

Merced Irrigation District v. Barclays Bank PLC Claims Administrator  
c/o KCC Class Action Services  
P.O. Box 404000  
Louisville, KY 40233-4000



**BYC**

MERCED IRRIGATION DISTRICT  
v. BARCLAYS BANK PLC  
United States District Court for the  
Southern District of New York

**Must Be Postmarked by  
October 18, 2018  
or Electronically Submitted Online  
by 11:59 p.m. ET on  
October 18, 2018**

## Proof of Claim and Release

If you, between November 1, 2006 and December 31, 2008, held any physical or financial contract which settled against the Intercontinental Exchange (“ICE”) or Dow Jones published daily index prices for peak or off-peak power at either the Mid-Columbia, Palo Verde, South Path 15 or North Path 15 electricity trading hubs, you may be eligible to receive a payment from the Settlement (as defined in the Notice) reached in Merced Irrigation District, on behalf of itself and all others similarly situated v. Barclays Bank PLC, No. 1:15-cv-04878-VM-GWG (S.D.N.Y.) (the “Action”).

The Notice of Proposed Class Action Settlement (“Notice”) that accompanies this Proof of Claim and Release (“Claim Form”) contains the definitions of the defined terms (which are indicated by initial capital letters) used in this Claim Form. The Notice also sets forth the details of the Settlement and the Plan of Allocation by which the settlement proceeds will be distributed to Authorized Claimants.

**In order to become an Authorized Claimant, you must be a member of the Settlement Class (as defined in the response to Question 6 of the Notice) and you must complete and submit this Claim Form.** An electronic version of the Claim Form is available at [www.WesternHubElectricitySettlement.com](http://www.WesternHubElectricitySettlement.com) which is maintained by the Claims Administrator, KCC Class Action Services. Your Claim Form and supporting documentation must be submitted to the Claims Administrator so that it is postmarked by October 18, 2018 or submitted online by 11:59 Eastern time on October 18, 2018. Submission of this Claim Form does not ensure that you will receive any payment from the Settlement; you will only receive a payment if you are entitled to one under the Plan of Allocation described in the Notice and the Court finally approves the Settlement and Plan of Allocation.

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FOR CLAIMS PROCESSING ONLY	OB <input type="checkbox"/>	CB <input type="checkbox"/>	<input type="radio"/> DOC <input type="radio"/> LC <input type="radio"/> REV	<input type="radio"/> RED <input type="radio"/> A <input type="radio"/> B
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## SECTION A – CLAIMANT INFORMATION

The Claims Administrator will use this information for all communications relevant to this Claim Form. If this information changes, please notify the Claims Administrator in writing. If you are a trustee, executor, administrator, custodian, or other nominee and are completing and signing this Claim Form on behalf of the Claimant, you must attach documentation showing your authority to act on behalf of the Claimant (see Section B.7 of the Claim Form, below).

### Section 1 – Claimant Information

Claimant Name:

Claimant Name (continued):

Street Address:

Address (continued):

City

State

Zip Code

Last 4 Digits of Tax ID (Tax ID is the last 4 digits of the social security number, employer identification number, or taxpayer identification number):

Telephone Number:

 -  - 

Email Address (If you provide an email address, you authorize the Claims Administrator to use it in providing you with information relevant to this claim.):

### Section 2 – Authorized Representative Information

Name of the Person You Would Like the Claims Administrator to Contact Regarding this Claim (if different from the Claimant Name listed above):

Telephone Number:

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Email Address (If you provide an email address, you authorize the Claims Administrator to use it in providing you with information relevant to this claim.):



## SECTION B – GENERAL INFORMATION

1. It is important that you read the Notice that accompanies this Claim Form. The Notice and Plan of Allocation described therein explain, among other things:
  - a. Who is a member of the Settlement Class, and therefore qualifies to file this Claim For
  - b. The proposed Settlement which, if granted final approval by the Court, will resolve this class action lawsuit in its entirety;
  - c. The consideration provided by Defendant to settle this class action lawsuit, which is \$29 million;
  - d. How Settlement Class Members will be affected by the Settlement, including the Releases to which Settlement Class Members will be subject, if the Settlement is granted final approval by the Court; and
  - e. The manner in which the Settlement proceeds will be distributed, if the Court grants final approval of the Settlement and Plan of Allocation.

