

3. The Claims Administrator has received in excess of 10 million proof of claim forms related to the Currency Conversion Fee Antitrust Litigation. These forms were submitted utilizing various methods and entered into various databases. Forms were submitted by first-class mail, certified mail, express carrier, facsimile transmission, electronic transmission over the internet and by forms sent directly to the Plaintiffs' counsel who, in turn, sent them to the Claims Administrator. Duplicate claim forms may have been received as claimants submitted forms more than once (*e.g.*, one form was sent electronically with a duplicate form sent via mail). There were also cases where claimants submitted more than one option form (*e.g.*, they completed and submitted each of the three options). Because all claims received were processed, the gross count of the claims includes duplicates. To obtain a preliminary count of unique claims, we developed a program that identifies potential duplicate claims in the databases. The results of this de-duping program or procedure are *preliminary* because further steps will be taken during the auditing and claim validation process to identify and remove additional duplicate claims.

The preliminary de-duping process used by the Claims Administrator is described below. First, a list of parameters were generated that would be searched for matching data. If a search of these parameters yielded a match among several claims, then the claims would be earmarked as potential duplicates. The parameters employed were:

- All pertinent information is the same
- Refund ID, Last Name, First Name
- Last Name, SSN (if SSN field is not blank)
- Last Name, First Initial, SSN (if SSN field is not blank)
- Last Name, First Name, Address
- Last Name, First Name, Zip Code
- Last Name, First Name, Amount
- Last Name, First Name, Address, Amount
- Last Name, First Name, Zip Code, Amount
- Last Name, First Name, Address, Number of Days
- Last Name, First Name, Zip Code, Number of Days

Other criteria were also considered and rejected because it was found that they did not accurately identify potential duplicate claims. For example, a search using just the address was attempted, but this search protocol yielded almost 3 million hits. A review of the data from this search revealed that many claims shared similar P.O. Box numbers that were listed in different cities or countries. Another attempted search protocol examined the IP address of the computer used to submit the electronic claim, but this search yielded over 2 million hits. There a number of reasons why this particular search generated so many hits, including, for example, the fact that AOL uses only a few IP addresses throughout the country that are shared by numerous users, and that claimants filing from the same publicly accessible computer, *e.g.*, at a library, would have the same IP address.

Because some of the search criteria used in the preliminary de-duping process overlapped, the de-duping analysis was performed in multiple steps. The de-duping process began with a search of the entire database for each of the parameters listed above. This step identified groups of suspected duplicates which were listed in a separate report. Next, a ranking program was applied to the report of potential duplicates. The program ranked the suspected duplicate claims according to claim value. Therefore, where a claimant submitted multiple claim options, the program would rank the lower valued claim as a duplicate, *e.g.*, an Option 1 claim would be marked as a duplicate in favor of an Option 2 claim, and an Option 2 claim would be marked as a duplicate in favor of an Option 3 claim (provided that the Option 3 form had a transaction value and was not blank). Similarly, if multiple claims were submitted for the same Option, then the higher valued claim was designated the "original" or "unique" claim with the remaining lower valued claim (or claims) designated as the duplicate(s). Finally, all claims marked as a duplicate were excluded from the summation of total claims, and a net claim count was determined. Notices of rejection will be sent to any claimant where there may be a question

as to whether the claim is an actual duplicate (e.g., two option 3 claims that meet the criteria for duplicates, however, two different loss amounts are listed).

4. Through July 1, 2008, HR&S has received the following number of timely-filed claims:

Proof of Claim Forms - Timely

Electronic Claim Forms – Option 1	3,416,231
Electronic Claim Forms – Option 2	1,291,172
Electronic Claim Forms – Option 3	135,869
Paper Claim Forms – Option 1	3,953,010
Paper Claim Forms – Option 2	1,343,010
Paper Claim Forms – Option 3	95,927
Agency/Company Claims	301
Claim Forms filed from original mailing	<u>109,466</u>
Total Claim Forms Through 07/01/08	<u>10,344,986</u>

The results of the preliminary de-duping analysis are:

Option 1	168,828
Option 2	33,867
Option 3	26,454
Agency/Company Claims	<u>1</u>
Total	<u>229,150</u>

5. During the period through the claims filing deadline of May 30, 2008, when the on-line claim option was available to class members, data from electronic Option 1 claims was entered into the master database on a daily basis. Option 1 paper claim information is entered into the master database within a few days after receipt of the claim. As of July 1, 2008, all Option 1 paper proof of claim forms have been entered into the master database. Through July 1, 2008, HR&S has received 7,369,241 Option 1 proof of claim forms. This number was reduced to 7,200,413 after applying the results of the preliminary de-duping analysis.

