

**BEFORE THE UNITED STATES
JUDICIAL PANEL ON MULTIDISTRICT LITIGATION**

IN RE: Paycheck Protection Program (“PPP”) Agent Fees Litigation

MDL Docket No. 2950

PROOF OF SERVICE

Pursuant to Rule 4.1(a) of the Rules of Procedure for the United States Judicial Panel on Multidistrict Litigation, I, Rafey Balabanian, who represents Howard Smukler in a proceeding in the U.S. District Court for the Northern District of California styled *Smukler v. JPMorgan Chase Bank, N.A.*, et al., 3:20-cv-03413-JD, hereby certifies that on June 17, 2020, a true and correct copy of the Interested Party Motion for Extension of Time to Respond to which this is attached was filed through the Panel’s CM/ECF system, and consequently served upon all parties through their counsel of record.

Dated: June 17, 2020

By: /s/ Rafey Balabanian
One of the Interested Party’s Attorneys

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