counsel for an objector in the last five years. Persons who have timely submitted a valid Request for Exclusion are not Settlement Class Members and are not entitled to object. All written objections must be signed by the Settlement Class Member (or his, her, or its legally authorized representative), even if the Settlement Class Member is represented by counsel.

If you do not timely and validly submit your objection, your views will not be considered by the Court or any court on appeal. Check the Settlement Website at www.SilverFixSettlement.com for updates on important dates and deadlines relating to the Settlement.

C. Request to be Excluded from the Settlement Class for the Settlement Agreements

You can exclude yourself by sending a written "Request for Exclusion." You cannot exclude yourself by telephone or email. Your written Request for Exclusion must contain: (a) the name, address, and telephone number of the Settlement Class Member; (b) a list of all trade names or business names that the Settlement Class Member requests to be excluded; (c) the name and case number of this Action (*In re London Silver Fixing, Ltd. Antitrust Litigation*, Nos. 14-md-02573 (VEC) (S.D.N.Y.), 14-mc-02573(VEC)

(S.D.N.Y.); (d) a statement certifying such person is a Settlement Class Member; (e) a description of the Silver Instruments transactions entered into by the Settlement Class Member that fall within the Settlement Class definition (including, for each transaction, the date, time and location of the transaction, the instrument type, direction (i.e., purchase or sale) of the transaction, the counterparty, any transaction identification numbers, the total amount transacted (in both ounces of silver and in U.S. Dollars)); and (f) a statement that "I/we hereby request that I/we be excluded from the Settlement Class." If you are unwilling or unable to provide a description of the Silver Instruments transactions, your Request for Exclusion must contain a short explanation as to why you are unwilling or unable to do so. The Court will decide on a case-by-case basis, depending on the strength of your explanation, whether your Request for Exclusion is effective despite the lack of disclosure.

A Request for Exclusion that does not include all of the foregoing information (or an explanation as to undisclosed transaction information), that does not contain the proper signature, that is sent to an address other than the one designated below, or that is not sent within the time specified shall be invalid and the person(s) filing such an invalid request shall be a Settlement Class Member and shall be bound by the Settlement, if approved.

Requests for exclusion from the Settlement Class for the Settlement Agreements must be sent by U.S. first class mail (preferably certified mail) (or, if sent from outside the U.S., by a service that provides for guaranteed delivery within five (5) or fewer calendar days of mailing) to the Settlement Administrator at:

London Silver Fixing, Ltd. Antitrust Settlement
EXCLUSIONS
P.O. Box 173001
Milwaukee, WI 53217

Requests for exclusion must be received no later than February 11, 2021.

If you submit a valid and timely Request for Exclusion in the manner set forth above, you will not be bound by the Settlement Agreement and can independently pursue claims you may have against Deutsche Bank at your own expense. You may also enter an appearance through an attorney if you so desire. However, if you exclude yourself from the Settlement Agreement, you will not be eligible to share in the Net Settlement Fund and shall have no rights under the Settlement. In addition, if you exclude yourself from the Settlement Class, you will not be entitled to object to the Settlement or to appear at the Fairness Hearing.

IV. PROOF OF CLAIM AND RELEASE

The Claim Form, which includes instructions on how and when to make a claim, is included with this Notice. You may also obtain a Claim Form or complete the online Claim Form on the Settlement Website at www.SilverFixSettlement.com or you may request that a Claim Form be mailed to you by calling the Settlement Administrator toll free at 1-800-254-2939 (if calling from outside the United States or Canada, call 1-414-961-6577). You should consider reading the Settlement Agreement and you should read the Claim Form carefully before submitting your Claim Form or determining another course of action.

V. ATTORNEYS' FEES AND COSTS

Settlement Class Members are not personally responsible for payment of attorneys' fees or expenses. As compensation for their time and their risk in prosecuting the litigation on a wholly contingent fee basis for over five years, Plaintiffs' Interim Co-Lead Counsel will ask the Court for an award of attorneys' fees in the amount of no more than 30% or eleven million four hundred thousand dollars (\$11,400,000) of the Settlement Fund, as a common fund; an award for unreimbursed litigation costs and expenses in the amount of no more than two million one hundred thousand dollars (\$2,100,000); plus interest on such attorneys' fees, costs and expenses at the same rate as the earnings in the Settlement Fund, accruing from the inception of the Settlement Fund until the attorneys' fees and Litigation Expenses are paid, all to be deducted from the Settlement Fund. Additionally, Plaintiffs' Interim Co-Lead Counsel may apply at the time of any application for distribution to qualifying members of the Settlement Class, for an award from the Settlement Fund of attorneys' fees for services performed and reimbursement of expenses incurred in connection with the administration of the Settlement Agreement after the date of the Fairness Hearing. Plaintiffs may seek reimbursement of their own expenses and compensation for their time devoted to this litigation in the aggregate amount to be determined by the Court and paid from the Settlement Fund. This amount constitutes the Incentive Award.

VI. FAIRNESS HEARING AND RIGHT TO OBJECT

The Court has scheduled a Fairness Hearing for April 8, 2021 at 10:00 A.M. to be held at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York, Courtroom 443. Given the current COVID-19 situation, the Court reserves the right to conduct the final fairness hearing remotely. At the Fairness Hearing, the Court will determine, among other things, if the proposed Settlement is fair, reasonable, and adequate. The Court will also consider Plaintiffs' Interim Co-Lead Counsel's request for attorneys' fees and reimbursement of litigation expenses.

The time and date of the Fairness Hearing may be continued from time to time without further notice and you are advised to confirm the time and location if you wish to attend; as soon as practicable after any change in the scheduled date and time, such change will be posted on the Settlement Website.

If you are a Settlement Class Member, you are entitled to appear, in person or through duly authorized attorneys, and to show cause why the Settlement or other applications should or should not be approved. However, if you wish to appear, you must submit a written statement, along with any materials you wish the Court to consider—see Section III.B above. This written statement must be received by the Court (at the address provided above) no later than February 11, 2021 or it will not be considered. Such materials must also be served on Plaintiffs' Interim Co-Lead Counsel and counsel of record for Deutsche Bank at the addresses set forth in Section III.B. by overnight mail or by hand or they will not be considered.

VII. CHANGE OF ADDRESS

If this Notice reached you at an address other than the one on the mailing label, or if your address changes, please enter your current information online at www.SilverFixSettlement.com, or send it to the Settlement Administrator at the address set forth in Section VIII below.

VIII. THE SETTLEMENT ADMINISTRATOR

The Court has appointed A.B. Data, Ltd. as the Settlement Administrator. Among other things, the Settlement Administrator is responsible for providing notice of the Settlement to the Settlement Class and processing Claim Forms. You may contact the Settlement Administrator through the Settlement Website, by telephone toll free at 1-800-254-2939 (if calling from outside the United States or Canada, call 1-414-961-6577), or by writing to the Settlement Administrator at the below address:

London Silver Fixing Settlement
c/o A.B. Data, Ltd.
P.O. Box 173103
Milwaukee, WI 53217

IX. ADDITIONAL INFORMATION

The Settlement Agreement and other important documents related to these Actions are available online at www.SilverFixSettlement.com and also available for review during normal business hours at the office of the Clerk of Court, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007-1312. If you have questions about this Notice, the procedure for registering, or the Settlement Agreements, you may contact Plaintiffs' Interim Co-Lead Counsel at the address listed in Section III.B.

DO NOT CONTACT THE DISTRICT COURT OR THE CLERK'S OFFICE REGARDING THIS NOTICE.

Dated: August 5, 2020

BY ORDER OF THE COURT.
Clerk of the United States District Court
Southern District of New York

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE LONDON SILVER FIXING, LTD. ANTITRUST LITIGATION

This Document Relates to:

ALL ACTIONS

14-MD-02573-VEC

14-MC-02573-VEC

The Honorable Valerie E. Caproni

PROOF OF CLAIM AND RELEASE

If you entered into a U.S.-Related Transaction¹ in or on any over-the-counter market (“OTC”) or exchange in physical silver or in a derivative instrument in which silver is the underlying reference asset (collectively, “Silver Instruments”), at any time from January 1, 1999 through September 6, 2016 (the “Settlement Class Period”), you may be entitled to receive a payment from a \$38 million settlement with Deutsche Bank in the class action case *In re London Silver Fixing, Ltd. Antitrust Litigation*, Nos. 14-md-02573-VEC, 14-mc-02573-VEC (S.D.N.Y). “U.S.-Related Transaction” means any transaction in a Silver Instrument: (a) by any person or entity domiciled in the U.S. or its territories, or (b) by any person or entity domiciled outside the U.S. or its territories but conducted, in whole or in part, in the U.S. or its territories. To be eligible to receive a payment from the Net Settlement Fund, you must electronically submit a Proof of Claim and Release along with the required data and/or information described below at the settlement website, www.SilverFixSettlement.com by 11:59 p.m. Eastern Time on March 1, 2021 or you must complete, sign, and mail this Proof of Claim and Release and necessary supporting documentation to the Settlement Administrator at the following address, to be received no later than March 1, 2021:

London Silver Fixing Settlement
c/o A.B. Data, Ltd.
P.O. Box 173103
Milwaukee, WI 53217

Do not submit your claim to the Court.

If you are a Settling Class Member who transacted in physical silver spot trades that are priced based on the Silver Fix price (“Physical Silver”) or in exchange-traded futures contracts, options contracts, swaps, and forwards in which silver is the underlying reference asset (“Silver Derivatives”) during the Settlement

¹ Unless otherwise defined herein, capitalized terms have the meaning assigned to them as in the Stipulation and Agreement of Settlement with Deutsche Bank.

Class Period, then by properly filling out, signing, and returning this Proof of Claim and Release and furnishing the required supporting documentation, you may be entitled to share in the proceeds from the Net Settlement Fund. Submission of this Proof of Claim and Release does not assure that you will share in any of the proceeds of the Net Settlement Fund. Your payment amount will be determined based on the Settlement Administrator's review of your Proof of Claim and Release and calculated pursuant to the Distribution Plan that the Court approves. The Distribution Plan will be available at www.SilverFixSettlement.com.

Separate Proofs of Claim and Release should be submitted for each separate legal entity. Conversely, a single Proof of Claim and Release should be submitted on behalf of only one legal entity. For all accounts you own or control, you must include the requested trade information for all transactions in Silver Instruments at any time between January 1, 1999 through and including September 6, 2016. If you omit needed documentation or information, your claim may be considered defective by the Settlement Administrator. If so, you will be notified of the defect and given an opportunity to cure by providing additional documentation or information.

If you qualify as a Settling Class Member and fail to submit a valid and timely Proof of Claim and Release pursuant to these instructions or fail to provide adequate documentation of your pertinent transactions, you may be precluded from recovery against the Net Settlement Fund. You will nevertheless be bound by the terms of any judgment entered in the Action whether or not you submit a Proof of Claim and Release.

It is important that you read the accompanying Notice of Proposed Class Action Settlement, April 8, 2021 Fairness Hearing Thereon and Class Members' Rights ("Notice") and the Stipulation and Agreement of Settlement with Deutsche Bank ("Settlement Agreement"), which are available at www.SilverFixSettlement.com. By signing and submitting this Proof of Claim and Release, you will be certifying that you have read the Notice, including the terms of the Release and Covenant Not to Sue described in the Notice and provided for in the Settlement Agreement.

The completed Proof of Claim and Release and the information submitted therewith will be treated as confidential and will be used solely for purposes of administering the Settlement. Knowingly submitting inaccurate or incomplete information may subject you to civil or criminal penalties.

You should be aware that it will take a significant amount of time to process fully all of the Proof of Claim and Release forms and to administer the Settlement. This work will be completed as promptly as time permits, given the need to investigate and tabulate each Proof of Claim and Release. Please notify the Settlement Administrator of any change of address.

ACCURATE CLAIMS PROCESSING TAKES A SIGNIFICANT AMOUNT OF TIME. THANK YOU FOR YOUR PATIENCE.

IF YOU HAVE ANY QUESTIONS CONCERNING THIS PROOF OF CLAIM AND RELEASE, WRITE TO, CALL, OR GO ON-LINE AT:

London Silver Fixing Settlement
c/o A.B. Data, Ltd.
P.O. Box 173103
Milwaukee, WI 53217
www.SilverFixSettlement.com
1-800-254-2939 or 1-414-961-6577
info@SilverFixSettlement.com

DO NOT CONTACT THE COURT IF YOU HAVE QUESTIONS CONCERNING THIS PROOF OF CLAIM AND RELEASE.

FOR OFFICIAL USE ONLY

London Silver Fixing Settlement
PROOF OF CLAIM AND RELEASE
 Please print or type

**MUST BE ELECTRONICALLY
 SUBMITTED OR RECEIVED NO LATER
 THAN MARCH 1, 2021**

DETAILED CLAIM SUBMISSION INSTRUCTIONS ARE AVAILABLE ON THE SETTLEMENT WEBSITE WWW.SILVERFIXSETTLEMENT.COM

ITEM 1—CLAIMANT IDENTIFICATION

Please provide the following information if you or the entity for which you are executing the claim (collectively, “you”) transacted in or held Physical Silver or Silver Derivatives:

Claimant’s First Name	MI	Claimant’s Last Name
<input type="text"/>	<input type="text"/>	<input type="text"/>

Co-Claimant’s First Name	MI	Co-Claimant’s Last Name
<input type="text"/>	<input type="text"/>	<input type="text"/>

Entity Name (if Claimant is not an individual)

Representative or Custodian Name (if different from Claimant[s] listed above)

Address 1 (street name and number)

Address 2 (apartment, unit, or box number)

City	State	ZIP Code/Postal Code
<input type="text"/>	<input type="text"/>	<input type="text"/>

Province/Region (if outside U.S.)

Country

Claimant Tax ID (For most U.S. Claimants, this is their individual Social Security number, employer identification number, or taxpayer identification number. For non-U.S. Claimants, enter a comparable government-issued identification number.)

Telephone Number (home or cell)	Telephone Number (work)
<input type="text"/>	<input type="text"/>

Item 3 - Proof of Qualifying Transactions

Please describe below all of your transactions in Physical Silver or Silver Derivatives between January 1, 1999 and September 6, 2016, inclusive. Please also submit the supporting documentation for your transactions in Physical Silver or Silver Derivatives. The supporting document should also allow the Settlement Administrator to determine whether a transaction in Physical Silver or Silver Derivatives was a U.S.-Related Transactions.

You must provide proof for each and every transaction in Physical Silver or Silver Derivatives, between January 1, 1999 and September 6, 2016, regardless of whether your transaction resulted in a gain or a loss.

If necessary documents are not in your possession, please obtain them or their equivalent from your broker or tax advisor or other sources if it is possible for you to do so.

The Settlement Administrator will determine your Settlement Transaction Volume (as set forth in the Distribution Plan) by analyzing your transactions in Physical Silver or Silver Derivatives.

Your Physical Silver or Silver Derivatives transaction data should always include trade dates. Do not offset opening and closing transactions or provide net position or trading information. It is important that you supply the information requested to the fullest extent possible.

For all Physical Silver or Silver Derivatives, including those traded on a futures exchange (Chicago Board of Trade, Commodity Exchange, Inc., NYSE LIFFE, CME, COMEX), please provide documents reflecting such transactions including daily and monthly brokerage statements or trade confirmations. For all transactions, you must also provide proof you entered into the transaction while you were domiciled in the United States or its territories, or, if domiciled outside the United States or its territories, the trade was transacted by a Person from a location within the United States or its territories.

If you have any of the below transaction information in an electronic form, you are strongly encouraged to submit the information electronically. The following formats are acceptable: ASCII, MS Excel, MS Access, dBase, and electronic filing templates can be found at the Settlement Website, www.SilverFixSettlement.com.

PHYSICAL SILVER

During the Settlement Class Period, for a long or short position, please list each U.S.-Related Transaction in Physical Silver:

Transaction Date	Long or Short Position in Silver?	Total Transaction Amount²	Currency of Transaction	Ounces of Silver Transacted	Location of Transaction	Name of Counterparty	Name of Broker (if applicable)

² In U.S. dollars or foreign currency (if applicable).

SILVER DERIVATIVES

Silver Forward Contracts

During the Settlement Class Period, provide the following information for each U.S.-Related Transaction in a Silver forward contract:

Transaction Date	Long or Short Position in Silver?	Total Transaction Amount	Currency of Transaction	Ounces of Silver Transacted	Location of Transaction	Name of Counterparty	Name of Broker (if applicable)	Settlement Date/ Delivery Date

Silver Futures Contracts

During the Settlement Class Period, provide the following information for each U.S.-Related Transaction in a Silver Derivative futures contract:

Transaction Date	Long or Short Position in Silver?	Total Transaction Amount	Currency of Transaction	Ounces of Silver Transacted	Location of Transaction	Exchange	Name of Broker (if applicable)	Settlement Date/ Delivery Date

Silver Options Contracts

During the Settlement Class Period, please provide the following information for each U.S.-Related Transaction of an option on a Silver Instrument:

Transaction Date	Option for Long or Short Silver Position?	Total Transaction Amount	Currency of Transaction	Ounces of Silver To Be Transacted	Location of Transaction	Name of Counterparty	Name of Broker (if applicable)

Silver Swaps

During the Settlement Class Period, provide the following information for each U.S.-Related Transaction in Silver-based swaps. Please only enter legs of the transaction based on Silver:

Transaction Date	Long or Short Position in Silver?	Total Transaction Amount	Currency of Transaction	Supplier or Receiver of Silver?	Payer or Receiver of fixed rate?	Ounces of Silver Transacted	Location of Transaction	Name of Counterparty	Name of Broker (if applicable)

If you have any additional U.S.-Related Transactions in Silver Instruments that you believe do not fit in any of the above categories, please list below and supply supporting documentation:

It is important that you accurately disclose all transactions in Silver Instruments during the Settlement Class Period. Interim Co-Lead Counsel and the Settlement Administrator reserve the right to seek further information from you regarding your Proof of Claim and Release.

