

Distribution, Inc.; Prime Dealer Services Corp.; and Strategic Investments I, Inc); the UBS defendants (UBS AG; UBS Americas Inc.; UBS Securities LLC; and UBS Financial Services Inc.); and the EquiLend defendants (EquiLend LLC; EquiLend Europe Limited; and EquiLend Holdings LLC) (all such defendants together, the “Newly Settling Defendants” herein) pursuant to Rule 23 of the Federal Rules of Civil Procedure, certifying the Settlement Class, and appointing Class Counsel and Class Representatives for the Settlement Class. This [Proposed] Preliminary Approval Order has been agreed to by Plaintiffs and the Newly Settling Defendants and consists of:

- (1) preliminarily approving the settlement set forth in the New Settlement Agreement;
- (2) preliminarily certifying the Settlement Class as defined in the New Settlement Agreement for purposes of settlement only;
- (3) preliminarily appointing Quinn Emanuel Urquhart & Sullivan, LLP and Cohen Milstein Sellers & Toll PLLC as Co-Lead Counsel for the Settlement Class;
- (4) preliminarily appointing Plaintiffs as class representatives for the Settlement Class;
- (5) ordering that Plaintiffs shall, at a later practicable date, submit for the Court’s approval a proposed Plan of Allocation of the New Settlement Amount and a proposed notice plan;
- (6) preliminarily approving Epiq Class Action & Claims Solutions, Inc. as Settlement Administrator, the Huntington National Bank as Escrow Agent and preliminarily approving certain administrative expenses to be paid as agreed to by the parties in the New Settlement Agreement;
- (7) preliminarily approving the establishment of escrow accounts under the New Settlement Agreement as Qualified Settlement Funds;
- (8) staying all proceedings in the action with respect to the Newly Settling Defendants; and
- (9) granting such other and further relief as the Court deems just and proper.

DATED: August 23, 2023

Respectfully submitted,

**COHEN MILSTEIN SELLER & TOLL
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