UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: SSA BONDS ANTITRUST LITIGATION	1:16-cv-03711-ER **PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT AGREEMENTS WITH BANK OF AMERICA AND DEUTSCHE BANK**

PLEASE TAKE NOTICE that, upon the filing of the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Settlement Agreements with Bank of America Corporation, Bank of America, N.A., Merrill Lynch International, Bank of America Merrill Lynch International Limited, Merrill Lynch, Pierce, Fenner & Smith Incorporated (collectively, "Bank of America"), and Deutsche Bank AG and Deutsche Bank Securities Inc. (collectively, "Deutsche Bank"), as well as all papers and pleadings submitted therewith, Plaintiffs, through their undersigned counsel, hereby move this Court for an order pursuant to Rule 23 of the Federal Rules of Civil Procedure:

(1) preliminarily approving the Settlements[1] set forth in the Stipulations and Agreements of Settlement with Bank of America and Deutsche Bank;

(2) preliminarily certifying the following Settlement Class for purposes of settlement only:

> All persons or entities who, from January 1, 2005 to the date of the Preliminary Approval Order, entered into an SSA bond transaction with a Defendant; a direct or indirect parent, subsidiary, affiliate, or division of a Defendant; a Released Party; or an alleged co-conspirator, where such Persons were either domiciled in the United States or its territories or, if domiciled outside of the United States or its territories, entered into an SSA bond transaction in the United States or its territories or that otherwise involved United States trade or commerce. Excluded from the Settlement Class are Defendants, their co-conspirators identified herein, and their officers, directors, management, employees, current subsidiaries or affiliates, and all federal governmental entities; provided, however, that Investment Vehicles shall not be excluded from the definition of the Settlement Class;

(3) preliminarily appointing Robbins Geller Rudman & Dowd LLP and Quinn Emanuel Urquhart & Sullivan, LLP ("Lead Counsel") as class counsel for the Settlement Class for purposes of settlement only;

(4) preliminarily appointing Plaintiffs Sheet Metal Workers Pension Plan of Northern California, KBC Asset Management NV, and Iron Workers Pension Plan of Western Pennsylvania as class representatives for the Settlement Class for purposes of settlement only;

[1] Unless otherwise defined herein, all other capitalized terms have the same meaning as set forth in the Settlement Agreements with Bank of American and Deutsche Bank.

(5) staying all proceedings in the Action and any other action alleging any claims released by the Settlement Agreements with respect to Released Parties; and

(6) granting such other and further relief as the Court deems just and proper.

Respectfully submitted,

DATED: New York, New York
August 17, 2017

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CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2017, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/*s*/ Daniel L. Brockett
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