

## EMAIL NOTICE OF PENDENCY AND PROPOSED SETTLEMENT OF CLASS ACTION

### **IF YOU INVESTED IN ROSE CITY INCOME FUND I, ROSE CITY INCOME FUND II, SENECA VENTURES AND/OR THEIR AFFILIATES, YOU MAY BE ENTITLED TO A PAYMENT FROM A CLASS ACTION SETTLEMENT.<sup>1</sup>**

**A Federal Court authorized this Notice. This is not a solicitation from a lawyer.**

YOU ARE HEREBY NOTIFIED that, pursuant to an Order of the United States District Court for the District of Oregon, a hearing will be held on December 3, 2025 at 2:30 p.m., before the Honorable Michael H. Simon in Courtroom 15B of the United States District Court for the District of Oregon, Mark O. Hatfield U.S. Courthouse, 1000 SW Third Ave., Portland, OR 97204 ("Final Fairness Hearing"), to determine whether a proposed settlement of claims asserted in *Amit Fatnani, et al. v. JPMorgan Chase & Co., et al.*, No. 3:23-cv-00712 (the "Action") against Columbia Banking Systems, Inc. as Successor to Umpqua Holdings Corporation ("Umpqua"); KeyBank National Association ("KeyBank"); JPMorgan Chase Bank, N.A. ("Chase"), and Intertrust Corporate and Fund Services LLC ("Intertrust," and collectively with Umpqua, KeyBank, and Chase, "Settling Defendants"), for the total sum of (\$3,750,000.00) in cash ("Settlement") should be approved by the Court as fair, reasonable, and adequate. The terms of the proposed settlement are set forth in the parties' written settlement agreement dated July 24, 2025, ("Settlement Agreement"), which is available for review at [www.FatnaniRoseCitySettlements.com](http://www.FatnaniRoseCitySettlements.com). As reflected in that Settlement Agreement, Umpqua, Chase, and KeyBank have agreed to pay \$1,000,000.00, each, to resolve the claims asserted against them, and Intertrust has agreed to pay \$750,000.00.

At the Final Fairness Hearing the Court will also determine whether Settlement Class Counsel's application for attorneys' fees and expenses (not to exceed 33.33% of the gross settlement amount), as well as potential service awards to be awarded to the two Settlement Class Representatives (not to exceed \$5,000 each), should be approved.

If the Settlement is approved, all net settlement proceeds (*i.e.*, all funds remaining after deduction of Court-approved expenses, attorneys' fees, and service awards) will be paid to the Rose City Receivership Estate that has been established for the benefit of investors in Rose City Income Fund I, Rose City Income Fund II, Seneca Ventures, LLC and/or any of their affiliates under the supervision of a federal district court in the Northern District of Illinois, No. 1:22-cv-02465, and thereafter ultimately distributed to Settlement Class Members pursuant to the plan of allocation approved by that court. All claims asserted in this Action against the Settling Defendants would be dismissed with prejudice, meaning that Settlement Class Members will lose the right to participate in any other lawsuit against the Settling Defendants (and parties related to them) concerning the legal claims being resolved by and through the Settlement.

You are a Settlement Class member if you are an individual or entity that invested in the Alleged Ponzi Scheme and/or contributed funds to the Alleged Ponzi Scheme Individuals/Entities,<sup>2</sup> and as such, your rights may be affected by this Action and this Settlement. A detailed Notice of (I) Pendency of Class Action and Proposed Settlement; (II) Final Approval Hearing; and (III) Motion for Attorneys' Fees and Litigation Expenses ("Notice") is available for download at [www.FatnaniRoseCitySettlements.com](http://www.FatnaniRoseCitySettlements.com) or by writing to the Settlement Administrator, Stretto, at

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<sup>1</sup> This Notice incorporates by reference the definitions in the Settlement Agreements for each of the Settlements, and all capitalized terms used, but not defined herein, shall have the same meanings as in the Settlement Agreements. The Settlement Agreements can be obtained at [www.FatnaniRoseCitySettlements.com](http://www.FatnaniRoseCitySettlements.com).

<sup>2</sup> The "Alleged Ponzi Scheme" means the alleged fraudulent scheme referenced in Plaintiffs' Fourth Amended Complaint, available at [www.FatnaniRoseCitySettlements.com](http://www.FatnaniRoseCitySettlements.com). The Alleged Ponzi Scheme Individuals/Entities are defined in the Settlement Agreement to include Sam Ikkurty a/k/a Sreenivas I Rao; Ravishankar Avadhanam; Jafia, LLC; Ikkurty Capital LLC; Rose City Income Fund I, LP; Rose City Income Fund II, LP; MySivana, LLC; Merosa, LLC; Seneca Ventures, LLC; and any other individuals or entities that played a similar role in the Alleged Ponzi Scheme.

**Fatnani Rose City Settlements**  
c/o Stretto  
410 Exchange, Suite 100  
Irvine, CA 92602

You will be bound by any judgment rendered in the Action concerning the Settlement and/or the Settling Defendants unless you request to be excluded from the proposed Settlement Class. If you wish to exclude yourself from the Settlement Class, you must submit a request for exclusion postmarked no later than October 31, 2025, in accordance with the instructions set forth in the Notice. If you ask to be excluded, you will not get any payment from the Settlement, and you cannot object to the Settlement. You will not be legally bound by anything that happens in the lawsuit, and you may be able to sue the Settling Defendants in the future concerning the claims asserted in the Action. If you want to bring your own lawsuit based on the matters alleged in this Action, you should consult an attorney and discuss potential claims that may or may not be available to you.

Any objection to any aspect of the Settlement or any of the matters to be addressed at the Final Fairness Hearing must be filed with the Clerk of the Court for the District of Oregon and also delivered to Settlement Class Counsel and the Settling Defendants' Counsel no later than October 31, 2025, in accordance with the instructions set forth in the Notice.

Inquiries, other than requests for the Notice, may be made to Settlement Class Counsel:

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***PLEASE DO NOT TELEPHONE THE COURT REGARDING THIS NOTICE***

DATED: August 13, 2025

BY ORDER OF THE COURT  
UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON