

**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 18, 2020, a true and correct copy of the Notice of Appearance 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 18, 2020

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

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