

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

| | |
|--|--|
| IN RE BANK OF NEW YORK MELLON CORP. FOREX TRANSACTIONS LITIGATION | No. 12-MD-2335 (LAK) (JLC) |
| THIS DOCUMENT RELATES TO: <i>Southeastern Pennsylvania Transportation Authority v. The Bank of New York Mellon Corporation, et al.</i> <i>International Union of Operating Engineers, Stationary Engineers Local 39 Pension Trust Fund v. The Bank of New York Mellon Corporation, et al.</i> <i>Ohio Police & Fire Pension Fund, et al. v. The Bank of New York Mellon Corporation, et al.</i> <i>Carver, et al. v. The Bank of New York Mellon, et al.</i> <i>Fletcher v. The Bank of New York Mellon, et al.</i> | No. 12-CV-3066 (LAK) (JLC) No. 12-CV-3067 (LAK) (JLC) No. 12-CV-3470 (LAK) (JLC) No. 12-CV-9248 (LAK) (JLC) No. 14-CV-5496 (LAK) (JLC) |

**NOTICE OF LEAD PLAINTIFFS’
MOTION FOR FINAL APPROVAL OF THE SETTLEMENT
AND THE PROPOSED PLAN OF ALLOCATION, AS WELL AS
CERTIFICATION OF THE SETTLEMENT CLASS**

TO: All Counsel of Record:

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 23 and this Court’s July 23, 2015 Notice Order Concerning Proposed Settlement [MDL ECF No. 614], and upon the Joint Declaration of Sharan Nirmul and Daniel P. Chiplock in Support of (1) Lead Plaintiffs’ Motion for Final Approval of the Settlement and the Proposed Plan of Allocation, as Well as Certification of the Settlement Class, and (2) Lead Settlement Counsel’s Motion for Attorneys’ Fees, Reimbursement of Litigation Expenses, and Service Awards to Plaintiffs, together with the exhibits annexed thereto; the Memorandum in Support of Lead Plaintiffs’

Motion For Final Approval of the Settlement and the Proposed Plan of Allocation, as well as Certification of the Settlement Class; Declaration of John C. Coffee, Jr. in Support of Motion for Final Approval of Settlement and an Award of Attorneys' Fees and Service Awards, and Reimbursement of Litigation Expenses; and all other papers and proceedings herein, Lead Plaintiffs will and do hereby move this Court on September 24, 2014 in the Courtroom of the Honorable Lewis A. Kaplan, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 21B, New York, New York 10007, or at such other location and time as set by the Court, for entry of an Order granting final approval of the Settlement and the proposed Plan of Allocation as well as Certification of the Settlement Class.

Dated: August 17, 2015

Respectfully submitted,

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: 

Elizabeth J. Cabraser

Robert L. Lieff

275 Battery Street, 29th Floor

San Francisco, CA 94111-3335

Tel: (415) 956-1000

Fax: (415) 956-1008

Daniel P. Chiplock

Daniel E. Seltz

Michael J. Miarmi

Nicholas Diamand

250 Hudson Street, 8th Floor

New York, NY 10013-1413

Tel: (212) 355-9500

Fax: (212) 355-9592

Interim Co-Lead Counsel for the Customer Classes

KESSLER TOPAZ MELTZER & CHECK, LLP

Joseph H. Meltzer
Sharan Nirmul
Daniel Mulveny
Jonathan Neumann
280 King of Prussia Road
Radnor, PA 19087
Tel: (610) 667-7706
Fax: (610) 667-7056

Interim Co-Lead Counsel for the Customer Classes

McTIGUE LAW LLP

J. Brian McTigue
4530 Wisconsin Avenue, NW
Suite 300
Washington, DC 20016
Tel: (202) 364-6900
Fax: (202) 364-9960

*Counsel for ERISA Plaintiffs: Carl Carver, Deborah Jean
Kenny, Edward C. Day, Joseph F. Deguglielmo, Lisa
Parker, Frances Greenwell-Harrell, and Landol D. Fletcher*