

April 20, 2016

Via ECF

Honorable Lorna G. Schofield
U.S. District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

Re: *Axiom Investment Advisors, LLC, by and through its Trustee, Gildor Management LLC v. Barclays Bank PLC, et al.*
Case No. 1:15-cv-09323-LGS (S.D.N.Y.)

Dear Judge Schofield:

Plaintiff Axiom Investment Advisors, LLC, by and through its Trustee, Gildor Management LLC (“Plaintiff”) writes to advise the Court that Plaintiff and Defendants Barclays Bank PLC and Barclays Capital Inc. (“Barclays,” and together with Plaintiff, the “Settling Parties”) executed a Stipulated and Amended Agreement of Settlement (the “Amended Settlement Agreement”) on April 20, 2016.

Filed concurrently with this letter is an Amended Declaration of George A. Zelcs in Support of Plaintiff’s Motion for Preliminary Approval of Settlement (“Amended Zelcs Decl.”). Attached as Exhibit 1 to the Amended Zelcs Decl. is the Amended Settlement Agreement. A redline comparing the Amended Settlement Agreement to the original and now superseded February 10, 2016 Settlement Agreement (ECF No. 42-1) is attached as Exhibit 8 to the Amended Zelcs Decl.

Because the Settling Parties agreed to revise the “Class” definition (Amended Settlement Agreement, §§2(h), 3(a)), and that definition was incorporated into the proposed Preliminary Approval Order, an updated proposed Preliminary Approval Order has been separately submitted to the Judgments Clerk. A redline comparing the original and updated Preliminary Approval Orders can be found in Exhibit 8 to the Amended Zelcs Decl.

For the reasons set forth in Plaintiff’s Motion for Preliminary Approval of Settlement and documents filed in support thereof, as well as for the reasons stated at the April 7, 2016 hearing on the Motion, Plaintiff respectfully requests that the Court grant preliminary approval of the settlement set forth in the Amended Settlement Agreement and enter the Preliminary Approval Order.

Respectfully submitted,

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