Defendant Barclays Bank PLC has settled the claims brought in this Action alleging it unlawfully monopolized or attempted to monopolize markets in violation of Section 2 of the Sherman Act, and engaged in acts and practices in violation of California Business & Profession Code Section 17200. Barclays denies that the allegations made against it in the Action have merit.

2. To be eligible to receive a payment from the Settlement, you must submit a completed Claim Form and supporting documentation. To be considered timely, your Claim Form and supporting documentation must be submitted to the Claims Administrator so that it is postmarked by October 18, 2018 or submitted online by 11:59 p.m. Eastern time on October 18, 2018.
  - a. To submit a Claim Form and supporting documentation electronically, visit [www.WesternHubElectricitySettlement.com](http://www.WesternHubElectricitySettlement.com) for instructions.
  - b. To submit a Claim Form and supporting documentation via mail, send your completed Claim Form and supporting documentation to the Claims Administrator addressed as follows:

*Merced Irrigation District v. Barclays Bank PLC* Claims Administrator  
c/o KCC Class Action Services  
P.O. Box 404000, Louisville, KY 40233-4000  
1-866-673-9669
  - c. Supporting documentation submitted by mail may be provided on a flash drive
3. Separate Claim Forms should be submitted for each separate legal entity. Conversely, a single Claim Form should be submitted on behalf of one legal entity, no matter how many separate accounts by which that entity held contracts which settled against the ICE or Dow Jones published daily index prices at either Mid-Columbia, Palo Verde, South Path 15 or North Path 15 during the Product Manipulation Periods set forth below.
4. Submission of a Claim Form does not guarantee that you will receive a payment from the Settlement. Payment from the Settlement proceeds to Authorized Claimants will be governed by the Plan of Allocation described in the Notice, if it is approved by the Court, or by such other plan of allocation as the Court may approve.
5. By submitting a signed Claim Form, you will be swearing to the truth of the statements contained in it and the accuracy of the supporting documentation you provide. The making of a false statement or submission of fraudulent supporting documentation will result in rejection of your claim.



6. Your entitlement to a payment from the Settlement will also be determined based on your completion of the Table below and the supporting documentation you provide.
7. Trustees, executors, administrators, custodians or other nominees who are completing and signing this Claim Form on behalf of a Claimant must also submit:
  - a. A description of the capacity in which they are acting (supporting documentation required); and
  - b. Evidence of their authority to bind the person or entity on whose behalf they are acting. Authority to complete and sign a Claim Form cannot be established by a broker demonstrating that they only have discretionary authority to trade in another's account.
8. If you have any questions concerning this Claim Form, or need additional copies of the Claim Form or the Notice, you should contact the Claims Administrator.

**SECTION C – INSTRUCTIONS FOR COMPLETING THE PROOF OF CLAIM  
TABLE AND FOR PROVIDING SUPPORTING DOCUMENTATION**

1. You must complete the Table below in order to be eligible to share in the Settlement proceeds. You must also provide supporting documentation so that the Claims Administrator can verify your entries. You may provide your supporting documentation in electronic form by following the instructions in Section B.2 above.
2. The supporting documentation you provide must consist of business records sufficient to support each of your volume amount entries in the Table below, including business records showing for each trading day (i) each contractual position held, (ii) the volume of the contract in MWh, (iii) whether it was a financial or physical contract, (iv) whether it obligated you *to pay or to receive* an amount based on the index price, and (v) the name of the counterparty.
3. It is preferred, but not required, that this supporting documentation be provided in an Excel spreadsheet or other generally accepted format such as a comma separated value (CSV) text format. The information should be provided in a clear and self-explanatory manner, such as descriptions for each column or field
4. For each ***Upward*** Product Manipulation Period (identified in the “Product Manipulation Periods” Table below), **INJURED VOLUMES**, as indicated on the Table, are the physical and financial contract volumes in megawatt-hours (MWh’s) with respect to which the Claimant ***paid*** a price set by the ICE or Dow Jones Daily Index Price, respectively, for the relevant hub and product. **BENEFITTED VOLUMES**, as indicated in the Table, are the physical and financial contract volumes with respect to which the Claimant ***received*** a price set by the ICE or Dow Jones Daily Index Price, respectively, for the relevant hub and product.
5. For each ***Downward*** Product Manipulation Period (identified in the “Product Manipulation Periods” Table below), **INJURED VOLUMES**, as indicated in the Table, are the physical and financial contract volumes (in MWh’s) with respect to which the Claimant ***received*** a price set by the ICE or Dow Jones Daily Index Price, respectively, for the relevant hub and product. **BENEFITTED VOLUMES**, as indicated in the Table, are the physical and financial contract volumes with respect to which the Claimant ***paid*** a price set by the ICE or Dow Jones Daily Index Price, respectively for the relevant hub and product.
6. If you held no INJURED VOLUMES or BENEFITTED VOLUMES for a Product Manipulation Period, indicate “0” in the corresponding boxes.

