

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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: IN RE : MDL No. 1409
: :
: CURRENCY CONVERSION FEE : M 21-95
: ANTITRUST LITIGATION :
: :
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: THIS DOCUMENT RELATES TO: : Index No. 05 CV 7116 (WHP)
: :
: ROBERT ROSS, et al., :
: :
: Plaintiffs, :
: :
: -against- :
: : Jury Trial Demanded
: BANK OF AMERICA, N.A., et al., :
: :
: Defendants. :
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**DECLARATION OF DAVID A. LANGER
IN SUPPORT OF PLAINTIFFS' MEMORANDUM OF LAW IN SUPPORT OF
CLASS PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT WITH THE NATIONAL ARBITRATION FORUM**

David A. Langer, being duly sworn, deposes and states as follows:

1. I am licensed to practice law in the Commonwealth of Pennsylvania, and I am an associate at the law firm of Berger & Montague, P.C., plaintiffs' counsel in the above-captioned action. I submit this Declaration in support of Plaintiffs' Memorandum of Law in Support of Class Plaintiffs' Motion for Preliminary Approval of Class Action Settlement with the National Arbitration Forum.

2. Attached as Exhibit 1 is a true and correct copy of the Memorandum of Settlement with National Arbitration Forum, Inc., dated May 19, 2010.

3. Attached as Exhibit 2 is a true and correct copy of the Notice Plan regarding the Memorandum of Settlement with National Arbitration Forum, Inc.

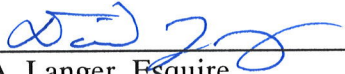
4. Attached as Exhibit 3 is a true and correct copy of the First Amended Class Action Complaint in this matter, dated June 4, 2009.

5. Attached as Exhibit 4 is a true and correct copy of the complaint in *Minnesota v. National Arbitration Forum, Inc.*, No. 27-CV-09-18550, dated July 14, 2009.

6. Attached as Exhibit 5 is a true and correct copy of the Consent Judgment in *Minnesota v. National Arbitration Forum, Inc.*, No. 27-CV-09-1850, dated July 28, 2009.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on November 22, 2011



David A. Langer, Esquire