

**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 MOTION FOR APPROVAL OF
NOTICE PLAN AND PLAN OF DISTRIBUTION**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, on July 7, 2016, at 10:40 a.m., at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, in the Courtroom of the Honorable Lorna G. Schofield, Class Plaintiff¹ will, and hereby does, move the Court, pursuant to Fed. R. Civ. P. 23(c)(2) and (e), for entry of an order approving the class notice program and plan of distribution proposed by Class Plaintiff.

In support of the Motion, Class Plaintiff submits herewith:

Exhibit A: [Proposed] Order Approving the Form and Manner of Notice of the Settlement and Preliminarily Approving the Plan of Distribution, with Exhibits 1-4, thereto:

Exhibit 1: [Proposed] Plan of Distribution;

Exhibit 2: [Proposed] Notice of Class Action Settlement;

Exhibit 3: [Proposed] Summary Notice of Class Action Settlement; and

Exhibit 4: [Proposed] Settlement Approval and Distribution Timeline;

¹ Unless otherwise defined herein, all capitalized terms have the meaning ascribed to them in the Settlement Agreement.

along with the Memorandum of Law in Support of Plaintiff's Motion for Approval of Notice Plan and Plan of Distribution and the Declaration of Angela Ferrante Regarding Notice Program, with Exhibits 1-6, thereto.

DATED: June 20, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 20, 2016, 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, and I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List.

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