For each Upward and Downward Product Manipulation Period (identified in the “Product Manipulation Periods” Table below) for which you entered a positive INJURED VOLUMES amount, then, in the column designated **ICE BASED BENEFITTED VOLUMES AND DOW JONES BASED BENEFITTED VOLUMES COMPLETE?**, enter “YES” if all of the following is correct with respect to the Product Manipulation Period: (i) Claimant has records necessary to determine whether and the full extent to which Claimant had ICE and Dow Jones BENEFITTED VOLUMES for the Product Manipulation Period, and (ii) the ICE and Dow Jones BENEFITTED VOLUMES entries in the Table for the Product Manipulation Period are true and complete. Otherwise, enter “NO” in this column.



**PROOF OF CLAIM TABLE**  
**PRODUCT MANIPULATION PERIODS**

<b>Western Hub</b>	<b>Manipulation Period</b>	<b>Product</b>	<b>Injured ICE Based Volumes (MWh)</b>	<b>Benefitted ICE Based Volumes (MWh)</b>	<b>Injured Dow Jones Based Volumes (MWh)</b>	<b>Benefitted Dow Jones Based Volumes (MWh)</b>	<b>ICE Based Benefitted Volumes and Dow Jones Based Benefitted Volumes Complete? (Yes or No)</b>
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**UPWARD PRODUCT MANIPULATION PERIODS**

Mid-Columbia	3/1/2007 – 6/30/2007	Off-Peak					
Mid-Columbia	3/1/2007 – 4/30/2007	Peak					
Mid-Columbia	8/1/2008 – 8/31/2008	Peak					
North Path 15	4/1/2007 – 6/30/2007	Peak					
Palo Verde	11/1/2006 – 11/30/2006	Peak					
Palo Verde	1/1/2007 – 2/28/2007	Peak					
Palo Verde	4/1/2007 – 5/31/2007	Peak					
Palo Verde	7/1/2007 – 5/31/2008	Peak					
Palo Verde	12/1/2008 – 12/31/2008	Peak					

**DOWNWARD PRODUCT MANIPULATION PERIODS**

Mid-Columbia	6/1/2008 – 6/30/2008	Off-Peak					
Mid-Columbia	6/1/2007 – 6/30/2007	Peak					
Mid-Columbia	5/1/2008 – 6/30/2008	Peak					
North Path 15	12/1/2006 – 12/31/2006	Off-Peak					
South Path 15	2/1/2007 – 3/31/2007	Peak					
South Path 15	5/1/2007 – 5/31/2007	Peak					