Item 4 – Consent, Certification and Signature

BY SIGNING AND SUBMITTING THIS PROOF OF CLAIM AND RELEASE, CLAIMANT OR CLAIMANT’S AUTHORIZED REPRESENTATIVE CERTIFIES ON CLAIMANT’S BEHALF AS FOLLOWS

I (we) expressly consent to the release to the Settlement Administrator of any and all documents reflecting my (our) transactions in Physical Silver or Silver Derivatives that may be obtained from third parties, including, but not limited to, my (our) brokerage firm(s), my (our) FCMs, the CME, NYSE LIFFE, CBOT, COMEX, or any other source with this transaction information.

By executing this Proof of Claim and Release, I (we) hereby permit the Settlement Administrator to request from my (our) brokerage firm(s), my (our) FCMs, the CME, NYSE LIFFE, CBOT, COMEX, or any other source with this transaction information relevant information about my (our) transactions in Physical Silver or Silver Derivatives in order to compute any payment that may be due to me (us) from the Net Settlement Fund. I (we) consent to the disclosure of information relating my (our) transactions in Physical Silver or Silver Derivatives and waive any protections provided by any applicable bank secrecy or data privacy laws (whether foreign or domestic), or any similar confidentiality protections with respect to information and transaction data relating to my (our) trades for use in the claims administration process.

I (we) (for myself (ourselves) in the event of an individual claim, and for the Claimant in the event of any other claim) certify that reasonable efforts have been made to locate all information requested in this Proof of Claim and Release above and that all information supplied in connection with this Proof of Claim and Release is true, correct, and complete.

I (we) (for myself (ourselves) in the event of an individual claim, and for the Claimant in the event of any other claim) certify that I (we) have not submitted any other claim covering the same transactions of Physical Silver or Silver Derivatives during the Settlement Class Period and know of no other person having done so on my (our) behalf.

I (we) hereby warrant and represent that I (we) have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any matter released pursuant to the release or any other part or portion thereof.

I (we) understand that the information provided herein is subject to verification, and I (we) (for myself (ourselves) in the event of an individual claim, and for the Claimant in the event of any other claim) agree to cooperate in any such verification, including by furnishing additional information to support this claim and by assisting the Settlement Administrator if requested to do so.

I (we) understand that the Settlement Administrator will determine the adequacy of the Claimant’s Proof of Claim and Release and supporting documentation.

I (we) have read the Notice and Proof of Claim and Release, including the descriptions of the Release and Covenant Not to Sue provided for in the Settlement Agreement.

I (we) am (are) a Settlement Class Member and am (are) not one of the individuals or entities excluded from the Settlement Class.

I (we) have not submitted a Request for Exclusion

I (we) (for myself (ourselves) in the event of an individual claim, and for the Claimant in the event of any other claim) consent to the jurisdiction of the United States District Court for the Southern District of New York (the “Court”) with respect to all matters concerning this Proof of Claim and Release including, without limitation, any efforts to enforce the terms of the Settlement Agreement or any order or judgment of the Court.

I (we) (for myself (ourselves) in the event of an individual claim, and for the Claimant in the event of any other claim) agree to the terms of the Settlement as set forth in the Settlement Agreement and acknowledge being bound by and subject to the terms of any order or judgment that may be entered in the Action, including the Final Approval Order and Judgment. I (we) may obtain a copy of the Settlement Agreement at www.SilverFixSettlement.com.

I (we) (for myself (ourselves) in the event of an individual claim, and for the Claimant in the event of any other claim) acknowledge that this Proof of Claim and Release constitutes a release and covenant not to sue in conformity with Section 12 of the Settlement Agreement in order to receive the appropriate share, if any, of the Settlement Fund. I (we) (for myself (ourselves) in the event of an individual claim, and for the Claimant in the event of any other claim) agree that the submission of this Proof of Claim and Release constitutes a full release of and covenant not to sue on the Released Claims against the DB Released Parties as set forth in the Settlement Agreement and at the end of this Proof of Claim and Release.

I (we) acknowledge that, as of the Effective Date of the Settlement, pursuant to the terms set forth in the Settlement Agreement, and by operation of law and the Judgment, I (we) shall be deemed to release and forever discharge and shall be forever enjoined from prosecuting the Released Claims against the DB Released Parties.

I (we) (for myself (ourselves) in the event of an individual claim, and for the Claimant in the event of any other claim) certify that I (we) am (are) not subject to backup withholding under the provisions of Section 3406(a)(1)(C) of the Internal Revenue Code of 1986, as amended, because: (a) the Claimant(s) is (are) exempt from backup withholding; or (b) the Claimant(s) has (have) not been notified by the Internal Revenue Service (the “I.R.S.”) that the Claimant(s) is (are) subject to backup withholding as a result of a failure to report all interest or dividends; or (c) the I.R.S. has notified the Claimant(s) that the Claimant(s) is (are) no longer subject to backup withholding.

I (we) declare or affirm under penalty of perjury that the foregoing statements and the documents and information attached hereto, including the Social Security or Employer Identification Number shown on this Proof of Claim and Release, are true, correct and complete, and that I (we) agree to the above releases and covenants not to sue. I understand that the withholding or misrepresentation of any information described herein may constitute a criminal offense subject to penalties under the law.

This Proof of Claim and Release was executed this _____ day of _____, 20_____, in _____, _____
(City/Province) (State/Country)

Signature of Claimant(s)

Signature of Authorized Representative (if any)

Type or Print Name of Claimant(s)

Type or Print Name of Authorized Representative (if any)

Capacity of Authorized Representative (e.g., President, Trustee, Custodian, etc.).
If you are acting for an entity, please submit proof of your authority (e.g., corporate resolution, trust agreement, etc.).

REMINDER: YOUR CLAIM FORM AND REQUIRED DATA MUST BE SUBMITTED ONLINE BY 11:59 P.M. EASTERN TIME ON MARCH 1, 2021 OR MAILED AND RECEIVED BY THE SETTLEMENT ADMINISTRATOR NO LATER THAN MARCH 1, 2021.

EXHIBIT B

Lowey Dannenberg, P.C. and Grant & Eisenhofer P.A. Announce Settlement for Those Who Have Transacted in Silver Instruments between January 1, 1999 through September 6, 2016

NEWS PROVIDED BY

Lowey Dannenberg, P.C.; Grant & Eisenhofer P.A. →

Sep 08, 2020, 16:00 ET

WHITE PLAINS, N.Y., Sept. 8, 2020 /PRNewswire/ --

SUMMARY NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

If you entered into a U.S.-Related Transaction in or on any over-the-counter market or exchange in physical silver or in a derivative instrument in which silver is the underlying reference asset from January 1, 1999 through and including September 6, 2016 ("Settlement Class Period"), your rights may be affected by a pending class action settlement and you may be entitled to a portion of the settlement fund.

This Summary Notice is to alert you to a proposed settlement totaling \$38,000,000.00 reached with Deutsche Bank AG, Deutsche Bank Americas Holding Corporation, DB U.S. Financial Markets Holding Corporation, Deutsche Bank Securities, Inc., Deutsche Bank Trust Corporation, Deutsche Bank Trust Company Americas, Deutsche Bank AG New York Branch, and their subsidiaries and affiliates (collectively "Deutsche Bank"). Deutsche Bank denies any liability, fault, or wrongdoing of any kind in connection with the allegations in the Action. By entering

into the proposed settlement, Deutsche Bank has not admitted to any such liability, fault, or wrongdoing, and nothing in the Settlement Agreement or this Notice shall be construed as such an admission.

The United States District Court for the Southern District of New York (the "Court") authorized this Notice. The Court has appointed the lawyers listed below to represent the Settlement Class in this Action:

Vincent Briganti	Robert Eisler
Lowey Dannenberg, P.C.	Grant & Eisenhofer P.A.
44 South Broadway, Suite 1100	485 Lexington Avenue, 29th Floor
White Plains, NY 10601	New York, NY 10017
Telephone: (914) 733-7221	Telephone: (646) 722-8500
vbriganti@lowey.com	reisler@gelaw.com

Who Is a Member of the Settlement Class?

Subject to certain exceptions, the proposed Settlement Class consists of all persons and entities who or which entered into a U.S.-Related Transaction (1) in or on any over-the-counter market or exchange in physical silver or (2) in a derivative instrument in which silver is the underlying reference asset (collectively, "Silver Instruments") during the Class Period.

"U.S.-Related Transaction" means any transaction in a Silver Instrument: (a) by any person or entity domiciled in the U.S. or its territories; or (b) by any person or entity domiciled outside the U.S. or its territories but conducted, in whole or in part, in the U.S. or its territories.

