Exhibit 4

PLAN OF DISTRIBUTION
LENDER U.S. DOLLAR LIBOR SETTLEMENT

Credit Suisse Group AG ("Credit Suisse"); MUFG Bank, Ltd. f/k/a The Bank of Tokyo-Mitsubishi UFJ, Ltd. ("MUFG")

1. **Settlement Funds.** The Settlement Fund for the Settlement with Credit Suisse Group AG ("Credit Suisse") is $380,000. The Settlement Fund for the Settlement with MUFG Bank, Ltd. f/k/a The Bank of Tokyo-Mitsubishi UFJ, Ltd. ("MUFG") is $380,000. The Settlement Agreements, and additional materials describing these Settlements, can be found at www.LendersLiborSettlements.com. All capitalized terms herein are used as defined in the Settlement Agreements.

2. **Net Settlement Fund.** The Net Settlement Fund, as defined in the Settlement Agreements, shall be distributed to members of the Class who timely submit valid Proofs of Claim ("Authorized Claimants") as described below.

3. **Qualifying LIBOR Loans.** For purposes of this Plan of Distribution, a "Qualifying LIBOR Loan" is a U.S. Dollar LIBOR-Based Loan that qualifies its originator, holder, purchaser, or seller to be a member of the Settlement Class, and for which a valid Proof of Claim has been timely filed. A "U.S. Dollar LIBOR-Based Loan" is a loan with any term, provision, obligation or right to pay, to be paid, or to receive interest based upon any U.S. Dollar LIBOR rate, including but not limited to business or home loans. For the avoidance of doubt, U.S. Dollar LIBOR-Based Loan does not include the instruments covered by the proposed class in the OTC Action, which include asset swaps, collateralized debt obligations, credit default swaps, forward rate agreements, inflation swaps, interest rate swaps, total return swaps, options and floating rate notes entered directly with a defendant in the OTC Action. The Settlement Class includes, subject to certain

exceptions set forth in the Settlement Agreement, all lending institutions headquartered in the United States, including its fifty (50) states and United States territories, that originated loans, held loans, held interests in loans, owned loans, owned interests in loans, purchased loans, purchased interests in loans, sold loans, or sold interests in loans with interest rates based upon U.S. Dollar LIBOR-Based Loans, which rates adjusted at any time between August 1, 2007 and May 31, 2010 (the "Class Period").

4. **Proof of Claim.** A Lender Class Member must timely submit a valid Proof of Claim that is accepted in whole or in part by the Claims Administrator in order to obtain recovery from the Net Settlement Fund.

5. ***Pro Rata* Claim.** The Claims Administrator will determine the *Pro Rata* Claim of each Authorized Claimant by calculating each Authorized Claimant's *pro rata* share of the Net Settlement Fund. This will be calculated in the following method:

a. First, each Authorized Claimant's "suppressed daily underpayments" are calculated. The suppressed daily underpayments for a loan are calculated as follows:

> For each day during the class period when the Claimant had the right to be paid or to receive interest based upon the U.S. Dollar LIBOR rate that adjusted during the class period, the suppressed daily underpayment equals: (i) the outstanding nominal dollar amount of the U.S. Dollar LIBOR-Based Loan, (ii) multiplied by the Suppression Rate corresponding to the U.S. Dollar LIBOR-Based Loan's relevant U.S. Dollar LIBOR rate (*e.g.*, 1-month LIBOR, 3-month LIBOR) on the relevant fixing/reset date and then (iii) divided by the number of interest payments per year

on that U.S. Dollar LIBOR-Based Loan.[1] The Suppression Rate on a particular date is the difference between: (a) the relevant U.S. Dollar LIBOR rate that Lender Plaintiffs allege would have been reported absent Defendants' suppression (called the "But-For LIBOR Rate") and (b) the relevant published U.S. Dollar LIBOR rate (the "Published LIBOR Rate").[2]