## SECTION D - CERTIFICATION & SIGNATURE

### BY SIGNING AND SUBMITTING THIS CLAIM FORM, CLAIMANT OR CLAIMANT'S REPRESENTATIVE CERTIFIES AS FOLLOWS:

1. I (we) have read the Notice and this Claim Form.
2. Claimant is a member of the Settlement Class (as defined in the Settlement Agreement and described in answer to question 6 on page 5-6 of the Notice) and is not one of the entities or individuals excluded from the Settlement Class (as is also described in the Notice).
3. Claimant has not submitted a Request for Exclusion (as described in answer to question 13 on page 13 of the Notice).
4. Claimant has not submitted any other claim covering the same transactions and knows of no other person having done so on its/their/his/her behalf.
5. Claimant acknowledges that, as of the Effective Date of the Settlement (as defined in the Settlement Agreement and described in answer to question 12 on page 12 of the Notice), it shall be bound to the Release set forth in the Settlement Agreement. Specifically, Claimant as a Releasing Party acknowledges that it will be deemed to have released the Defendant and certain of its related entities and persons (called the "Released Parties") as follows: Upon the Effective Date and in consideration of payment of the Settlement Amount into the Escrow Account, Releasing Parties shall be deemed to and do completely remise, release, acquit, and forever discharge Released Parties from any and all claims, including Unknown Claims (as defined in the Settlement Agreement), demands, actions, suits, injuries, and causes of action, *parens patriae* actions, cross-claims, counter-claims, charges, judgments, obligations, debts, setoffs, rights of recovery, liabilities, or damages of any nature, whenever or however incurred (whether actual, punitive, treble, compensatory, or otherwise), including claims for costs, fees, expenses, penalties, and attorneys' fees, whether class or individual, regardless of whether those claims currently exist, are known, or have matured, that the Releasing Parties, or any of them, ever had, now has, or hereafter can, shall or may have, directly, representatively, derivatively, or in any other capacity against any of the Released Parties, whether in law or equity or otherwise, that was alleged or could have been alleged in the Action based on, arising out of or relating in any way to any conduct, act, or omission alleged in the Action, from the beginning of time until the Execution Date, including, without limitation, any such claim under any federal or state antitrust, anti-manipulation, unfair competition, unfair practices, fraud, racketeering, price discrimination, unjust enrichment, unitary pricing or trade practice law (the "Released Claims"). (Please see Section D of the Settlement Agreement for additional information regarding the Release.) And Claimant acknowledges that it shall forever be enjoined from prosecuting any or all of the Released Claims against any of the Released Parties (as defined in the Settlement Agreement and described in answer to question 12 on page 12 of the Notice).
6. Claimant submits to the jurisdiction of the Court with respect to this Claim Form and for purposes of enforcing the releases set forth in the Settlement Agreement, if approved by the Court.
7. Claimant agrees to furnish such additional information with respect to this Claim Form as the Claims Administrator or the Court may require; and
8. Claimant acknowledges that it will be bound by and subject to the terms of any Final Judgment and Order of Dismissal that may be entered by the Court in this Action.



I (WE) CERTIFY, UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA, THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM AND ALL SUPPORTING DOCUMENTATION PROVIDED IN CONNECTION WITH THIS CLAIM FORM IS TRUE, CORRECT AND COMPLETE.

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Signature of Claimant (if individual)

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Date (mm/dd/yyyy)

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Print Name of Claimant

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Signature of Authorized Representative Completing  
Claim Form (if any)

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Date (mm/dd/yyyy)

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Print Name of Authorized Representative Completing  
Claim Form (if any)

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Capacity of Authorized Representative (if other than  
an individual, e.g. title, trustee, executor, administrator,  
custodian or other nominee)

YOUR CLAIM FORM MUST BE POSTMARKED BY OCTOBER 18, 2018 OR  
SUBMITTED ONLINE BY 11:59 PM EASTERN TIME ON OCTOBER 18, 2018





## SECTION E - CHECKLIST REGARDING CLAIM FORM

1. Fill out Section A – Claimant Identification
2. Read about the Action and Settlement in Section B – General Information, and in the Notice.
3. Complete the Table in Section C and submit the required supporting documentation as described in Section C.1 through C.3.
4. Do not send original documentation or records. These items cannot be returned to you by the Claims Administrator.
5. Keep a copy of your completed Claim Form and any supporting documentation or documentation you submit.
6. Read the Certifications and sign your Claim Form
7. Submit the completed Claim Form and supporting documentation by mail or electronically.

To be considered timely, your Claim Form and supporting documentation must be submitted to the Claims Administrator so that it is postmarked by October 18, 2018 or submitted online by 11:59 p.m. Eastern time on October 18, 2018.

- a. To submit a Claim Form and supporting documentation electronically, visit [www.WesternHubElectricitySettlement.com](http://www.WesternHubElectricitySettlement.com) for instructions.
- b. To submit a Claim Form and supporting documentation via mail, send your completed Claim Form and supporting documentation to the Claims Administrator addressed as follows:

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c/o KCC Class Action Services  
P.O. Box 404000  
Louisville, KY 40233-4000  
1-866-673-9669

- c. Supporting documentation submitted by mail may be provided on a flash drive
8. If your address changes in the future, or if the Claim Form was sent to an old or incorrect address, please contact the Claims Administrator using the contact information provided above.

If you have any questions or concerns regarding your claim, please contact the Claims Administrator using the contact information provided above.

