

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

AXIOM INVESTMENT ADVISORS, LLC,  
by and through its Trustee, Gildor  
Management LLC,

Plaintiff,

v.

BARCLAYS BANK PLC and BARCLAYS  
CAPITAL INC.,

Defendants.

Case No. 15-CV-09323 (LGS)

**PLAINTIFF'S NOTICE OF MOTION FOR FINAL APPROVAL OF CLASS ACTION  
SETTLEMENT AND PLAN OF DISTRIBUTION**

**PLEASE TAKE NOTICE** that pursuant to Federal Rule of Civil Procedure 23(e), this Court's Order Preliminarily Approving Settlement (ECF No. 65) and subsequent Order Approving the Form and Manner of Notice of the Settlement (ECF No. 97), and upon the accompanying memorandum of law, the Declarations of George A. Zelcs, Christopher M. Burke, Jose C. Fraga, Jason Rabe, and Judith van der Werff, the exhibits attached thereto, and the record herein, Plaintiff, by and through its undersigned counsel, will respectfully move this Court, before the Honorable Lorna G. Schofield, United States District Judge, at the United States District Court, Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10004, on July 18, 2017 at 4:30 p.m., or such other location and time as set by the Court, for an order approving the proposed Settlement and approving the proposed Plan of Distribution as fair, adequate, and reasonable. A proposed Judgment and Order granting the requested relief will be submitted with Plaintiff's reply papers, after the deadlines

for objecting to the Settlement and requesting exclusion from the Settlement Class have passed.

Dated: February 28, 2017

SCOTT+SCOTT, ATTORNEYS AT LAW, LLP

s/ Christopher M. Burke  
Christopher M. Burke (CB-3648)  
Walter W. Noss (WN-0529)  
Kate Lv  
707 Broadway, Suite 1000  
San Diego, CA 92101  
Telephone: 619-798-5300  
Facsimile: 619-233-0508

Kristen M. Anderson  
Thomas K. Boardman  
SCOTT+SCOTT, ATTORNEYS AT LAW, LLP  
The Helmsley Building  
230 Park Avenue, 17th Floor  
New York, NY 10169  
Telephone: 212-223-6444  
Facsimile: 212-223-6334

George A. Zelcs  
Robert E. Litan  
Randall P. Ewing, Jr.  
KOREIN TILLERY LLC  
205 North Michigan Plaza, Suite 1950  
Chicago, IL 60601  
Telephone: 312-641-9750  
Facsimile: 312-641-9751

Stephen M. Tillery  
Robert L. King  
Aaron M. Zigler  
Michael E. Klenov  
KOREIN TILLERY LLC  
505 North 7th Street, Suite 3600  
St. Louis, MO 63101  
Telephone: 314-241-4844  
Facsimile: 314-241-3525

Michael D. Hausfeld  
Reena A. Gambhir  
Jeannine M. Keeney  
HAUSFELD LLP  
1700 K Street, NW, Suite 650  
Washington, DC 20006  
Telephone: 202-540-7200  
Facsimile: 202-540-7201

Bonny E. Sweeney  
Michael P. Lehmann  
HAUSFELD LLP  
600 Montgomery Street, Suite 3200  
San Francisco, CA 94111  
Telephone: 415-633-1908  
Facsimile: 415-358-4980

Linda P. Nussbaum  
Bart D. Cohen  
Bradley J. Demuth  
NUSSBAUM LAW GROUP, P.C.  
1211 Avenue of the Americas, 40th Floor  
New York, NY 10036  
Telephone: 917-438-9102

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 28, 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.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Christopher M. Burke  
Christopher M. Burke  
SCOTT+SCOTT, ATTORNEYS AT LAW, LLP  
707 Broadway, Suite 1000  
San Diego, CA 92101  
Telephone: 619-233-4565  
Facsimile: 619-233-0508  
Email: cburke@scott-scott.com