

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PASHA S. ANWAR, et al.,

Plaintiffs,

v.

FAIRFIELD GREENWICH LIMITED, et al.,

Defendants.

Master File No. 09-cv-118 (VM) (FM)

**AFFIDAVIT OF JASON RABE REGARDING
CLASS NOTICE AND ADMINISTRATION OF THE PWC SETTLEMENT**

STATE OF MINNESOTA)
) ss:
COUNTY OF HENNEPIN)

JASON RABE, being duly sworn, deposes and says:

1. I am a Program Manager at Rust Consulting, Inc. (“Rust”). Rust was appointed Claims Administrator pursuant to paragraph 8 of this Court’s Order Preliminarily Approving Settlement and Providing for Notice of Proposed Settlement, dated January 7, 2016 (the “Preliminary Approval Order”) in connection with the PwC Settlement (“PwC Settlement”) obtained in the above-titled action (the “Action”). I have the responsibility for overseeing all aspects of the notice and claims administration services performed by Rust with respect to the PwC Settlement.

2. I respectfully submit this affidavit in order to provide the Court with information regarding, among other things: (i) the mailing of the Notice of Proposed Settlement of Class Action and Settlement Fairness Hearing, and Motion for Attorneys’ Fees and Reimbursement of Expenses (the “PwC Notice”) and Proof of Claim and Release Form (the “PwC Proof of

Claim”); and (ii) the publication of the Summary Notice. I am over 21 years of age and am not a party to this Action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

MAILING OF THE NOTICE AND PROOF OF CLAIM

3. The Court’s Preliminary Approval Order required Rust to, among other things, mail the Court-approved PwC Notice and PwC Proof of Claim (together, the “PwC Notice Packet”) to potential Settlement Class Members (“Class Members”). A true and correct copy of the PwC Notice Packet is attached hereto as Exhibit A.

4. Rust, as the Court approved Claims Administrator of the settlements in this Action with the Fairfield Greenwich (“FG”) Defendants as approved by the Court by Order dated March 25, 2013 (the “FG Settlement”), GlobeOp Financial Services LLC (“GlobeOp”) as approved by the Court by Order dated November 22, 2013 (the “GlobeOp Settlement”) and the Citco Defendants as approved by the Court by Order dated November 20, 2015 (the “Citco Settlement”), was provided the names and addresses of persons and entities who were record owners of shares or limited partnership interests in Fairfield Sentry Limited, Fairfield Sigma Limited, Fairfield Lambda Limited, Greenwich Sentry, L.P., and Greenwich Sentry Partners, L.P. (collectively the “Funds”) as of December 10, 2008.

5. Since the mailings of Notice Packets in the FG, GlobeOp and Citco Settlements, and during the normal course of administering the FG, GlobeOp and Citco Settlements, Rust has continually updated the settlement mailing list by:

- a. adding names and addresses of potential Class Members received from financial institutions, brokers and nominees;

b. updating potential Class Members' addresses pursuant to their written requests;

c. updating potential Class Members' addresses as a result of receiving forwarding addresses from the United States Postal Service ("USPS"); and

d. updating potential Class Members' undeliverable addresses as a result of obtaining new addresses through an information supplier.

6. In addition to the foregoing, Rust added to the mailing list for the PwC Settlement the names and addresses of potential Class Members who had filed eligible claims in the FG and/or GlobeOp Settlements, those who filed claims that were determined to be ineligible but could be cured by submitting additional information, and those who filed claims in the Citco Settlement who did not previously file claims in the FG or GlobeOp Settlements.

7. In preparation for mailing the PwC Notice Packet, Rust electronically scrubbed this name and address data to ensure adequate addressing and remove duplicative name and address records.

8. By means of the foregoing actions, Rust prepared a list of 5,077 name and address records that were used to mail the PwC Notice Packets. On January 22, 2016, Rust initiated the process of mailing PwC Notice Packets to the 5,077 potential Class Members.

9. Through March 16, 2016, Rust has filled requests for an additional 81 PwC Notice Packets that were received directly from claimants, or from financial institutions, brokers, nominees and record owners to be forwarded to beneficial owners.