The other capitalized terms used in this Summary Notice are defined in the detailed Notice of Proposed Class Action Settlement, April 8, 2021 Fairness Hearing Thereon and Class Members' Rights ("Notice") and the Settlement Agreement, which are available at www.SilverFixSettlement.com.

If you are not sure if you are included in the Settlement Class, you can get more information, including the detailed Notice, at www.SilverFixSettlement.com or by calling toll-free 1-800-254-2939 (if calling from outside the United States or Canada, call 1-414-961-6577).

What Is This Lawsuit About and What Does the Settlement Provide?

Plaintiffs allege that each Defendant, including Deutsche Bank, conspired to dictate the price of silver during a daily, secret, and unregulated meeting (the "Silver Fix"). Defendants are alleged to have coordinated manipulative silver transactions in advance of the daily Silver Fix call. The alleged goal of Defendants was to manipulate the Fix price in their desired direction. Defendants allegedly agreed to fix the "bid-ask spread" artificially wider when offering to buy or sell silver in the public silver market trading with Plaintiffs and the Class. Defendants also allegedly implemented coordinated trading strategies to manipulate and maintain the price of Silver Instruments at artificial levels during the Class Period. Plaintiffs have asserted legal claims under the federal antitrust law, Commodity Exchange Act, and common law.

To settle the claims in this lawsuit and without admitting any liability, fault, or wrongdoing, Deutsche Bank has agreed to pay a total of \$38 million (the "Settlement Fund") in cash for the benefit of the proposed Settlement Class. If the Settlement is approved, the Settlement Fund, plus interest earned from the date it was established, less any Taxes, any Notice and Administration Costs, any Court-awarded attorneys' fees, payment of litigation costs and expenses, and service awards for Plaintiffs, and any other costs or fees approved by the Court (the "Net Settlement Fund") will be divided among all Settlement Class Members who file valid Proofs of Claim and Release.

Will I Get a Payment?

If you are a member of the Settlement Class and do not opt out, you will be eligible for a payment from the Net Settlement Fund if you file a Proof of Claim and Release ("Claim Form"). You also may obtain more information at www.SilverFixSettlement.com or by calling toll-free 1-800-254-2939 (if calling from outside the United States or Canada, call 1-414-961-6577).

Claim Forms must be submitted online at www.SilverFixSettlement.com on or before 11:59 p.m. Eastern time on **March 1, 2021 OR** mailed to and received by the Settlement Administrator, A.B. Data by **March 1, 2021**.

What Are My Rights?

If you are a member of the Settlement Class and do not opt out, you will release certain legal rights against Deutsche Bank and the DB Released Parties, as explained in the detailed Notice and Settlement Agreement, which are available at www.SilverFixSettlement.com. If you do not want to take part in the Settlement, you must opt out by **February 11, 2021**. You may object to the Settlement, Distribution Plan, and/or application for an award of attorneys' fees, payment of litigation costs and expenses, and/or service awards for Plaintiffs. If you want to object, you must do so by **February 11, 2021**. Information on how to opt out or object is contained in the detailed Notice, which is available at www.SilverFixSettlement.com.

When Is the Fairness Hearing?

The Court will hold a hearing at the United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 443, New York, NY 10007, on **April 8, 2021 at 10:00 A.M.** to consider whether to finally approve this Settlement, Distribution Plan, and application for an award of attorneys' fees, payment of litigation costs and expenses, and any service awards for Plaintiffs. Given the current COVID-19 situation, the Court reserves the right to conduct the final fairness hearing remotely. You or your lawyer may ask to appear and speak at the hearing at your own expense, but you do not have to. Any changes to the time and place of the Fairness Hearing, or other deadlines, will be posted to www.SilverFixSettlement.com as soon as practicable.

For more information, call toll-free 1-800-254-2939 (if calling from outside the United States or Canada, call 1-414-961-6577) or visit www.SilverFixSettlement.com.

***** Please do not call the Court or the Clerk of the Court for information about the Settlement. *****

SOURCE Lowey Dannenberg, P.C.; Grant & Eisenhofer P.A.

EXHIBIT C

SUMMARY NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

If you entered into a U.S.-Related Transaction in or on any over-the-counter market or exchange in physical silver or in a derivative instrument in which silver is the underlying reference asset from January 1, 1999 through and including September 6, 2016 (“Settlement Class Period”), your rights may be affected by a pending class action settlement and you may be entitled to a portion of the settlement fund.

This Summary Notice is to alert you to a proposed settlement totaling \$38,000,000.00 reached with Deutsche Bank AG, Deutsche Bank Americas Holding Corporation, DB U.S. Financial Markets Holding Corporation, Deutsche Bank Securities, Inc., Deutsche Bank Trust Corporation, Deutsche Bank Trust Company Americas, Deutsche Bank AG New York Branch, and their subsidiaries and affiliates (collectively “Deutsche Bank”). Deutsche Bank denies any liability, fault, or wrongdoing of any kind in connection with the allegations in the Action. By entering into the proposed settlement, Deutsche Bank has not admitted to any such liability, fault, or wrongdoing, and nothing in the Settlement Agreement or this Notice shall be construed as such an admission.

The United States District Court for the Southern District of New York (the “Court”) authorized this Notice. The Court has appointed the lawyers listed below to represent the Settlement Class in this Action:

Vincent Briganti
LOWEY DANNENBERG, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601
Telephone: (914) 733-7221
vbriganti@lowey.com

Robert Eisler
GRANT & EISENHOFER P.A.
485 Lexington Avenue, 29th Floor
New York, NY 10017
Telephone: (646) 722-8500
reisler@gelaw.com

Who Is a Member of the Settlement Class?

Subject to certain exceptions, the proposed Settlement Class consists of all persons and entities who or which entered into a U.S.-Related Transaction (1) in or on any over-the-counter market or exchange in physical silver or (2) in a derivative instrument in which silver is the underlying reference asset (collectively, “Silver Instruments”) during the Class Period.

“U.S.-Related Transaction” means any transaction in a Silver Instrument: (a) by any person or entity domiciled in the U.S. or its territories; or (b) by any person or entity domiciled outside the U.S. or its territories but conducted, in whole or in part, in the U.S. or its territories.

The other capitalized terms used in this Summary Notice are defined in the detailed Notice of Proposed Class Action Settlement, April 8, 2021 Fairness Hearing Thereon and Class Members’ Rights (“Notice”) and the Settlement Agreement, which are available at www.SilverFixSettlement.com.

If you are not sure if you are included in the Settlement Class, you can get more information, including the detailed Notice, at www.SilverFixSettlement.com or by calling toll-free 1-800-254-2939 (if calling from outside the United States or Canada, call 1-414-961-6577).

What Is This Lawsuit About and What Does the Settlement Provide?

Plaintiffs allege that each Defendant, including Deutsche Bank, conspired to dictate the price of silver during a daily, secret, and unregulated meeting (the “Silver Fix”). Defendants are alleged to have coordinated manipulative silver transactions in advance of the daily Silver Fix call. The alleged goal of Defendants was to manipulate the Fix price in their desired direction. Defendants allegedly agreed to fix the “bid-ask spread” artificially wider when offering to buy or sell silver in the public silver market trading with Plaintiffs and the Class. Defendants also allegedly implemented coordinated trading strategies to manipulate and maintain the price of Silver Instruments at artificial levels during the Class Period. Plaintiffs have asserted legal claims under the federal antitrust law, Commodity Exchange Act, and common law.

To settle the claims in this lawsuit and without admitting any liability, fault, or wrongdoing, Deutsche Bank has agreed to pay a total of \$38 million (the “Settlement Fund”) in cash for the benefit of the proposed Settlement Class. If the Settlement is approved, the Settlement Fund, plus interest earned from the date it was established, less any Taxes, any Notice and Administration Costs, any Court-awarded attorneys’ fees, payment of litigation costs and expenses, and service awards for Plaintiffs, and any other costs or fees approved by the Court (the “Net Settlement Fund”) will be divided among all Settlement Class Members who file valid Proofs of Claim and Release.

Will I Get a Payment?

If you are a member of the Settlement Class and do not opt out, you will be eligible for a payment from the Net Settlement Fund if you file a Proof of Claim and Release (“Claim Form”). You also may obtain more information at www.SilverFixSettlement.com or by calling toll-free 1-800-254-2939 (if calling from outside the United States or Canada, call 1-414-961-6577).

Claim Forms must be submitted online at www.SilverFixSettlement.com on or before 11:59 p.m. Eastern time on **March 1, 2021** OR mailed to and received by the Settlement Administrator, A.B. Data by **March 1, 2021**.

What Are My Rights?

If you are a member of the Settlement Class and do not opt out, you will release certain legal rights against Deutsche Bank and the DB Released Parties, as explained in the detailed Notice and Settlement Agreement, which are available at www.SilverFixSettlement.com. If you do not want to take part in the Settlement, you must opt out by **February 11, 2021**. You may object to the Settlement, Distribution Plan, and/or application for an award of attorneys’ fees, payment of litigation costs and expenses, and/or service awards for Plaintiffs. If you want to object, you must do so by **February 11, 2021**. Information on how to opt out or object is contained in the detailed Notice, which is available at www.SilverFixSettlement.com.

