

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

PAUL SHAPIRO, on behalf of himself as an individual, and on behalf of all others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE & CO., JPMORGAN CHASE BANK, N.A., J.P. MORGAN SECURITIES LLC, and J.P. MORGAN SECURITIES, LTD.,

Defendants.

Case No.:11-CV-8331 (CM)(MHD)  
ECF CASE

STEPHEN and LEYLA HILL, on behalf of themselves as individuals, and on behalf of all others similarly situated,

Plaintiffs,

v.

JPMORGAN CHASE & CO., JPMORGAN CHASE BANK, N.A., J.P. MORGAN SECURITIES LLC, and J.P. MORGAN SECURITIES, LTD.,

Defendants.

Case No. 11-CV-7961 (CM)  
ECF CASE

**CLASS PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR  
DISTRIBUTION OF THE NET SETTLEMENT FUND**

**PLEASE TAKE NOTICE** that, upon the accompanying Declaration of Vineet Sehgal of AlixPartners, LLP ("AlixPartners") in Support of Motion for Distribution of the Class Settlement Fund (the "Sehgal Declaration"), submitted on behalf of the Court-appointed Claims Administrator, AlixPartners, and the Memorandum in Support of Class

Plaintiffs' Motion for Distribution of the Class Settlement Fund, and pursuant to Federal Rule of Civil Procedure 23(e), Settling Class Plaintiffs hereby move this Court, before the Honorable Colleen McMahon, United States District Judge, to enter the accompanying [Proposed] Order Granting Class Plaintiffs' Unopposed Motion for Distribution of the Class Settlement Fund to Authorized Claimants, which will, *inter alia*: (i) approve distribution of the Class Settlement Fund; (ii) approve Co-lead Counsel and AlixPartners' administrative determinations accepting and rejecting Claims as set forth in the Sehgal Declaration; (iii) direct the distribution of the Class Settlement Fund to Settlement Class Members whose Claims have been accepted as valid and approved by the Claims Administrator; (iv) provide for a second distribution of any funds remaining after the initial distribution as detailed in the Sehgal Declaration, if appropriate and for *cy pres* of any remaining ; (v) direct that distribution checks state that the check must be cashed within 120 days after the issue date; (vi) direct that authorized participants will forfeit all recovery from the Settlement if they fail to cash their distribution checks in a timely manner; (vii) release claims related to the claims administration process; (viii) authorize the destruction of paper copies of Proof of Claim forms one year after the distribution of the Class Settlement Fund, and destruction of electronic copies of the same three years after the distribution of the Class Settlement Fund; and (ix) provide that the Court retains jurisdiction to consider any further applications concerning the administration of the Settlement, and such other and further relief as the Court deems appropriate.

Dated: November 7, 2014  
New York, New York

**ENTWISTLE & CAPPUCCI LLP**

*/s/ Andrew J. Entwistle*

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*/s/ Reed R. Kathrein*

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 7, 2014, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List.

/s/ Jason A. Zweig  
JASON A. ZWEIG