

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE JPMORGAN PRECIOUS METALS  
SPOOFING LITIGATION

Case No.: 1:18-cv-10356 (GHW)

**SUMMARY NOTICE OF PROPOSED CLASS ACTION SETTLEMENT**

**If you purchased or sold any Precious Metals Futures or Options on Precious Metals Futures on the Commodity Exchange Inc. (“COMEX”) or the New York Mercantile Exchange (“NYMEX”) from March 1, 2008 through August 31, 2016, your rights may be affected by a pending class action settlement, and you may be entitled to a portion of the settlement fund.**

This Summary Notice is to alert you to a proposed Settlement totaling **\$60,000,000** (the “Settlement Amount”) reached with JPMorgan Chase & Co. (“JPMorgan”) in a pending class action (the “Action”).

The United States District Court for the Southern District of New York (the “Court”) authorized this Summary Notice and has appointed the lawyers listed below to represent the Settlement Class in this Action:

Vincent Briganti  
LOWEY DANNENBERG, P.C.  
44 South Broadway, Suite 1100  
White Plains, NY 10601  
Telephone: (914) 733-7221  
Email: vbriganti@lowey.com

**Who is a member of the Settlement Class?**

The proposed Settlement Class consists of all Persons and entities that purchased or sold any Precious Metals Futures or Options on Precious Metals Futures on the COMEX or NYMEX from March 1, 2008 through August 31, 2016 (the “Class Period”). Excluded from the Settlement Class are: (i) JPMorgan and any parent, subsidiary, affiliate or agent of JPMorgan, provided, that any Investment Vehicle shall not be excluded from the Settlement Class, but under no circumstances may JPMorgan (or any of its direct or indirect parents, subsidiaries, affiliates, or divisions) receive a distribution for its own account from the Settlement Fund through an Investment Vehicle; and (ii) the United States Government.

“Precious Metals Futures” means Gold Futures contract(s), Silver Futures contract(s), Platinum Futures contract(s) or Palladium Futures contract(s), and “Options on Precious Metals Futures” means any option on Precious Metals Futures.

The other capitalized terms used in this Summary Notice are defined in the detailed Notice of Proposed Class Action Settlement, **July 7, 2022** Fairness Hearing Thereon and Class Members' Rights ("Notice") and in the Settlement Agreement, which are available at [www.preciousmetalsfuturesclassactionsettlement.com](http://www.preciousmetalsfuturesclassactionsettlement.com).

If you are not sure if you are included in the Settlement Class, you can get more information, including the detailed Notice, at [www.preciousmetalsfuturesclassactionsettlement.com](http://www.preciousmetalsfuturesclassactionsettlement.com) or by calling toll-free 1-877-999-4333 (if calling from outside the United States or Canada, call 1-414-921-0344).

### **What is this lawsuit about and what does the Settlement provide?**

Class Plaintiffs allege that Defendants JPMorgan and three of JPMorgan's former futures traders (John Edmonds, Robert Gottlieb, and Michael Thomas Nowak) unlawfully and intentionally manipulated the prices of gold and silver futures and options contracts traded on the COMEX and platinum and palladium futures and options traded on the NYMEX during the Class Period in violation of the Commodity Exchange Act, 7 U.S.C. §§ 1, *et seq.* and the common law.

JPMorgan maintains that it has good and meritorious defenses to Class Plaintiffs' claims and would prevail if the case were to proceed. Nevertheless, to settle the claims in this lawsuit, and thereby avoid the expense and uncertainty of further litigation, JPMorgan has agreed to pay a total of \$60,000,000 in cash for the benefit of the proposed Settlement Class. If the Settlement is approved, the Settlement Amount, plus interest earned from the date it was established (the "Settlement Fund"), less any Taxes, the reasonable costs of Class Notice and administration, any Court-awarded attorneys' fees, litigation expenses and costs, Incentive Awards for Class Plaintiffs, and any other costs or fees approved by the Court (the "Net Settlement Fund") will be divided among all Class Members who file valid Proof of Claim and Release Forms ("Claim Form").

If the Settlement is approved, the Action will be resolved against all Defendants. If the Settlement is not approved, JPMorgan and the other Defendants will remain as defendants in the Action, and Class Plaintiffs will continue to pursue their claims against Defendants.

### **Will I get a payment?**

If you are a member of the Settlement Class and do not opt out, you will be eligible for a payment under the Settlement if you file a Claim Form. You may obtain more information at [www.preciousmetalsfuturesclassactionsettlement.com](http://www.preciousmetalsfuturesclassactionsettlement.com) or by calling toll-free 1-877-999-4333 (if calling from outside the United States or Canada, call 1-414-921-0344).

Claim Forms must be postmarked by **August 8, 2022** or submitted online at [www.preciousmetalsfuturesclassactionsettlement.com](http://www.preciousmetalsfuturesclassactionsettlement.com) on or before 11:59 p.m. Eastern time on **August 8, 2022**.

### **What are my rights?**

If you are a member of the Settlement Class and do not opt out, you will release certain legal rights against JPMorgan, the other Defendants, and Released Parties as explained in the detailed Notice and Settlement Agreement, which are available at [www.preciousmetalsfuturesclassactionsettlement.com](http://www.preciousmetalsfuturesclassactionsettlement.com). If you do not want to take part in the proposed Settlement, you must opt out by **May 23, 2022**. You may object to the proposed Settlement, the Distribution Plan, and/or Lead Counsel's request for attorneys' fees, payment of litigation costs and expenses, and any Incentive Awards to Class Plaintiffs. If you want to object, you must do so by **May 23, 2022**. Information on how to opt out or object is contained in the detailed Notice, which is available at [www.preciousmetalsfuturesclassactionsettlement.com](http://www.preciousmetalsfuturesclassactionsettlement.com).

### **When is the Fairness Hearing?**

The Court will hold a hearing via audio teleconference from the United States District Court for the Southern District of New York, at the Daniel Patrick Moynihan U.S. Courthouse, located at 500 Pearl Street, New York, NY 10007, on **July 7, 2022 at 3:00 p.m.** Eastern Time to consider whether to finally approve the proposed Settlement, Distribution Plan, the application for an award of attorneys' fees and payment of litigation costs and expenses, and the application for Incentive Awards for the Class Plaintiffs. Any Class Member who wants to participate at the Fairness Hearing can do so remotely by calling the following toll-free number: 1-888-567-1602 (if calling from outside the United States or Canada, call 1-862-298-0702) on the date and time of the Fairness Hearing. You or your lawyer may ask to participate and speak at the hearing, but you do not have to. Any changes to the time and place of the Fairness Hearing, or other deadlines, will be posted to [www.preciousmetalsfuturesclassactionsettlement.com](http://www.preciousmetalsfuturesclassactionsettlement.com) as soon as is practicable.

**For more information, call toll-free 1-877-999-4333 (if calling from outside the United States or Canada, call 1-414-921-0344) or visit [www.preciousmetalsfuturesclassactionsettlement.com](http://www.preciousmetalsfuturesclassactionsettlement.com).**

***\*\*\*\* Please do not call the Court or the Clerk of the Court for information about the Settlement. \*\*\*\****