UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

PASHA S. ANWAR, et al.,	
Plaintiffs,	
v.	Master File No. 09-cv-118 (VM) (FM)
FAIRFIELD GREENWICH LIMITED, et al.,	
Defendants.	

SUPPLEMENTAL AFFIDAVIT OF JASON RABE WITH RESPECT TO CLASS NOTICE AND ADMINISTRATION OF THE PWC SETTLEMENT

STATE OF MINNESOTA)
) ss:
COUNTY OF HENNEPIN)

JASON RABE, being first duly sworn, deposes and says:

- 1. I submit this supplemental affidavit to provide the Court with updated information regarding, among other things, 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") (together, the "PwC Notice Packet") and the receipt of requests for exclusion from the Settlement Class. I am a Program Manager for Rust Consulting, Inc. ("Rust"), the Court-appointed Claims Administrator. 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.
- 2. On March 17, 2016, I executed my original affidavit (the "Initial Affidavit") that was filed with the Court on March 18, 2016 [Dkt No. 1562], attesting, among other things, to the

mailing of the PwC Notice Packet and the publication of the Summary Notice once each in the international editions of *The Wall Street Journal* and the dissemination of the Summary Notice for worldwide distribution, including North America, over *PR Newswire*.

- 3. As more fully stated in my Initial Affidavit (at ¶10), as of March 16, 2016, Rust had mailed a total of 5,158 PwC Notice Packets to potential Class Members. Since my Initial Affidavit was executed, during the period from March 17, 2016 through April 21, 2016, inclusive, in response to correspondence or inquiries from potential Class Members, financial institutions, brokers, nominees or record owners, Rust has mailed an additional 24 PwC Notice Packets to potential Class Members. Accordingly, as of close of business April 21, 2016, we have mailed a total of 5,182 PwC Notice Packets to potential Class Members.
- 4. As stated in my Initial Affidavit (at ¶13), on January 22, 2016, Rust posted 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, on a website dedicated Settlement to the PwC and to the Anwar litigation (www.FairfieldGreenwichLitigation.com). From January 22, 2016 through April 21, 2016, the Website has had 6,828 total hits.
- 5. 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, as stated in my Initial Affidavit (at ¶14). From January 22, 2016, the date of initial mailing of the PwC Notice Packet, through April 21, 2016, Rust has received 182 calls on these lines, of which 120 callers requested and spoke with a live operator for assistance.

6. As stated in ¶15 of my Initial Affidavit, the Notice informed Class Members that the deadline for requesting exclusion from the Class was April 1, 2016. Rust has received a total of 542 timely and complete Requests for Exclusion from the Class. The dollar value of the claims reflected in the 542 Requests for Exclusion from the Class calculates to an aggregate Net Loss of principal of approximately \$147.7 million. All of the Requests for Exclusion were received under cover letter from Deminor Recovery Services ("Deminor") or were completed using the same form as the Requests submitted by Deminor (five Requests for Exclusion). The names of these 542 Persons will be included in Exhibit 1 to the proposed Final Judgment of Dismissal with Prejudice (to be filed under seal).

7. Complete copies of all Requests for Exclusion, including all supporting documentation, were provided to Plaintiffs' Lead Counsel.

8. To date, Rust has received a total of 1,086 PwC Proof of Claim forms from Settlement Class Members. We have not yet calculated the value of those claims. In our experience, the vast majority of claim forms are received shortly prior to the deadline for filing claims, which is May 23, 2016 in this case.

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

Jason Rabe

Sworn to before me this 22nd day of April, 2016

Notary Public

ROBERT NEIL JOSEPHSON NOTARY PUBLIC - MINNESOTA My Commission Expires January 31, 2021