

December 14, 2021

**VIA ECF**

The Honorable Paul A. Engelmayer  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007-1312

Re: *In re JPMorgan Treasury Futures Spoofing Litigation*,  
No. 1:20-cv-03515-PAE (S.D.N.Y.)

Dear Judge Engelmayer:

We write on behalf of the Parties in the above-referenced action. We write to respectfully request that the Court adjourn the scheduled Fairness Hearing from March 4, 2022 (*see* ECF No. 74, ¶ 7) to a date convenient for the Court on or after May 9, 2022.

The Parties seek to adjourn the fairness hearing to a later date to ensure that the Court-appointed Settlement Administrator, A.B. Data, Ltd. (*see* ECF No. 74, ¶ 5) has sufficient time to implement and complete the Court approved Notice Plan (*see* ECF No. 74, ¶¶ 12-16) and to provide additional time for absent class members to review the settlement and determine whether they wish to exercise their rights to object to or opt-out of the proposed settlement (*see* ECF No. 74, ¶¶ 18-24).

In connection with the Motion for Preliminary Approval, Plaintiffs respectfully requested that the Court schedule the Fairness Hearing for a date one hundred fifty (150) calendar days after entry of the Preliminary Approval Order, or at the Court's earliest convenience thereafter. *See* ECF No. 68 at p. 25.<sup>1</sup> As a result, the Parties respectfully request that the Court adjourn the March 4, 2022 Fairness Hearing to a date convenient for the Court on or after May 9, 2022. If the Court adjourns the Fairness Hearing as requested, the remaining dates will be determined based on the dates approved by the Court in the Preliminary Approval Order. *See* ECF No. 74. Counsel for Defendants consent to the requested adjournment. This is the first request for an extension of time in connection with final settlement approval.

For the Court's reference, below are the proposed dates leading up to and after the proposed Fairness Hearing if scheduled on May 9, 2022. The table below includes firm dates based on the Court's entry of the Preliminary Approval Order on December 10, 2021 and the requested adjournment of the Fairness Hearing to May 9, 2022.

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<sup>1</sup> We note for the Court that Appendix A to the Preliminary Approval Brief incorrectly indicates that the Fairness Hearing is proposed for "150 days after the Notice Date." *See* ECF No. 68 at App'x A.

<b>PROPOSED SCHEDULE OF SETTLEMENT EVENTS</b>		
<b>Event</b>	<b>Timing</b>	<b>Deadlines following entry of Preliminary Approval Order on December 10, 2021 (ECF No. 74)</b>
Deadline for mailing the Postcard Notice to Class Members and posting the Notice and Claim Form on the Settlement Website (the "Notice Date") (ECF No. 74, ¶ 12)	45 days after entry of the Preliminary Approval Order	Monday, January 24, 2022
Complete initial distribution of mailed notices (ECF No. 74, ¶ 12)	60 days after entry of the Preliminary Approval Order	Tuesday, February 8, 2022
Deadline for Plaintiffs to file papers in support of final approval and application for fees and expenses (ECF No. 74, ¶ 34)	60 days prior to the Fairness Hearing	Thursday, March 10, 2022
Deadline for requesting exclusion and submitting objections (ECF No. 74, ¶¶ 18, 22)	45 days prior to the Fairness Hearing	Friday, March 25, 2022
Deadline for filing reply papers (ECF No. 74, ¶ 34)	5 days prior to the Fairness Hearing	Wednesday, May 4, 2022
Fairness Hearing	150 days after the entry of the Preliminary Approval Order	Monday, May 9, 2022
Deadline for submitting Claim Forms (ECF No. 74, ¶ 28)	30 days after the Fairness Hearing	Wednesday, June 8, 2022

We thank the Court for its consideration of this request and are available to address any questions the Court may have.

Respectfully submitted,

/s/ Amanda F. Davidoff  
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Sullivan & Cromwell LLP

/s/ Raymond P. Girnys  
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Lowey Dannenberg, P.C.

/s/ Karen M. Lerner  
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*Counsel for Defendants*

*Interim Co-Lead Class Counsel for Class Plaintiffs*

cc: All counsel of record (via ECF)