

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE MOL GLOBAL, INC. SECURITIES
LITIGATION

No. 14-Civ-9357 (WHP)

ECF Case

**DECLARATION OF IRA M. PRESS
IN SUPPORT OF LEAD PLAINTIFF'S MOTION
TO AUTHORIZE DISTRIBUTION OF NET SETTLEMENT FUND**

IRA M. PRESS declares as follows, pursuant to 28 U.S.C. § 1746:

1. I am a member of the law firm of Kirby McInerney LLP, counsel for Court-appointed Lead Plaintiff Lembaga Tabung Amanah Pekerja (the "TAP Retirement Fund") and Court-appointed Lead Counsel¹ in the above-titled action (the "Action").

2. I was actively involved in the prosecution of this case, am familiar with its proceedings, and have personal knowledge of the matters set forth herein based upon my close supervision and active participation in all material aspects of the Action since my firm's appointment.

3. I respectfully submit this declaration in support of Lead Plaintiff's motion for an Order, pursuant to Rule 23 of the Federal Rules of Civil Procedure, authorizing, *inter alia*: (i) distribution of the Net Settlement Fund established by the settlement of this Action to Authorized Claimants; (ii) the Claims Administrator to deem timely otherwise eligible claims that were submitted after the October 4, 2016 claims filing deadline, but received no later than February 9, 2017; (iii) distribution of the Net Settlement Fund, after deduction of the payment requested herein, to Class Members whose Proofs of Claim have been accepted; (iv) the Claims

¹ Unless otherwise indicated, all capitalized terms herein have the same meaning as is ascribed in the Stipulation of Settlement (the "Stipulation") filed with the Court on April 12, 2016 [ECF No. 102-1].

Administrator to reallocate to Authorized Claimants (including late claimants approved by the Court) any residual funds remaining in the Net Settlement Fund (whether by reason of tax refunds, uncashed checks, or otherwise) six (6) months after the initial distribution in the same manner consistent with the Plan of Allocation, and thereafter to permit Lead Counsel to donate, subject to Court approval, any remaining balance to a non-sectarian, not-for-profit, 501(c)(3) organization serving the public interest; (v) the destruction of claim forms and records in paper form one year after final distribution of the Net Settlement Fund, and claim forms and records in electronic form three years after final distribution of the Net Settlement Fund; and (vi) finally and forever barring further claims against the Settlement Fund.

4. Defendants caused the gross Settlement Amount to be wire-transferred to an escrow account maintained by Lead Counsel at Citibank, N.A. Consistent with the Stipulation, Lead Counsel caused the funds to be invested in United States Treasuries. The balance of the Settlement fund as of February 10, 2017 is \$6,779,612.43. The balance of the Settlement fund continues to accrue daily interest.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 13, 2017 in New York, New York.

/s/ Ira M. Press
Ira M. Press