When Is the Fairness Hearing?

The Court will hold a hearing at the United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 443, New York, NY 10007, on **April 8, 2021** at **10:00 A.M.** to consider whether to finally approve this Settlement, Distribution Plan, and application for an award of attorneys' fees, payment of litigation costs and expenses, and any service awards for Plaintiffs. Given the current COVID-19 situation, the Court reserves the right to conduct the final fairness hearing remotely. You or your lawyer may ask to appear and speak at the hearing at your own expense, but you do not have to. Any changes to the time and place of the Fairness Hearing, or other deadlines, will be posted to www.SilverFixSettlement.com as soon as practicable.

For more information, call toll-free 1-800-254-2939 (if calling from outside the United States or Canada, call 1-414-961-6577) or visit www.SilverFixSettlement.com.

******* Please do not call the Court or the Clerk of the Court for information about the Settlement. *******

EXHIBIT D

SHOP NOW

Premium

Login | Sign Up | Refresh Page |

Search Kitco.com

Home Buy/Sell Gold & Silver Bullion Coins and Bars All Metal Quotes Charts & Data Markets News Commentaries Mining Gold Forum Mobile Apps Jeweler Resources About

Favorites: Base Metals | More News | Mining News | Kitco Education (NEW)

EDIT [Social Media Icons]

XPLOR 2020 CONFERENCE
 OCT 19-23 ONLINE
 STAY TUNED
 SPONSORED BY RadSSort | KITCO NEWS

Live Spot Gold
 SPOT MARKET IS OPEN
 closes in 21 hrs, 1 min.
 Sep 23, 2020 19:55 NY Time

Bid/Ask	1853.90 / 1855.00
Low/High	1852.20 / 1895.20
Change	-9.10 -0.49%
30daychg	-74.70 -3.87%
1yearchg	+332.30 +21.84%

Alerts [on] Charts [on]

Silver Price & PGMs
 Sep 23, 2020 19:59 NY Time
 Kitco 10AM Silver Fix

Silver	21.97	-0.78
Platinum	829.00	-5.00
Palladium	2085.00	-11.00
Rhodium	11100.00	0.00

Market Indices

Symbol or name	Search	
U.S.	EUROPE	ASIA
DJIA	26,763.13	-525.05
S&P 500	3,236.92	-78.65
NASDAQ	10,832.99	-330.65

Index data delayed 10 min.

Metals Futures

KGX ▼ Did Gold really go down 9.1 (-0.49%)

Latest Gold News Market News Street Talk Show: 15 30 45

- Gold price is not out of line with fair value, lots of upside ... Kitco News 04:45PM
- AFTER HOURS** It's not about U.S. dollar strength, rather Euro dollar ... Kitco Commentary 05:51PM
- The case for gold going to \$7,000 by 2030 - Charlie Morris Kitco Video News 04:38PM
- INTERVIEW** Use this gold price weakness as 'aggressive buying ... Kitco News 02:45PM
- GOLD SURVEY:** Where is gold headed next week? Vote now! Kitco News 04:53PM
- Why gold ETF flows plunged and central banks stopped buying - Jeff ... Kitco Video News 11:39AM
- FEATURE:** Look for gold mining investments in safe jurisdictions - ... Kitco News 01:52PM
- \$1 billion penalty to be levied against JPMorgan for spoofing - ... Kitco News 03:03PM
- PM ROUNDUP:** Gold, silver bulls staggered by near-term knock-down ... Kitco News 01:10PM
- Why central banks stopped buying gold and ETF inflows plunged - Jeff ... Kitco News 01:00PM
- UPDATE** Silver price slumps to 7-week low and now trending down Kitco News 10:46AM
- FOCUS** Silver price down 13% this week but that is what silver does - ... Kitco News 10:18AM
- 'The only one of its size and scale' - Cornerstone on its Cascabel ... Kitco Video News Sep 22
- Fed policymakers double down on vow to keep interest rates near zero Reuters 04:32PM
- Sterling erases recent losses, jumping 0.8% versus weaker euro Reuters 03:56PM

+ More Gold News

Search All News

Sponsored Content

La Negra - Mexico

Quality Silver Assets Are Scarce ... We Have Several

KOOTENAY SILVER INC

TSX-V: KTN.VN
 Sep 23, 2020 17:40 NY Time

\$ 0.38
 -0.05 (-11.63%)

H: 0.42
 L: 0.37
 Val: 954,448

[KTN Drills 608 G/T Silver Over 5m @ Columba](#)

[KTN Drills 1,297 G/T Silver Of 3.2m @ Copalito](#)

[KTN Drills 865 G/T Silver Of 2m @ Columba](#)

[Assets Provide Strong Leverage to Silver Price](#)

[\\$5M Strategic Investment By Eric Sprott](#)

Contributed Commentaries Show: 15 30 45

Gold Price | USD | CAD | EUR | GBP

BID	ASK	+/-	%
2481.82	2483.29	-11.01	-0.44



If You Transacted in Physical Silver or Silver Derivative Instruments via an Exchange or Over-the-Counter

from January 1, 1999 - September 6, 2016,
 Your Rights May Be Affected by a Pending Class Action Settlement

LEARN MORE HERE
 silverfixsettlement.com

Video News


GOLD HAS 15% PREMIUM

EXHIBIT E

Barchart.com's Chart of the Day - Vivint Solar - All Time High

October 1, 2020: Published by Barchart.com

If You Transacted in Physical Silver or Silver Derivative Instruments via an Exchange or Over-the-Counter
from January 1, 1999 - September 6, 2016,
 Your Rights May Be Affected by a Pending Class Action Settlement

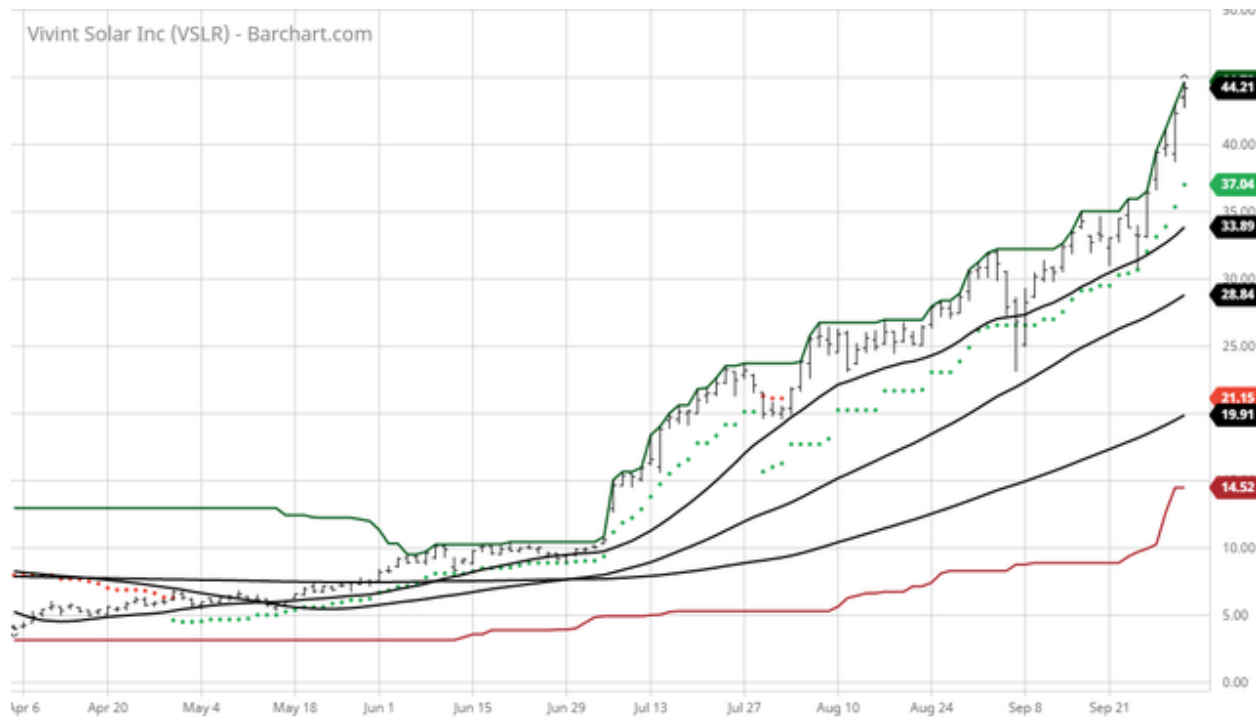


LEARN MORE HERE

silverfixsettlement.com

The [Barchart Chart of the Day](#) belongs to the residential solar energy systems company [Vivint Solar \(NYSE:VSLR\)](#). I found the stock by soring [Barchart's New All-Time High list](#) first by the highest Weighted Alpha, then used the Flipchart function to review the charts for consistent price appreciation. Since the Trend Spotter signaled a buy on 8/3 the stock gained 93.91%.