10. Through March 16, 2016, Rust has disseminated a total of 5,158 PwC Notice Packets to potential Class Members.¹

PUBLICATION OF THE SUMMARY NOTICE

11. In accordance with the Preliminary Approval Order, Rust caused the Summary Notice to be published once each in the international editions of *The Wall Street Journal* on February 1 or February 3, 2016. Attached hereto as Exhibit B is a detailed schedule of said publications and as Exhibit C are samples of the notice as published. Also pursuant to the Preliminary Approval Order, Rust caused the Summary Notice to be transmitted for worldwide distribution, including North America, over *PR Newswire* on February 1, 2016. Attached hereto as Exhibit D are true and correct copies of the notice as distributed by *PR Newswire* together with letters confirming publication of the Summary Notice.

SETTLEMENT WEBSITE

12. Rust maintains a website, www.FairfieldGreenwichLitigation.com (the “Website”), that enables Class Members and other individuals to obtain information about the PwC Settlement, as well as the FG, GlobeOp and Citco Settlements, and to access important documents related to these Settlements and to the *Anwar* litigation.

13. The Website contains a listing of the deadlines for submitting a PwC Proof of Claim, requesting exclusion from the PwC Settlement Class and objecting to the PwC Settlement, as well as the date, time and location of the Court’s Settlement Hearing. The

¹ In addition to the above, Rust is in the process of re-mailing 17 PwC Notice Packets to updated addresses provided by the USPS, which was almost entirely passing on such information from foreign postal services. An additional 4 PwC Notice Packets were returned as undeliverable without forwarding addresses. With respect to the latter, Rust is in the process of locating new addresses, if available, through an information supplier to which Rust subscribes, and will promptly re-mail PwC Notice Packets to available updated addresses.

Website also contains links to the PwC Notice, PwC Proof of Claim, and important Court documents including the Preliminary Approval Order, PwC Stipulation of Settlement and decisions and orders of the Court. Since the January 22, 2016 mailing of the PwC Notice Packet, through March 16, 2016, the Website has had 4,500 hits.

TOLL-FREE TELEPHONE HOTLINE

14. Rust operates a toll-free telephone hotline (1-855-263-3450), and a direct dial line for international callers (1-612-359-7949), with an Interactive Voice Response System (“IVR”) and live operators to assist potential Class Members with questions about the Settlement. The IVR and recorded information are available 24 hours a day, 7 days a week. Live operators are available during regular business hours (Monday through Friday 9:00 a.m. to 5:30 p.m. (EST)). All calls to the toll-free telephone hotline and direct dial line have been responded to in a timely manner. Since the mailing of the PwC Notice Packet on January 22, 2016, through March 16, 2016, Rust has received 126 calls on these lines, of which 81 callers requested and spoke with a live operator for assistance.

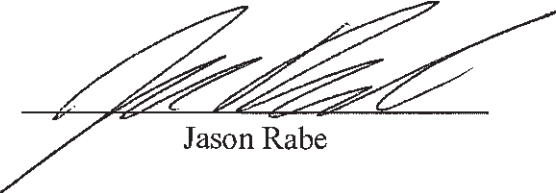
REQUESTS FOR EXCLUSION AND CLAIMS RECEIVED TO DATE

15. The PwC Notice informs Class Members that the deadline for requesting exclusion from the PwC Settlement Class and filing objections is April 1, 2016, and that the deadline for filing PwC Proofs of Claim is May 23, 2016. Only requests for exclusion and PwC Proofs of Claim are submitted to Rust; objections are to be served on counsel and filed with the Court.

16. Through March 16, 2016, Rust has received 4 requests for exclusion from the PwC Settlement Class with an estimated claim value of \$713,968.11; and Rust has received 553 PwC Proof of Claim forms from investors seeking to participate in the PwC Settlement (which Rust

has not yet valued). All requests for exclusion will be addressed in a supplemental submission to be filed with the Court after the April 1, 2016 deadline.

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



Jason Rabe

Sworn to before me this
17th day of March, 2016



Notary Public

