

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: COMMERCIAL DIVISION**

EMPLOYEES RETIREMENT SYSTEM FOR THE  
CITY OF PROVIDENCE, derivatively as a  
shareholder of CREDIT SUISSE GROUP AG on  
behalf of CREDIT SUISSE GROUP AG,

Plaintiff

v.

URS ROHNER, *et al.*,

Defendants,

and

CREDIT SUISSE GROUP AG,

Nominal Defendant.

Index No. 651657/2022

Hon. Andrea Masley

Part 48

Mot. Seq. Nos. 26 & 27

**AFFIRMATION OF ERIC J. RIEDEL IN SUPPORT OF PLAINTIFF'S REPLY  
MEMORANDUM OF LAW IN FURTHER SUPPORT OF (I) PLAINTIFF'S  
MOTION FOR FINAL APPROVAL OF SETTLEMENT AND (II) PLAINTIFF'S  
COUNSEL'S MOTION FOR ATTORNEYS' FEES, LITIGATION EXPENSES,  
AND SERVICE AWARD**

I, Eric J. Riedel, affirm, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

1. I am a senior counsel at Bernstein Litowitz Berger & Grossmann LLP (“BLB&G” or “Plaintiff’s Counsel”), and counsel for Plaintiff Employees Retirement System for the City of Providence (the “City of Providence” or “Plaintiff”).<sup>1</sup> I have personal knowledge of the matters set forth in this affirmation based on my active supervision of, and participation in the prosecution and settlement of the above captioned action.

2. I submit this affirmation in support of Plaintiff’s Reply Memorandum of Law in Further Support of (1) Plaintiff’s Motion for Final Approval of Settlement and (2) Plaintiff’s Counsel’s Motion for Attorneys’ Fees, Litigation Expenses, and Service Award.

3. On September 26, 2025, Bottini & Bottini, Inc. (“Bottini”), counsel for Ezra Cattani, filed a brief objecting to the Settlement and Fee Application. NYSCEF #981. Bottini did not contact Plaintiff’s Counsel prior to filing this objection to discuss the concerns raised in the brief or supporting affirmations.

4. On October 7, 2025, I emailed Bottini to explain why the Settlement did not release the dismissed (*i.e.*, non-overlapping) allegations and claims in *Cattani v. Rohner*, Index No. 652468/2020 (Sup. Ct. N.Y. Cnty.) (the “*Cattani* Action”) nor the direct claims asserted in *Lawtome-Bowles v. Thornburgh*, Case No. 23 Civ. 4813 CM (SLC) (S.D.N.Y.) or *Stevenson v. Thornburgh*, Case No. 23 Civ. 4458 CM (SLC) (S.D.N.Y.) (together, the “*Stevenson* Action”). I also informed Bottini that the parties to this Action were willing to add language to the proposed

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<sup>1</sup> Unless otherwise stated or defined in this Affirmation, all capitalized terms used herein shall have the meanings provided in the Stipulation and Agreement of Settlement, Compromise, and Release dated August 21, 2025 (the “Stipulation of Settlement”). NYSCEF #952.

judgment to that effect. A true and correct copy of this correspondence, including follow-up emails, is attached hereto as **Exhibit 1**.

5. On October 9, 2025, Albert Chang from Bottini called in response to my email. He stated that he believed that the proposed language to be added to the proposed judgment was “good progress” and agreed that it would make clear that his claims in the *Cattan* and *Stevenson* Actions were not impacted by the Release. Mr. Chang stated that he did not intend to withdraw the objection because Bottini still intended to seek leave to apply for a fee. Mr. Chang also asked to see the final proposed judgment language once the parties had reached an agreement.

6. Following this call, Plaintiff’s Counsel and counsel for UBS and Defendants confirmed their agreement on the language to be added to the proposed judgment, and I emailed Mr. Chang to inform him of that agreement. Bottini has not responded.

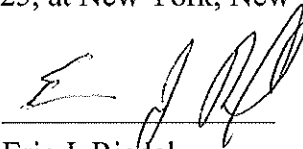
7. Other than the objections filed by Bottini, Plaintiff has received no other objections to the Settlement or complaints about the Notice.

8. Bottini’s work in connection with the *Cattan* Action did not advance or contribute to the drafting of Plaintiff’s complaint in this Action. Credit Suisse’s losses from Archegos and Greensill were widely reported in the news, including in connection with the publication of Paul Weiss’s report on the Archegos losses. It was this reporting and Plaintiff’s Counsel’s subsequent investigation, not the *Cattan* Action, that led to the commencement of this Action.

9. Bottini did not assist Plaintiff or Plaintiff’s Counsel with the litigation or settlement of this Action.

10. A true and correct copy of the settlement notice in *In re Alphabet Inc. Shareholder Derivative Litigation*, Case No. 19-CV-341522 (Sup. Ct., Cal.), dated October 26, 2022, obtained from the website of Bottini & Bottini, Inc.,<sup>2</sup> is attached hereto as **Exhibit 2**.
11. A true and correct copy of the settlement notice in *Ontario Provincial Council of Carpenters' Pension Trust Fund v. S. Robson Walton*, C.A. No. 2021-0827-JTL (Del. Ch. Oct. 13, 2024), obtained from File&Serve Delaware, is attached hereto as **Exhibit 3**.
12. A true and correct copy of the settlement notice in *Employees Retirement System of the City of St. Louis v. Jones*, Case No. 2:20-cv-04813-ALM-KAJ (S.D. Ohio Jul. 28, 2022), Docket #186-1 Exhibit D, obtained from Public Access to Court Electronic Records (*i.e.*, Pacer), is attached hereto as **Exhibit 4**.

Executed this 10th day of October 2025, at New York, New York.

  
Eric J. Riedel

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<sup>2</sup> Available at <https://www.bottinilaw.com/sites/default/files/%2810.26.22%29%20Final%20Alphabet%20Exhibit%20C%20%28Summary%20Notice%29.pdf>.