6. During the period when the on-line claim option was available to class members, data from electronic Option 2 claims was entered into the master database on a daily basis. We have also entered into the master database the information from all Option 2 paper claims received to date. Through July 1, 2008, HR&S has received 2,634,182 Option 2 proof of claim forms. This number was reduced to 2,600,315 after applying the results of the preliminary de-duping analysis. The number of days claimed on the Option 2 claims currently in the master database is 508,832,973 but was reduced to 500,869,987 after preliminary de-duping. A stratification of the gross Option 2 proof of claim forms sorted by days claimed is as follows:

<u>Days Claimed</u>	<u>Number of Claims</u>
0	40,470
1 – 10	40,399
11 – 20	168,459
21 – 50	632,623
51 – 80	416,882
81 – 100	216,620
101 – 200	544,775
201 – 500	372,459
501 – 3,934	<u>201,495</u>
Total	<u><u>2,634,182</u></u>

The number of days claimed rely on the face value of the claims, without benefit of any auditing of the atypically large number of day claims. Any claimant who claimed more than 3,934 days (the maximum number of days in the class period) has been reduced to 3,934 days in the above schedule.

7. During the period when the on-line claim option was available to class members, data from electronic Option 3 claims was entered into the master database on a daily basis. All of the information from the Option 3 paper claims has been entered into the master database. Through July 1, 2008, HR&S has received a total of 341,262 Option 3 proof of claim forms filed by individual claimants.¹ This number was reduced to 314,808 after applying the results of the preliminary de-duping analysis. We

¹ The term Option 3 is used here to refer to the original proof of claim forms, as well as the subsequently mailed Option 3 claim forms, which are comparable in format.

also received 301 Agency/Company claims filed via the agency/company submission process (which requires that the claim data be submitted in an encrypted Excel spreadsheet that is sent to HR&S on a computer disk). This number was reduced to 300 after applying the results of the preliminary de-duping analysis. Based on an analysis of the foreign transaction amounts claimed by Option 3 claimants contained in the master database and the claimed foreign transactions amounts for 295 of the Agency/Company claims (as noted below, 6 claims are unreadable), we have made an initial assessment of the approximate value, or "face value", of these claims. The face value of the foreign transactions for these claims (Option 3 and Agency/Company Claims) was \$15,102,462,723 prior to de-duping. Of this amount, \$11,350,597,914 is attributed to the Option 3 claimants and \$3,751,864,809 is attributed to the 295 readable Agency/Company claimants. After preliminary de-duping, the total transaction amount for Option 3 claimants was reduced to \$10,998,344,659, the Agency/Company amount was reduced to \$3,751,854,402 and the overall total to \$14,750,199,061.

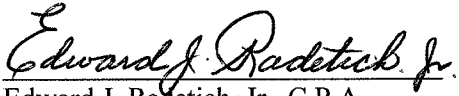
The face value amount for the Agency/Company claims will be subject to further revision, in part, because the submission disks for 6 of these claims could not be processed as these disks were either unreadable or formatted incorrectly. We have been working with each of these Agency/Company claimants to resolve these issues. Additionally, the Claims Administrator has received 55 late claims through July 9, 2008 that were postmarked after the deadline period.

8. We continue to open and process the mail received on a daily basis. We are continuing to identify both timely- and late-filed claims among the mail received after the May 30, 2008 deadline. We have determined that approximately 22,000 claims received through July 9, 2008 were postmarked after the May 30, 2008 deadline.

9. We received a total of 2,910 Requests for Exclusion through July 9, 2008. Each request has been recorded in a log and submitted to counsel. Two of the Requests for Exclusion were subsequently rescinded as both individuals opted to file a claim before the claim deadline expired. The

remaining 2,908 Requests for Exclusion include 30 requests² which were not postmarked by the February 14, 2008 deadline and which are not included in the "Exhibit A" attached as supplemental material with the Plaintiffs' Notice of Filing of Status Report Concerning the De-Duping of Claims and the Settlement Administration process.

I declare under penalty of perjury that the forgoing is true and correct. Executed this 14th day of July, 2008, at Philadelphia, Pennsylvania.


Edward J. Radetich, Jr., C.P.A.

² The status report of Edward J. Radetich filed with the Plaintiffs' Notice of Filing of Settlement Notice and Claims Process Status Report, dated June 9, 2008, indicated there were 32 late filed Requests for Exclusion. The Claims Administrator has determined that 3 of these requests were in fact filed timely, however we also received an additional late exclusion, therefore the number of late-filed Requests for Exclusion is 30.