Vivint Solar Inc. is a provider of residential solar energy systems in the United States. It designs, installs, and maintains cost-effective solar energy systems. The Company also offers photovoltaic installation software products and devices. Vivint Solar, Inc. is headquartered in Provo, Utah.



Barchart's Opinion Trading systems are listed below. Please note that the Barchart Opinion indicators are updated live during the session every 10 minutes and can therefore change during the

day as the market fluctuates. The indicator numbers shown below therefore may not match what you see live on the Barchart.com website when you read this report.

Barchart technical indicators:

- 100% technical buy signals
- 733.31+ Weighted Alpha
- 581.03% gain in the last year
- Trend Spotter buy signal
- Above its 20, 50 and 100 day moving averages
- 10 new highs and up 36.21% in the last month
- Relative Strength Index 79.73%
- Technical support level at 39.72
- Recently traded at 44.13 with a 50 day moving average of 28.82

Fundamental factors:

- Market Cap \$5.32 billion
- Revenue expected to grow 15.50% this year and another 13.70% next year
- Earnings estimated to increase 94.00% this year and an additional 340.00% next year
- Wall Street analysts issued 3 strong buy, 1 buy and 2 hold recommendations on the stock
- The individual investors following the stock on Motley Fool voted 59 to 23 that the stock will beat the market
- 16,910 investors are monitoring the stock on Seeking Alpha

The #1 strategy that could have sent you 20 years with no losing years...

Trophy Trades have already proven to have the potential to earn you as much as \$13.5 million dollars...

But it's never been released to the public before - now that changes for you

[Click here to save your spot for the LIVE reveal of Trophy Trades](#)

(By clicking the link above you will automatically opt-in to receive emails from WealthPress)

<hr size=2 width="100%" align=center>

More on this symbol:

- | | | |
|--------------------------------------|---|--------------------------------------|
| • QUOTES | • OPTIONS | • ANALYSTS |
| • Overview | • Options Quotes | • Earnings Estimates |
| • Performance Report | • Volatility & Greeks | • Analyst Ratings |
| | • Covered Calls | |
| | • Naked Puts | |
| • CHARTS | | • FINANCIALS |

- [Interactive Chart](#)
- [Option Spreads](#)
- [Income Statement](#)
- [Technical Chart](#)
- [Cash Flow](#)
- [Balance Sheet](#)
- **COMPANY**
- [News](#)
- [Profile](#)
- **ARCHIVE**
- [SEC Filings](#)
- [Past Reports](#)
- [Competitors](#)
- [Stock Comparison](#)
- **TECHNICALS**
- [Technical Analysis](#)
- [Trader's Cheat Sheet](#)
- [Barchart Opinion](#)
- [Trading Strategies](#)
- [Price History](#)

[Free Newsletters](#)

You're receiving this email because you registered for the Barchart's Chart of the Day subscription service/newsletter or because you have a prior existing relationship with [Barchart.com](#) and previously provided your email address to us. To ensure that you continue to receive emails from us, add newsletters@barchart.com to your address book today.

Copyright © 2018, All rights reserved. The information contained herein is derived from public sources believed to be reliable but is not guaranteed as to its accuracy or completeness. No responsibility is assumed for the use of this material and no express or implied warranties nor guarantees are made. Nothing contained herein should be construed as an offer to buy or sell, or as a solicitation to buy or sell, any securities or derivative instruments.

Barchart.com, Inc. • 209 W Jackson • Chicago, IL 60606 • USA

[Unsubscribe from this list](#)

EXHIBIT F

From: STOCKS & COMMODITIES Magazine [<mailto:circ@Traders.com>]
Sent: Wednesday, October 07, 2020 7:06 AM
To: Paul Whalen
Subject: Pending Class Action Settlement If You Transacted in Silver

[View this email in your browser](#)

**If You Transacted in Physical Silver or Silver Derivative
Instruments via an Exchange or Over-the-Counter**

from January 1, 1999 - September 6, 2016,

Your Rights May Be Affected by a Pending Class Action Settlement



[LEARN MORE HERE](#)

silverfixsettlement.com

SUMMARY NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

If you entered into a U.S.-Related Transaction in or on any over-the-counter market or exchange in physical silver or in a derivative instrument in which silver is the underlying reference asset from January 1, 1999 through and including September 6, 2016 ("Settlement Class Period"), your rights may be affected by a pending class action settlement and you may be entitled to a portion of the settlement fund.

This Summary Notice is to alert you to a proposed settlement totaling \$38,000,000.00 reached with Deutsche Bank AG, Deutsche Bank Americas Holding Corporation, DB U.S. Financial Markets Holding Corporation, Deutsche Bank Securities, Inc., Deutsche Bank Trust Corporation, Deutsche Bank Trust Company Americas, Deutsche Bank AG New York Branch, and their subsidiaries and affiliates (collectively "Deutsche Bank"). Deutsche Bank denies any liability, fault, or wrongdoing of any kind in connection with the allegations in the Action. By entering into the proposed settlement, Deutsche Bank has not admitted to any such liability, fault, or wrongdoing, and nothing in the Settlement Agreement or this Notice shall be construed as such an admission.

The United States District Court for the Southern District of New York (the "Court") authorized this Notice. The Court has appointed the lawyers listed below to represent the Settlement Class in this Action:

Vincent Briganti

LOWEY
DANNENBERG,
P.C.

44 South
Broadway, Suite
1100

White Plains, NY
10601

Telephone: (914)
733-7221

vbriganti@lowey.com

Robert Eisler

GRANT & EISENHOFER P.A.
485 Lexington Avenue, 29th Floor
New York, NY 10017

Telephone: (646) 722-8500

reisler@gelaw.com

Who Is a Member of the Settlement Class?

Subject to certain exceptions, the proposed Settlement Class consists of all persons and entities who or which entered into a U.S.-Related Transaction (1) in or on any over-the-counter market or exchange in physical silver or (2) in a derivative instrument in which silver is the underlying reference asset (collectively, "Silver Instruments") during the Class Period.

"U.S.-Related Transaction" means any transaction in a Silver Instrument: (a) by any person or entity domiciled in the U.S. or its territories; or (b) by any person or entity domiciled outside the U.S. or its territories but conducted, in whole or in part, in the U.S. or its territories.

The other capitalized terms used in this Summary Notice are defined in the detailed Notice of Proposed Class Action Settlement, April 8, 2021 Fairness Hearing Thereon and Class Members' Rights ("Notice") and the Settlement Agreement, which are available at www.SilverFixSettlement.com.

If you are not sure if you are included in the Settlement Class, you can get more information, including the detailed Notice, at www.SilverFixSettlement.com or by calling toll-free 1-800-254-2939 (if calling from outside the United States or Canada, call 1-414-961-6577).

What Is This Lawsuit About and What Does the Settlement Provide?

Plaintiffs allege that each Defendant, including Deutsche Bank, conspired to dictate the price of silver during a daily, secret, and unregulated meeting (the "Silver Fix"). Defendants are alleged to have coordinated manipulative silver transactions in advance of the daily Silver Fix call. The alleged goal of Defendants was to manipulate the Fix price in their desired direction. Defendants allegedly agreed to fix the "bid-ask spread" artificially wider when offering to buy or sell silver in the public silver market trading with Plaintiffs and the Class. Defendants also allegedly implemented coordinated trading strategies to manipulate and maintain the price of Silver Instruments at artificial levels during the Class Period. Plaintiffs have asserted legal claims under the federal antitrust law, Commodity Exchange Act, and common law.

To settle the claims in this lawsuit and without admitting any liability, fault, or wrongdoing, Deutsche Bank has agreed to pay a total of \$38 million (the "Settlement Fund") in cash for the benefit of the proposed Settlement Class. If the Settlement is approved, the Settlement Fund, plus interest earned from the date it was established, less any Taxes, any Notice and Administration Costs, any Court-awarded attorneys' fees, payment of litigation costs and expenses,

and service awards for Plaintiffs, and any other costs or fees approved by the Court (the "Net Settlement Fund") will be divided among all Settlement Class Members who file valid Proofs of Claim and Release.

Will I Get a Payment?

If you are a member of the Settlement Class and do not opt out, you will be eligible for a payment from the Net Settlement Fund if you file a Proof of Claim and Release ("Claim Form"). You also may obtain more information at www.SilverFixSettlement.com or by calling toll-free 1-800-254-2939 (if calling from outside the United States or Canada, call 1-414-961-6577).

Claim Forms must be submitted online at www.SilverFixSettlement.com on or before 11:59 p.m. Eastern time on **March 1, 2021 OR** mailed to and received by the Settlement Administrator, A.B. Data by **March 1, 2021**.

What Are My Rights?

