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September 8, 2026

VIA ECF

The Honorable Katherine Polk Failla
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: Settlement Distribution Status Update
Iowa Pub. Emps. ' Ret. Sys. et al. v. Bank of Am. Corp. et al., No. 17-cv-6221 (KPF)

Dear Judge Failla:

Pursuant to the Court's Orders of July 29, 2026 and August 25, 2026, we write with a status update on the progress of claims administration.

As the Court may recall, in our last letter we reported that Epiq had delivered its last initial deficiency notices on August 10, with deadlines for responses by August 31. Of the 93 defect notices covering 11,411 claims, Epiq received 16 timely responses covering 1,321 claims. Each of these has been fully processed, and Epiq has completed quality assurance reviews of each to ensure the responses did not introduce new defective claims. Epiq has also completed "roll up" calculations totaling Credited Claim Values for all transactions in each claim. Epiq is up to date in responding to all inquiries from Claimants and has performed additional quality assurance reviews to identify duplicate claims or claims that may have been submitted on behalf of Claimants excluded from the Settlement Classes. It has performed a reconciliation to ensure that all submitted data files have been imported accurately.

A handful of discrete issues remain. In two claims, new defects were found to have been introduced with the Claimant's response to Epiq's defect notice. With counsel's approval, Epiq has issued follow-up defect notices for these claims, with response deadlines of September 14. Three Claimants timely asked for extensions to their deadlines for responding to defect notices; in light of the extensive transaction records involved for some Claimants, counsel approved an extension for these claims until September 14. As of Tuesday morning, September 8, two Claimants have submitted a late response to Epiq's initial defect notice.

We plan to accept and process any response to a defect notice received by close of business on Monday, September 14, but to bar further submissions or disputes after that date and have Epiq's decisions based on the information submitted before September 14 be final. We hope this will allow us to move for distribution and bring any disputes before the Court.

Pursuant to the Court's direction to file status updates every two weeks, we expect to file another update on Monday, September 21, with updates on any further responses to Claimant defect notices; the status of final award calculations; and the timeline for a motion to distribute.

Respectfully submitted,

/s/ Michael B. Eisenkraft

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/s/ Daniel L. Brockett

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Co-Lead Counsel for Plaintiffs

The Court thanks Plaintiffs for the status update and for their diligent efforts to prepare for distribution. Plaintiffs are directed to provide a further status update to the Court regarding distribution on or before **September 21, 2026**.

Dated: September 9, 2026
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE