

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE MEXICAN GOVERNMENT BONDS
ANTITRUST LITIGATION

Master Docket No. 18-cv-02830

THIS DOCUMENT RELATES TO:

ALL ACTIONS

**DECLARATION OF JASON RABE REGARDING MAILING OF CLASS NOTICE
AND PROOF OF CLAIM AND RELEASE FORM TO POTENTIAL CLAIMANTS
IDENTIFIED IN FOREIGN COUNTERPARTY INFORMATION**

I, Jason Rabe, declare and state as follows:

1. I am a Program Manager at Rust Consulting, Inc. (“Rust”). My business address is 625 Marquette Avenue, Suite 900, Minneapolis, Minnesota 55402. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. Rust was retained by Shearman & Sterling LLP on behalf of non-party subpoena recipients Bank of America, N.A. (“BANA”) and Merrill Lynch, Pierce, Fenner & Smith Incorporated (“MLPFS”), Cleary Gottlieb Steen & Hamilton LLP on behalf of Citigroup Global Markets Inc. (“CGMI”), Skadden, Arps, Slate, Meagher & Fiom LLP on behalf of HSBC Securities (USA) Inc. (“HSBC”), Davis Polk & Wardwell LLP on behalf of BBVA Securities Inc. (“BSI”) and WilmerHale on behalf of Santander Investment Securities Inc. (“Santander”) (collectively referred to as the “Non-Party Subpoena Recipients”) to assist in the process of providing notice to certain potential members of the Settlement Class in the above-captioned class action litigation (the “Action”).

3. Acting as an agent for the Non-Party Subpoena Recipients, Rust is responsible for the distribution of notice and claim forms to certain potential members of the Settlement Class for purposes of ensuring compliance with applicable privacy laws and regulations to

which this information may be subject. I have the responsibility for overseeing all aspects of notice administration services performed by Rust on behalf of the Non-Party Subpoena Recipients with respect to the Action.

4. I submit this declaration to provide the Court and the parties in this Action with information regarding the mailing of the Notice of Proposed Class Action Settlements, September 13, 2021 Fairness Hearing Thereon¹ and Class Members' Rights (the "Notice") and the Proof of Claim and Release (the "Claim Form") (together, the "Notice Packet").

MAILING OF CLASS NOTICE

5. On July 26, 2021, the Notice Packet was provided to Rust for the mailing. A copy of the Notice Packet is attached hereto as Exhibit A. On July 28, 2021, Rust received an updated version of the Notice Packet, advising of the adjourned deadlines.

6. Rust received 15 electronic files on behalf of the Non-Party Subpoena Recipients, containing the names and addresses, where available, of collectively 89,632 foreign counterparties who engaged in relevant Mexican Government Bond Transactions. Rust entered the data into segregated databases to be used for the mailing. The data was scrubbed to eliminate duplicate names and addresses and incomplete records. As a result of the processes above, 86,396 duplicate or incomplete records were removed, resulting in 3,236 records for mailing.

7. Rust mailed 638 Notice Packets on September 9, 2021 and 2,598 Notice Packets on September 10, 2021. Through September 10, 2021, a total of 3,236 Notice Packets had been mailed.

8. Rust leases and maintains a Post Office Box (P.O. Box 44, Minneapolis, MN 55440-0044) for the receipt of all undeliverable mail and any written communications received.

¹ I have been advised that the Fairness Hearing has been adjourned to October 28, 2021.

I declare under the penalty of perjury that the foregoing statements are true and correct to the best of my knowledge.

Executed on this 21st day of September 2021 in Minneapolis, Minnesota.



Jason Rabe