If you are a member of the Settlement Class and do not opt out, you will release certain legal rights against Deutsche Bank and the DB Released Parties, as explained in the detailed Notice and Settlement Agreement, which are available at www.SilverFixSettlement.com. If you do not want to take part in the Settlement, you must opt out by **February 11, 2021**. You may object to the Settlement, Distribution Plan, and/or application for an award of attorneys' fees, payment of litigation costs and expenses, and/or service awards for Plaintiffs. If you want to object, you must do so by **February 11, 2021**. Information on how to opt out or object is contained in the detailed Notice, which is available at www.SilverFixSettlement.com.

When Is the Fairness Hearing?

The Court will hold a hearing at the United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse,

40 Foley Square, Courtroom 443, New York, NY 10007, on **April 8, 2021** at **10:00 A.M.** to consider whether to finally approve this Settlement, Distribution Plan, and application for an award of attorneys' fees, payment of litigation costs and expenses, and any service awards for Plaintiffs. Given the current COVID-19 situation, the Court reserves the right to conduct the final fairness hearing remotely. You or your lawyer may ask to appear and speak at the hearing at your own expense, but you do not have to. Any changes to the time and place of the Fairness Hearing, or other deadlines, will be posted to www.SilverFixSettlement.com as soon as practicable.

For more information, call toll-free 1-800-254-2939 (if calling from outside the United States or Canada, call 1-414-961-6577) or visit www.SilverFixSettlement.com.

***** Please do not call the Court or the Clerk of the Court for information about the Settlement. *****

If You Transacted in Physical Silver or Silver Derivative Instruments via an Exchange or Over-the-Counter

from January 1, 1999 - September 6, 2016,

Your Rights May Be Affected by a Pending Class Action Settlement



LEARN MORE HERE

silverfixsettlement.com

To discontinue future mailings from Technical Analysis, Inc., STOCKS & COMMODITIES magazine and Traders.com, please [follow this link](#).

Technical Analysis, Inc., 4757 California AVE SW, Seattle, WA 98116, USA

EXHIBIT G

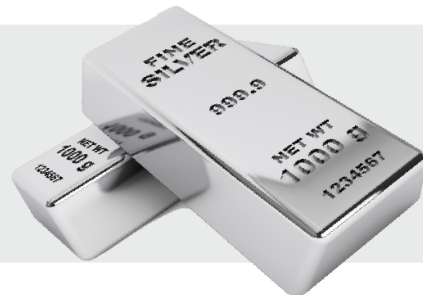
SilverFixSettlement.com

(/)

1-800-254-2939



**If You Transacted in
PHYSICAL SILVER
OR SILVER DERIVATIVE
INSTRUMENTS**



Via an Exchange or Over-the-Counter,
between January 1, 1999 and September 6, 2016,

Your Rights May Be Affected by a Pending Class Action Settlement

Find out your **options**
and whether you are eligible for
proposed class action **benefits.**

Click Here NOW

(/Online)

The information contained on this web page is only a summary of information presented in more detail in the Notice, which you can access by clicking here ([/docs/Silver - Long Form Notice \(Final\).pdf](/docs/Silver - Long Form Notice (Final).pdf)). Since this website is just a summary, you should review the Notice and Settlement Agreement for additional details.

Your legal rights are affected even if you do nothing. Please read the Notice ([/docs/Silver - Long Form Notice \(Final\).pdf](/docs/Silver - Long Form Notice (Final).pdf)) carefully.

IF YOU TRANSACTED IN U.S.-RELATED TRANSACTIONS IN OR ON ANY OVER-THE-COUNTER MARKET (“OTC”) OR EXCHANGE IN PHYSICAL SILVER OR IN A DERIVATIVE INSTRUMENT IN WHICH SILVER IS THE UNDERLYING REFERENCE ASSET (COLLECTIVELY, “SILVER INSTRUMENTS”), AT ANY TIME FROM JANUARY 1, 1999 THROUGH SEPTEMBER 6, 2016, WHERE SUCH PERSONS OR ENTITIES WERE EITHER DOMICILED IN THE UNITED STATES OR ITS TERRITORIES OR, IF DOMICILED OUTSIDE THE UNITED STATES OR ITS TERRITORIES, TRANSACTED IN THE UNITED STATES OR ITS TERRITORIES.

Your Legal Rights and Options in These Settlements

SUBMIT A CLAIM EITHER POSTMARKED BY MAIL or ELECTRONICALLY FILED ON THE SETTLEMENT WEBSITE NO LATER THAN MARCH 1, 2021

This is the only way to get a payment. See Section III (A) in the Notice for additional information.

ASK TO BE EXCLUDED BY SUBMITTING A WRITTEN REQUEST POSTMARKED NO LATER THAN FEBRUARY 11, 2021

You will get no monetary benefits from the Settlement. This is the only option that allows you to independently assert the claims released by this Settlement against the Settling Defendant. See Section III (C) in the Notice for additional information.

OBJECT TO THE SETTLEMENTS BY SUBMITTING A WRITTEN OBJECTION RECEIVED AND FILED NO LATER THAN FEBRUARY 11, 2021

If you wish to object to the Settlement, or anything else mentioned in this Notice, you must file a written objection. See Section III (B) in the Notice for additional information.

Your Legal Rights and Options in These Settlements

GO TO THE FAIRNESS HEARING ON APRIL 8, 2021 AT 10:00 A.M., AND FILE A NOTICE OF INTENTION TO APPEAR THROUGH COUNSEL NO LATER THAN FEBRUARY 11, 2021

You may also request to be heard at the Fairness Hearing. See Section VI in the Notice for additional information.

Do Nothing

You will forfeit your right to get a monetary benefit from the Settlement and give up your rights to assert claims released by this Settlement against the Settling Defendant about the alleged conspiracy to dictate the price of silver.

What is this lawsuit about?

Plaintiffs allege that each Defendant, from January 1, 1999 through September 6, 2016 inclusive (the "Settlement Class Period"), conspired to dictate the price of silver during a daily, secret, and unregulated meeting (the "Silver Fix"). The Silver Fix was intended to determine the global benchmark price per ounce of silver (the "Fix price") based on supply and demand fundamentals stemming from a competitive silver auction among the fixing members. However, Defendants allegedly capitalized on the lack of regulatory oversight and the private nature of the Silver Fix to facilitate Defendants' agreement to manipulate and fix silver prices and the prices of Silver Instruments during the Settlement Class Period. Defendants allegedly transacted in price-fixed Silver Instruments with uninformed market participants like Plaintiffs and the Settlement Class. Defendants allegedly did so through several means of manipulation.

First, Defendants allegedly coordinated manipulative silver transactions in advance of the daily fixing call. Defendants' alleged goal was to manipulate the Fix price in their desired direction. Both the Fixing members and other market maker Defendants allegedly conspired to manipulate the Silver Fix to benefit their silver trading positions.

Second, Defendants allegedly agreed to fix the "bid-ask spread" artificially wider when offering to buy or sell silver in the public silver market trading with Plaintiffs and the Settlement Class. Defendants allegedly effectuated the manipulation of spreads by sharing incoming and pending order flow and client information, including prices quoted to specific customers. Due to Defendants' alleged quoting of artificial, anticompetitive spreads in the silver market, it is alleged that Plaintiffs and the Settlement Class were systematically overcharged by Defendants' inflation of the "ask price," or the price at which Defendants offered to sell silver, and were underpaid by Defendants' suppression of the "bid price," or the price at which Defendants offered to buy silver.

Third, Defendants allegedly implemented coordinated trading strategies to manipulate and maintain the price of Silver Instruments at artificial levels during the Settlement Class Period. These alleged strategies included: (i) conspiring to execute large transactions during times when they knew the silver market was illiquid; (ii) execution of uneconomic buying of silver to provide artificial support for agreed-upon price levels; and (iii) withholding pricing information from the silver market by entering secret, unreported transactions with other co-conspiring Defendants. Defendants alleged aim was to profit from their illegitimate trading activity, despite the direct harm caused to Plaintiffs and the Settlement Class.

Plaintiffs have asserted legal claims under federal antitrust law for price fixing and unlawful restraint of trade; and the Commodity Exchange Act for price manipulation, manipulation by false reporting and fraud and deceit, aiding and abetting and principal-agent liability.

Plaintiffs and Plaintiffs' Interim Co-Lead Counsel believe that Settlement Class Members have been damaged by Defendants' conduct. Deutsche Bank does not agree with the allegations made by Plaintiffs, believes that it has meritorious defenses to Plaintiffs' allegations, and believes that certain of Plaintiffs' claims would have been rejected prior to trial, at trial (had Plaintiffs successfully certified a class and survived summary judgment motions), or on appeal. As a result, Deutsche Bank believes Settlement Class Members would have received nothing if the litigation had continued to trial.

The Court has not decided for or against Plaintiffs or Deutsche Bank. Instead, Plaintiffs' Interim Co-Lead Counsel engaged in negotiations with Deutsche Bank to reach a negotiated resolution of the claims against Deutsche Bank in this Action. The Settlement allows Plaintiffs and Deutsche Bank to avoid the risks and costs of lengthy litigation and the uncertainty of pre-trial proceedings, a trial, and appeals. If approved, the Settlement would permit eligible Settlement Class Members, who file timely and valid Claim Forms, to receive compensation, rather than risk ultimately receiving nothing. Plaintiffs and Plaintiffs' Interim Co-Lead Counsel believe the Settlement is in the best interest of all Settlement Class Members.

