

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

In re:)	
)	CIVIL ACTION NO.
BANK OF NEW YORK MELLON CORP.)	MASTER FILE
FOREX TRANSACTIONS LITIGATION)	12 MD 2335 (LAK)
)	
This Document Relates to: 11-CV-09175)	
)	
)	

**NOTICE OF LEAD PLAINTIFF’S MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and this Court’s Notice Order Concerning Proposed Settlement dated July 23, 2015, and upon: (i) the Declaration of John C. Browne in Support of: (A) Lead Plaintiff’s Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (B) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses; (ii) the Memorandum of Law in Support of Lead Plaintiffs’ Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (iii) all other papers and proceedings herein, Lead Plaintiff, the State of Oregon, by and through the Oregon State Treasurer on behalf of the Common School Fund and, together with the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund, on behalf of itself and the settlement class, will and does hereby move this Court, before the Honorable Lewis A. Kaplan, on October 20, 2015 at 10:00 a.m. in Courtroom 21B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, or at such other location and time as set by the Court, for entry of a judgment

approving the settlement as fair, reasonable and adequate and for entry of an Order approving the proposed plan of allocation as fair, reasonable and adequate.

Dated: September 15, 2015

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

/s John C. Browne _____

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