

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE CURRENCY CONVERSION FEE ANTITRUST LITIGATION	MDL No. 1409 M 21-95 Judge William H. Pauley, III
THIS DOCUMENT RELATES TO: ROBERT ROSS et al., Plaintiffs, -against- BANK OF AMERICA, N.A. (USA) et al., Defendants.	05 CV 7116 (WHP)

DECLARATION OF MEGAN S. WEBSTER

I, Megan S. Webster, hereby declare as follows:

1. I am a vice president and senior counsel of HSBC. I have been involved with the Change in Terms Notice that HSBC is sending to its consumer and small business cardholders in May 2010 made in connection with the settlement in the above-captioned litigation.

2. On or about May 12, 2010, HSBC began mailing the Change in Terms Notice to its existing cardholders.

3. Mailing of the Change in Terms Notice to its pre-existing cardholders will be substantially complete by May 31, 2010.

4. The Change in Terms Notice is being sent with a cover letter. This mailing summarizes changes to the Cardmember Agreement including, among other things, that HSBC is removing the arbitration clause and class action waiver provision from the Cardmember


Agreement. As an exemplar, a common version of the Change of Terms Notice and accompanying cover letter is attached hereto as Exhibit A.

5. HSBC sent the Change in Terms Notice and accompanying cover letter described above to approximately 16.5 million cardholders.

6. As of February 26, 2010, all HSBC consumer and small business credit card agreements for new accounts have not included an arbitration clause or class action waiver provision.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief based upon the information provided to me by the implementing teams for these CITs.

Dated: May 26, 2010



Megan S. Webster
Vice President and Senior Counsel
HSBC