

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GREGORY BOUTCHARD and SYNOVA
ASSET MANAGEMENT, LLC, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

KAMALDEEP GANDHI, YUCHUN MAO
a/k/a BRUCE MAO, KRISHNA MOHAN,
TOWER RESEARCH CAPITAL LLC, and
JOHN DOE NOS. 1-5,

Defendants.

Case No. 1:18-cv-07041

Hon. John J. Tharp, Jr.

**DECLARATION OF GREGORY BOUTCHARD IN SUPPORT OF
CLASS PLAINTIFFS' REQUEST FOR AN INCENTIVE AWARD**

I, Gregory Boutchard, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I respectfully submit this declaration in support of Class Plaintiffs' application to the Court for an incentive award for my service as a representative of the Class. The statements herein are true to the best of my personal knowledge, information and belief.

2. I have been investing in the futures market for more than ten years, and for many of those years (including during the Class Period) futures trading was my main source of income. As a conscientious investor in the futures markets, it is important to me that these markets operate fairly. That is why I felt strongly that the manipulation at issue in this litigation had to be addressed and I stepped forward to serve as a Class Plaintiff.

3. I first became involved in this case in or around October 2018, at the outset of the case. I was the sole plaintiff to file the initial complaint and have remained a party to this action ever since. ECF No. 1.

4. As a Class Plaintiff, I understood my responsibilities to include, among other things: (a) taking all necessary steps to further the litigation and to vindicate the rights of all Class Members; (b) providing Lead Counsel and the Court with all of the relevant facts and documents necessary to pursue the action; (c) making myself available to Lead Counsel as needed to review draft pleadings and motions and to otherwise oversee the litigation; (d) testifying at deposition and/or trial, if it became necessary; (e) staying informed regarding the progress of the lawsuit; and (f) otherwise assisting Lead Counsel in prosecuting the action.

5. During this litigation, I performed the following specific tasks, among others:

- gathering all of my trading records for the Class Period, which took approximately two weeks to complete and required me to hire a temporary assistant to help with gathering, sorting, organizing, and uploading these voluminous documents;
- reviewing my records with Lead Counsel for purposes of drafting and reviewing the allegations in the complaints related to my trading;
- reviewing all of the pleadings filed in this action;
- reviewing all motions filed in this action and discussing Class Plaintiffs' opposition to Defendants' motions to dismiss with Lead Counsel;
- overseeing settlement negotiations conducted between Lead Counsel and Tower; and
- regularly speaking with Lead Counsel—at least once per month, on average—to monitor the progress of the litigation, motions, and settlement talks.

6. From October 2018 through the present, I conservatively estimate that I spent at least fifty (50) hours performing my work as Class Representative, including completing the items outlined above.

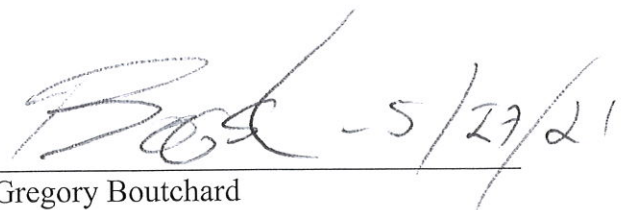
7. I believe that if I had contracted to perform similar work on an hourly basis, I would be compensated at a rate of \$300 per hour based on my skills and experience.

8. In addition to the work that I performed as Class Plaintiff, I also suffered professionally as a result of my service to the Class. Throughout the course of this litigation, numerous recruiters and investment funds have commented negatively regarding my role as Class Plaintiff here during the course of discussions concerning my prospective employment as a futures trader. Based on these conversations, I believe that my role here has diminished my ability to find work as a futures trader.

9. I respectfully request that the Court approve an incentive award in an amount commensurate with my contributions as a Class Plaintiff, which efforts I believe were essential to obtaining this \$15 million settlement for the benefit of the Class.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on May 27, 2021

 - 5/27/21
Gregory Boutchard