

March 11, 2022

**Via ECF**

Honorable Lorna G. Schofield  
U.S. District Court  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, NY 10007

Re: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*  
Case No. 1:13-cv-07789-LGS

Dear Judge Schofield:

Pursuant to the Seventh Amended Civil Case Management Plan and Scheduling Order entered in this action (ECF No. 1454), Plaintiffs and Credit Suisse Securities (USA) LLC, Credit Suisse Group AG, and Credit Suisse AG (“Credit Suisse”) submit this joint status letter.

**I. Motions**

On February 1, 2022, the Court issued its opinion and order denying Credit Suisse’s motion for summary judgment and Plaintiffs’ motion for summary judgment. ECF No. 1650.

No motions are currently pending before the Court. As provided for in the Court’s February 3, 2022 Scheduling Order, motions *in limine* are due by August 12, 2022 and responses are due on August 19, 2022. ECF No. 1653. Joint requests to charge, proposed *voir dire*, joint verdict sheet, and any memorandum of law, as provided for in the Court’s individual rules, are due by August 19, 2022. *Id.* The parties’ joint final pretrial order is due by August 26, 2022. *Id.*

**II. Discovery**

**A. Depositions**

Depositions have concluded. In total, Credit Suisse took 27 depositions of the Plaintiffs and/or their investment advisors. Plaintiffs took 55 fact depositions, two objector depositions, and eight Rule 30(b)(6) depositions of Defendants, including Credit Suisse. Of the 55 fact depositions taken by Plaintiffs, 26 witnesses invoked the Fifth Amendment protection against self-incrimination. In addition, the parties took and defended 14 expert depositions.

**B. Remaining Deadlines**

There are no other remaining discovery deadlines.

**III. Litigation Class Notice**

Plaintiffs have completed disseminating notice to potential Class Members that have been identified in the records maintained by the Claims Administrator. On November 29, 2021, the Court entered an Order Approving Requests for Exclusion from the Certified Litigation Class. ECF No. 1632; *see also* ECF No. 1649.

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**IV. Settlement**

No settlement discussions have occurred since the entry of the summary judgment order.  
*See* ECF No. 1650.

**V. Next Joint Status Letter**

The parties will submit their next joint status letter on Friday, May 13, 2022.

Respectfully submitted,

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