Deutsche Bank has paid into escrow a total of \$38 million (the "Settlement Fund") in cash for the benefit of the proposed Settlement Class. If the Settlement is finally approved, the Settlement Fund, plus interest earned from the date it was established, less any Taxes, any Notice and Administration Costs, any Court-awarded attorneys' fees, litigation costs and expenses, and service awards for Plaintiffs, and any other costs or fees approved by the Court (the "Net Settlement Fund"), will be divided among all Settlement Class Members who file valid Claim Forms.

If the Settlement is finally approved, the Action will conclude against Deutsche Bank, and Deutsche Bank will be released from claims concerning this lawsuit, as described more fully below. If the Settlement is not approved, Deutsche Bank will remain in the Action, and Plaintiffs will continue to pursue their claims against Deutsche Bank.

How do I know if I am part of the Settlement?

The Court preliminarily approved the following Settlement Class, defined as:

All persons or entities that transacted in U.S.-Related Transactions in or on any over-the-counter market (“OTC”) or exchange in physical silver or in a derivative instrument in which silver is the underlying reference asset (collectively, “Silver Instruments”), at any time from January 1, 1999 through the date of this Settlement Agreement.

“US-Related Transaction” means any transaction in a Silver Instrument (a) by any person or entity domiciled in the U.S. or its territories, or (b) by any person or entity domiciled outside the U.S. or its territories but conducted, in whole or in part, in the U.S. or its territories.

What does the Settlement provide?

Assuming final approval by the Court, the thirty-eight million dollars (\$38,000,000) plus interest obtained from Deutsche Bank, net of such attorneys’ fees, costs, fees, taxes, and other deductions as are approved by the Court (the “Net Settlement Fund”), will be distributed to Settlement Class Members who properly complete and timely return a valid Claim Form and are entitled to distribution under the Distribution Plan.

How can I receive a payment?

To participate in and receive your share of the Net Settlement Fund, you must submit a valid and timely Claim Form demonstrating that you are an Authorized Claimant as set forth in the Settlement Agreement. You may obtain and submit a Claim Form no later than March 1, 2021. Claim Forms, if sent by mail, must be addressed to the Settlement Administrator (see address in Section VIII in the Notice) and received no later than March 1, 2021.

Any Settlement Class Member who fails to submit a Claim Form by March 1, 2021 in the manner specified will be barred from receiving any payment from the Net Settlement Fund (unless, by Order of the Court, an untimely Claim Form submitted by such member of the Settlement Class is approved), but will in all other respects be bound by the terms of the Settlement Agreement and by the Final Judgment entered on the Settlement Class’ claims.

How do I request exclusion from the Settlement?

To exclude yourself from the Settlement, you must mail a letter or other written document (“Request for Exclusion”) to the Settlement Claims Administrator, A.B. Data, Ltd. (the “Claims Administrator”). To exclude yourself from the Settlement you must file a timely written Request for Exclusion.

To be valid, a Request for Exclusion must be in writing and include:

- The name, address, and telephone number of the Settlement Class Member seeking to be excluded;
- A list of all trade names or business names that the Settlement Class Member requests to be excluded;
- The name and case number of this Action (In re London Silver Fixing, Ltd. Antitrust Litigation, Nos. 14-md-02573 (VEC) (S.D.N.Y.), 14-mc-02573(VEC) (S.D.N.Y.));
- A statement certifying such person is a Settlement Class Member;
- A description of the Silver Instruments transactions entered into by the Settlement Class Member that fall within the Settlement Class definition (including, for each transaction, the date, time and location of the transaction, the instrument type, direction (i.e., purchase or sale) of the transaction, the counterparty, any transaction identification numbers, the total amount transacted (in both ounces of silver and in U.S. Dollars)); and
- A statement that “I/we hereby request that I/we be excluded from the Settlement Class.” If you are unwilling or unable to provide a description of the Silver Instruments transactions, your Request for Exclusion must contain a short explanation as to why you are unwilling or unable to do so.
- Be mailed to the Claims Administrator at the address provided below and postmarked no later than **February 11, 2021**.

You must also provide any other information reasonably requested by the Claims Administrator. You must mail your Request for Exclusion, postmarked no later than February 11, 2021, to London Silver Fixing, Ltd. Antitrust Settlements, EXCLUSIONS, c/o A.B. Data, Ltd., P.O. Box 173001, Milwaukee, WI 53217.

All Persons who submit valid and timely Requests for Exclusion in the manner set forth herein shall have no rights under the Settlement Agreements, shall not share in the distribution of any of the Net Settlement Fund, and shall not be bound by the Settlements or the Judgment entered in the Action. Any Person who fails to timely or validly file a Request for Exclusion, or whose Request for Exclusion is not otherwise accepted by the Court, shall be deemed a Settlement Class Member.

How do I tell the Court if I oppose any of the Settlements?

If you are a Settlement Class Member and you do not exclude yourself, you can tell the Court what you think about the Settlement. You can object to all or any part of the Settlement,

Distribution Plan, and/or application for attorneys' fees, reimbursement of litigation costs and expenses, and any service awards for Plaintiffs. You can give reasons why you think the Court should approve them or not. The Court will consider your views. You may also ask to intervene in the Action.

If you want to make an objection or intervene in the Action, you may enter an appearance in the Action, at your own expense, individually or through counsel of your own choice, by filing with the Clerk of Court a notice of appearance and your objection, and serving copies of your objection on Plaintiffs' Interim Co-Lead Counsel, and Deutsche Bank's Counsel by **February 11, 2021** to the following mailing addresses:

<p>Vincent Briganti LOWEY DANNENBERG, P.C. 44 S. Broadway, Suite 1100 White Plains, NY 10601- 2310</p>	<p>Robert Eisler GRANT & EISENHOFER P.A. 485 Lexington Avenue, 29th Floor New York, NY 10017</p>	<p>Robert W. Allen KIRKLAND & ELLIS, LLP 601 Lexington Ave. New York, NY 10022</p>
<p>Plaintiffs' Interim Co-Lead Counsel</p>		<p>Counsel for Deutsche Bank</p>

Any Settlement Class Member who does not enter an appearance will be represented by Plaintiffs' Interim Co-Lead Counsel.

If you choose to object, you must file a written objection with the Clerk of the Court. You cannot file an objection by telephone or email. Your written objection must include a statement of the objection or motion to intervene, as well as the specific legal and factual reasons for each objection or motion to intervene, including all support that the objecting Settlement Class Member or the governmental entity wishes to bring to the Court's attention and all evidence the objecting Settlement Class Member or governmental entity wishes to introduce in support of his, her, or its objection or motion. The submission must contain:

- A heading that refers to this Action by case name and case number (*In re London Silver Fixing, Ltd. Antitrust Litigation*, Nos. 14-md-02573 (VEC) (S.D.N.Y.), 14-mc-02573(VEC) (S.D.N.Y.));
- A statement of the specific legal and factual basis for each objection or intervention argument, including whether the objection applies only to the objecting person, a specific subset of the Settlement Class, or the entire Settlement Class;
- A statement of whether the objecting or intervening person or entity intends to appear at the Fairness Hearing, either in person or through counsel and, if through counsel, a statement identifying that counsel by name, address, and telephone number;
- A description of any and all evidence the objecting person or entity may offer at the Fairness Hearing, including but not limited to the names, addresses, and expected testimony of any witnesses; all exhibits intended to be introduced at the Fairness Hearing; and documentary proof of the objecting person's membership in the Settlement Class;
- A description of the Silver Instruments transactions entered into by the member of the Settlement Class that fall within the Settlement Class definition (including, for each transaction, the date, time and location of the transaction, the instrument type, direction (i.e., purchase or sale) of the transaction, the counterparty, any transaction identification numbers, the total amount transacted (in both ounces of silver and in U.S. Dollars); and
- A list of other cases in which the objector or intervenor or counsel for the objector or intervenor has appeared either as an objector or counsel for an objector in the last five years.
- The objecting Settlement Class Member's signature.

If you do not timely and validly submit your objection, your views will not be considered by the Court or any court on appeal.

Commodities Brokers and other Nominees: Please visit the Institutional E-Filing page of this website

If you have questions, you may call the Settlement Help Line at 800-254-2939 or email info@SilverFixSettlement.com.

[Click Here NOW](#)

(/Online)

By providing your information, either on paper, electronically or through a website, you consent to us storing and using your information for case administration purposes only. Our site uses tracking technologies to tailor your experience and understand how you and other visitors use our site. By continuing to navigate this site you consent to use of these tracking technologies. For more information on how we use your personal data, please read our Privacy Policy (<https://abdatacaadstorage1.blob.core.windows.net/privacy/PrivacyPolicy.pdf>)

© 2020 - Silver Fix Settlement All rights reserved.