

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE MF GLOBAL HOLDINGS	:	
LIMITED SECURITIES LITIGATION	:	Civil Action No. 1:11-CV-07866-VM
	:	
THIS DOCUMENT RELATES TO:	:	
	:	
All Securities Actions	:	ECF CASE
( <i>DeAngelis v. Corzine</i> )	:	
	:	

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**SUPPLEMENTAL DECLARATION OF JOSE C. FRAGA  
REGARDING (A) MAILING OF THE NOTICE PACKET; AND  
(B) REPORT ON REQUESTS FOR EXCLUSION RECEIVED**

I, JOSE C. FRAGA, declare as follows:

1. I am a Senior Director of Operations for Garden City Group, LLC (“GCG”).<sup>1</sup> Pursuant to the Court’s Order Preliminarily Approving Proposed Settlement with Certain Underwriter Defendants and Providing for Notice dated December 11, 2014 (ECF No. 808), as amended by letter endorsement dated March 13, 2015 (ECF No. 872), and the Order Preliminarily Approving Proposed Settlement with Commerz Markets LLC and Providing for Notice dated March 17, 2015 (ECF No. 881) (collectively, the “Preliminary Approval Orders”), GCG was authorized to act as Notice Administrator in connection with the Underwriter Settlement and Commerz Settlement in the above-captioned Action.<sup>2</sup> I submit this Declaration as a supplement to my earlier declaration, the Declaration of Jose C. Fraga Regarding (A)

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<sup>1</sup> GCG was formerly known as The Garden City Group, Inc.

<sup>2</sup> All terms with initial capitalization not otherwise defined herein have the meanings ascribed to them in the Stipulation and Agreement of Settlement with Certain Underwriter Defendants, dated as of November 24, 2014 (ECF No. 801-1) (the “Underwriter Stipulation”), the Stipulation and Agreement of Settlement with Defendant Commerz Markets LLC, dated as of March 17, 2015 (ECF No. 875-1) (the “Commerz Stipulation”) or the Joint Declaration of Salvatore J. Graziano and Javier Bleichmar in Support of Lead Plaintiffs’ Motion for Final Approval of Underwriter Settlement and Settling Plaintiffs’ Motion for Final Approval of Commerz Settlement (ECF No. 933) (the “Joint Declaration” or “Joint Decl.”).

Mailing of the Notice Packet; (B) Publication of the Summary Notices; and (C) Report on Requests for Exclusion Received to Date dated May, 2015 that was attached as Exhibit 1 to the Joint Declaration filed with the Court on May 15, 2015 (ECF No. 933-1) (the “Mailing Declaration”). I have personal knowledge of the facts stated herein, and if called on to do so, I could and would testify competently thereto.

**MAILING OF THE NOTICE PACKET**

2. As more fully described in the Mailing Declaration, GCG caused copies of the Underwriter Notice and the Commerz Notice (together, the “Notices” or the “Notice Packet”) to be mailed by first-class mail to the 1,966 brokers and other nominees in GCG’s proprietary database of the largest and most common U.S. banks, brokerage firms, and nominees. *See* Mailing Declaration ¶ 2.

3. GCG received requests from nominees (i) for additional unaddressed copies of the Notice Packet for them to forward to beneficial owners; and (ii) for GCG to mail Notice Packets directly to potential members of the Settlement Classes identified by the nominees. Through May 13, 2015, GCG mailed an additional 1,228 Notice Packets to nominees who requested Notice Packets to forward to their customers and 50,963 Notice Packets to potential members of the Settlement Classes whose names and addresses were received from individuals or nominees requesting that a Notice Packet be mailed to such persons. *See* Mailing Declaration ¶ 4.

4. Since May 13, 2015, GCG has received requests for 5,017 additional Notice Packets of which 1,700 were to be sent to nominees to forward to their customers and 3,317 were to be sent by GCG directly to potential members of the Settlement Classes whose names and addresses were received from nominees or individuals. Each of the requests was responded to in a timely manner.

5. Through June 17, 2015, GCG has disseminated a total of 59,174 Notice Packets to potential members of the Settlement Classes and nominees by first-class mail. In addition, GCG has remailed 199 Notice Packets to persons whose original mailing was returned by the U.S. Postal Service and for whom updated addresses were provided to GCG by the Postal Service.

**TELEPHONE HELPLINE AND WEBSITE**

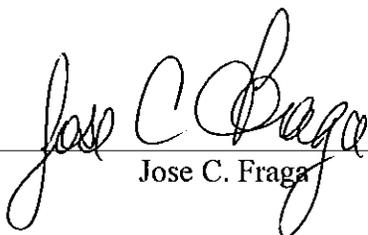
6. GCG continues to maintain the toll-free telephone number (1-877-940-5045) and interactive voice response system to accommodate any inquiries from potential members of the Settlement Classes. GCG also continues to maintain the dedicated website for the Action ([www.MFGlobalSecuritiesClassAction.com](http://www.MFGlobalSecuritiesClassAction.com)) in order to assist potential members of the Settlement Classes. On March 30, 2015, the Notices, the Underwriter Stipulation, and the Commerz Stipulation, among other relevant documents, were made available for downloading from the website. See Mailing Declaration ¶ 9. On May 15, 2015, copies of the papers filed in support of the motions for final approval of the Underwriter Settlement and the Commerz Settlement were posted to the website. GCG will continue maintaining and, as appropriate, updating the website and toll-free telephone number until the conclusion of the administration.

**REPORT ON EXCLUSION REQUESTS RECEIVED**

7. The Notices informed potential members of the Settlement Classes that requests for exclusion from the Settlement Classes were to be mailed or otherwise delivered, addressed to *In re MF Global Holdings Limited Securities Litigation*, EXCLUSIONS, c/o Garden City Group, LLC, P.O. Box 10164, Dublin, OH 43017-3164, such that they were to be received by GCG no later than May 29, 2015. GCG has been monitoring all mail delivered to that Post Office Box. Through June 18, 2015, GCG has not received any requests for exclusion.

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

Executed in Lake Success, New York on June 18 2015.

  
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Jose C. Fraga