

**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.

**SUPPLEMENTAL DECLARATION OF STEVEN J. STRAUB
ON BEHALF OF A.B. DATA, LTD. REGARDING
REQUESTS FOR EXCLUSION RECEIVED AFTER JUNE 10, 2021**

Pursuant to 28 U.S.C. §1746, I, Steven J. Straub, declare:

1. I am the Senior Project Manager of Client Services of A.B. Data, Ltd.’s Class Action Administration Division (“A.B. Data”). I am over 21 years of age and am not a party to the above-captioned action. My business address is 600 A.B. Data Drive, Milwaukee, WI 53217, and my telephone number is (414) 961-7551. A.B. Data was authorized to act as the Settlement Administrator in connection with the settlement with Tower Research Capital LLC (“Tower”) in the above-captioned action (the “Action”).¹ I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

¹ Unless otherwise noted, capitalized terms not defined herein have the same meaning as in the Mailed Notice and the Stipulation and Agreement of Settlement dated January 22, 2021 (the “Settlement Agreement”). ECF No. 125-1.

2. I submit this Declaration to supplement my two earlier declarations: the Declaration of Steven J. Straub on Behalf of A.B. Data, Ltd. Regarding Notice and Claims Administration, dated May 27, 2021 (ECF No. 138) (the “Initial Mailing Declaration”), which provided the Court with information regarding the implementation of the notice plan; and the Supplemental Declaration of Steven J. Straub On Behalf of A.B. Data, Ltd. Regarding Report On Requests for Exclusion, dated June 17, 2021 (ECF No. 146) (the “Supplemental Declaration”), which provided the Court with information regarding the administration of the Settlement Agreement and all objections and requests for exclusion received as of the June 10, 2021 deadline.

UPDATED REPORT ON REQUESTS FOR EXCLUSION RECEIVED

3. The Notice informed potential members of the Class that Requests for Exclusion from the Class were to be mailed or otherwise delivered such that they are received by June 10, 2021.

4. As reported in the Initial Mailing Declaration and the Supplemental Declaration, A.B. Data received two (2) Requests for Exclusion that were sent on or before June 10, 2021.


5. As of the date of this Declaration, one (1) additional Request for Exclusion (the “SSGL Request”) has been received from Saham Sabah Global Ltd. (“SSGL”). This Request was submitted via email on June 24, 2021. A true and correct copy of this Request for Exclusion is attached hereto as Exhibit A.

6. The SSGL Request was sent to info@eminifuturesclassactionsettlement.com, an email account that A.B. Data created to communicate with Class Members concerning the administration of the Settlement.

7. A summary of the Requests for Exclusion is attached hereto as Exhibit B.

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

Executed this 14th day of July 2021.



Steven Straub

EXHIBIT

A

Tower Research Capital

- 54414

108520156



JUN 24 2021

-----Original Message-----

From: Isabelle Raymond [<mailto:isabelle.raymond@sahamsabah.com.my>]

Sent: Thursday, June 24, 2021 2:24 AM

To: info@eminifuturesclassactionsettlement.com

Cc: Meherun Mohd; Hassan Abbas

Subject: EXCLUSIONS from E-Mini Futures Class Action Settlement

EXTERNAL SENDER

To whom it may concern

Greetings from Saham Sabah Global Ltd!

We are well aware that the written request must be mailed or delivered to the P.O.Box address provided, however our initial express courier was returned as the courier provider does not provide P.O.Box service. We then approached the only courier service provider that delivers to a P.O.Box, however this service is put on hold as our country is currently in the midst of a Movement Control Order due to the pandemic.

Since we have no other means to mail the letter, we enclose a scanned copy of the said written Request for Exclusion together with the proof of authorization.

Kind regards
Isabelle

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This email has been checked for viruses by Avast antivirus software.

<https://www.avast.com/antivirus>



Saham Sabah Global Ltd. (LL08389)

9 June 2021

Saham Sabah Global Ltd
Lot 1, 2nd Floor, Wisma Siamloh,
Jalan Kemajuan,
87007 Federal Territory of Labuan,
Malaysia
Tel: +6087 – 417810
Fax: +6087 – 424220

E-Mini Futures Class Action Settlement – EXCLUSIONS
c/o A.B. Data, Ltd.
P.O.Box 173001
Milwaukee, WI 53217
United States of America.

Sir,

REQUEST FOR EXCLUSION

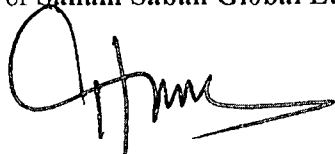
We, **Saham Sabah Global Ltd** (Co. Registration No. LL08389) of Lot 1, 2nd Floor, Wisma Siamloh, Jalan Kemajuan, 87007 Federal Territory of Labuan, Malaysia hereinafter referred to as SSGL wish to be excluded from the Settlement Class in the Action (Boutchard et al. v. Gandhi et al., Case No. 18-cv-7041 (N.D. 111)).

It is understood that upon exclusion, SSGL shall have no rights under the Settlement, shall not share in the distribution of the Net Settlement Fund, and shall not be bound by the Settlement.

Kindly contact our Senior Finance Manager, Ms Meherunnisa at +6088 – 264633 should you require any further information.

Thank you.

Yours faithfully
For **Saham Sabah Global Ltd**



HASSAN ABBAS
Chief Executive Officer

Saham Sabah Global Ltd

(LL08389)

(Incorporated in Labuan, Malaysia)

**APPROVAL FOR SAHAM SABAH GLOBAL LTD TO BE EXCLUDED
FROM THE PROPOSED CLASS ACTION SETTLEMENT**

The following is the Board of Directors' resolutions duly passed on 9th June 2021:-

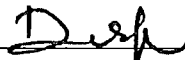
"As recommended by the Management in the proposal as annexed hereto and pursuant to the authority given under Article 55 of the Company's Articles of Association, we the undersigned, being all Directors of **SAHAM SABAH GLOBAL LTD** hereby **RESOLVED THAT APPROVAL** be and hereby given for the following:

- A) For Saham Sabah Global Ltd to exclude itself from the Settlement; and
- B) The Chief Executive Officer to act as the Authorised Representative for Saham Sabah Global Ltd on the Request for Exclusion."

CERTIFIED TRUE EXTRACT



DATUK NELLIE SIKODOL
Director



AISAH SAYADI
Company Secretary
(CP201908000486 / LS 0008495)

Dated: 09 JUN 2021

EXHIBIT

B

**Towers Research Settlement
Exclusion Report**

Name	Exclusion ID #	Postmark	Timely?	Name?	Address?	Phone?	Name of Actions?	Signed?	If entity, proof of Auth?
1. Nordea Bank S.A.	108520152	5/4/2021	Yes	Yes	Yes	Yes	Yes	Yes	Yes
2. Blue Capital SA	108520153	4/21/2021	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3. Saham Sabah Global Ltd.	108520156	6/24/2021	No	Yes	Yes	Yes	Yes	Yes	Yes