For example, assume Authorized Claimant X had a Qualifying LIBOR Loan expressly tied to the 3-month U.S. Dollar LIBOR that paid interest quarterly, including a payment with a LIBOR interest reset date during the Class Period on which the outstanding nominal amount of the loan was $1 million. On that hypothetical date, the Suppression rate was 10 bps. Authorized Claimant X's suppressed daily underpayment for this payment would be $250, as follows: ($1,000,000 x 0.1%)/ 4 = $250.

b. Second, each Authorized Claimant's "adjusted total notional stake" is calculated. The notional stake of a Qualifying LIBOR Loan equals the sum of the "suppressed daily underpayments" for that loan. An Authorized Claimant's "total notional stake" equals the sum of the notional stakes for each of its Qualifying LIBOR Loans. An Authorized Claimant's adjusted total notional stake equals the Authorized Claimant's total notional stake discounted for any Legal Risk Adjustment applicable to the Authorized Claimant (*see* ¶ 6 below).

[1] If necessary, the applicable payment dates for a U.S. Dollar LIBOR-Based Loan will be estimated by adding multiples of the LIBOR tenor to the date on which the loan was extended (or acquired) until the expiry date of the loan. If necessary, the outstanding notional on each payment date will be computed using a linear interpolation between the nominal on the day the loan was extended / acquired to the outstanding nominal on the maturity / sale date.

[2] The magnitude of suppressions for a day is based on the weekly average of suppression for that tenor, as reported in the expert modeling offered on behalf of the Lender Plaintiffs, and as adjusted to reflect tenors and periods not reported on in that report. Prior to the date when the Proof of Claim is due, a chart depicting the weekly averages of suppression for each tenor will be posted on the website.

c. Third, each Authorized Claimants "*pro rata* share" is calculated. This is calculated by dividing each Authorized Claimant's adjusted total notional stake by the sum of the adjusted total notional stakes of all Authorized Claimants. For example, if an Authorized Claimant has an adjusted total notional stake of $20,000, and the total adjusted total notional stake of all claimants combined is $100 million, then that Authorized Claimant's *pro rata* share will be .0002.

d. Fourth, the *Pro Rata* Claim for each Authorized Claimant is calculated by multiplying the amount in the Net Settlement Fund by that Authorized Claimant's *pro rata* share.

6. **Legal Risk Adjustment.** In calculating the adjusted total notional stake of an Authorized Claimant, the Settlement Administrator shall make an adjustment to the total notional stake for Authorized Claimants residing / domiciled in certain states / territories based on additional legal risks that exist for fraud claims asserted under the laws of those states / territories. There shall be a 50% legal risk discount applied to the total notional stake of Authorized Claimants residing / domiciled in the following states / territories: Alabama, Alaska, Arizona, Arkansas, Colorado, Delaware, District of Columbia, Idaho, Kansas, Louisiana, Maryland, Massachusetts, Mississippi, Montana, Nevada, New Hampshire, North Carolina, Oklahoma, Oregon Pennsylvania, Puerto Rico, South Carolina, Tennessee, Texas, Utah, Virginia, Washington, and West Virginia.

7. **Distribution.** Upon approval of the Court, the Claims Administrator shall distribute the *Pro Rata* Claim Amounts to Claimants from the Net Settlement Fund. In the opinion of Interim Lead Class Counsel, this method of distributing funds represents the most appropriate way of distributing the Net Settlement Fund under the circumstances of this case. The Claims Administrator shall have the discretion to resolve any disputes regarding the meaning and application of this Plan of Distribution, and subject to review by the Court as appropriate.

8. **De Minimis Amount.** In order to avoid paying claims in situations where the cost of processing the claim would exceed the payment made, no claim will be paid to any claimant if the total payment to that claimant would be $10.00 or less; in such an event, the payment amount will revert back to the Net Settlement Fund.

9. **Rounding**. The distribution to each Authorized Claimant from the Net Settlement Fund will be rounded off to the nearest dollar.

10. **Modifications To This Plan of Distribution.** This Plan of Distribution may be modified by further order of the Court. Any updates to this Plan of Distribution will be published on the website www.LendersLiborSettlements.com, Claimants should check the website for updates to this Distribution Plan regularly, including on the day of the final deadline for the filing of Proofs of Claim.