

**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 STEVEN STRAUB ON BEHALF OF A.B. DATA, LTD.  
REGARDING NOTICE AND CLAIMS ADMINISTRATION FOR CLASS ACTION  
SETTLEMENTS WITH BARCLAYS CAPITAL INC. AND JPMORGAN**

Pursuant to 28 U.S.C. §1746, I, Steven Straub, declare:

1) I am the Senior Project Manager of Client Services of A.B. Data, Ltd.’s Class Action Administration Division (“A.B. Data”). I am over 21 years of age and am not a party to the above-captioned action. My business address is 600 A.B. Data Drive, Milwaukee, WI 53217, and my telephone number is 414-961-7551. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2) I submit this Declaration in order to provide the Court in the above-captioned class action litigation (the “Action”) with information regarding the mailing of the Notice of Proposed Class Action Settlements, September 13, 2021 Fairness Hearing Thereon<sup>1</sup> and Class Members’ Rights (the “Mailed Notice”) and Proof of Claim and Release Form (the “Claim Form” and collectively with the Mailed Notice, the “Notice Packet”), publication of the Summary Notice of Proposed Class Action Settlements (the “Media Notice”), establishment and maintenance of a website, and other administrative activities for the settlements with Barclays PLC, Barclays Bank

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<sup>1</sup> On July 26, 2021, the Court entered an Order adjourning the date of the Fairness Hearing. *See* ECF No. 239.

PLC, Barclays Capital Inc., Barclays Capital Securities Limited, Barclays Bank México, S.A., Institución de Banca Múltiple, Grupo Financiero Barclays México, and Grupo Financiero Barclays México, S.A. de C.V. (collectively “Barclays”) and JPMorgan Chase & Co., J.P. Morgan Broker-Dealer Holdings Inc., J.P. Morgan Securities LLC, JPMorgan Chase Bank, National Association, Banco J.P. Morgan, S.A. Institución de Banca Múltiple, J.P. Morgan Grupo Financiero, and J.P. Morgan Securities plc (collectively “JPMorgan”).

**DIRECT MAIL NOTICE**

3) On or about January 31, 2021, A.B. Data received from Plaintiffs’ Lead Counsel files containing both the names and addresses of the largest traders in Mexican Government Bonds,<sup>2</sup> comprised of the most recent list of the top 75 holders of Mexican Government Bonds. A.B. Data electronically processed the data received to ensure adequate address formatting and eliminate duplicate names and addresses. The names and addresses were then loaded to a segregated database created for this Action (the “Notice Mailing Database”).

4) On February 8, 2021, Plaintiffs’ Lead Counsel forwarded A.B. Data an Excel file containing both the names and addresses of Barclays’ Mexican Government Bond Transaction counterparties. A.B. Data electronically processed the data received to ensure adequate address formatting and eliminate duplicate names and addresses. The names and addresses were then loaded into the Notice Mailing Database.

5) On March 31, 2021, Plaintiffs’ Lead Counsel forwarded A.B. Data an Excel file containing both the names and addresses of JPMorgan’s Mexican Government Bond Transaction counterparties. A.B. Data electronically processed the data received to ensure adequate address

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<sup>2</sup> All capitalized terms used, but not defined, shall have the same meanings as in the Stipulation and Agreement of Settlement with Barclays and the Stipulation and Agreement of Settlement with JPMorgan (together the “Settlement Agreements”).

formatting and eliminate duplicate names and addresses. The names and addresses were then loaded into the Notice Mailing Database.

6) A.B. Data maintains a database of the largest banks, brokerage houses, and clearing firms. The names and addresses of these banks, brokerage houses, and clearing firms were also loaded into the Notice Mailing Database.

7) A.B. Data compiled all of the names and addresses referenced in ¶¶ 3-6 above, resulting in 8,552 distinct records for mailing as of April 21, 2021 (the “Initial Mailing List”). A.B. Data standardized and updated the Initial Mailing List addresses using the National Change of Address database (“NCOALink”).

8) Pursuant to Paragraph 13 of the Preliminary Approval Orders, the mailing was to be commenced no later than April 21, 2021 (126 days after entry of the Preliminary Approval Order). On April 21, 2021, A.B. Data caused 8,552 Notice Packets to be mailed via first-class mail, postage prepaid, to persons and entities on the Initial Mailing List. A true and accurate copy of the Notice Packet is attached hereto as Exhibit A.

9) On May 21, 2021, Plaintiffs’ Lead Counsel forwarded to A.B. Data an Excel file produced by a third party in response to a subpoena issued by Plaintiffs containing both the names and addresses of the third party’s Mexican Government Bond Transaction counterparties. A.B. Data electronically processed the data received to ensure adequate address formatting and to eliminate duplicate names and addresses. After formatting and deduplication, the names and addresses were then loaded into the Notice Mailing Database and used to promptly mail Notice Packets. In total, A.B. Data received the names and mailing addresses for 307 additional potential Settlement Class Members from this non-party.

10) From July 14, 2021 through July 16, 2021, Plaintiffs' Lead Counsel forwarded to A.B. Data Excel files produced by additional third parties in response to subpoenas issued by Plaintiffs containing both the names and addresses of their Mexican Government Bond Transaction counterparties. A.B. Data electronically processed the data received to ensure adequate address formatting and to eliminate duplicate names and addresses. The names and addresses were then loaded into the Notice Mailing Database and used to promptly mail Notice Packets. In total, A.B. Data received the names and mailing addresses for 17,164 potential Settlement Class Members from these Defendants.

11) On July 26, 2021 the Court entered an Order Adjourning Fairness Hearing, which adjusted the date of the Fairness Hearing and deadlines related to the Notice Packet, including the objection and opt-out deadlines. To advise any potential Class Members receiving the Notice Packet of the new deadlines, a Supplemental Notice was created and promptly mailed to the 17,164 Class Members referenced above. A true and accurate copy of the Supplemental Notice is attached hereto as Exhibit B.

12) As of September 9, 2021, A.B. Data received an additional 3,118 unique names and addresses of potential Settlement Class Members from individuals or brokerage firms and other nominee holders. A.B. Data electronically processed the data as it was received to ensure adequate address formatting and to eliminate duplicate names and addresses. The names and addresses were then loaded into the Notice Mailing Database, and Notice Packets were promptly mailed to these additional potential Settlement Class Members. A.B. Data has also received requests from brokers and other nominee holders for 245 Notice Packets to be forwarded by the nominees to their customers. All such requests have been, and will continue to be, complied with and addressed in a timely manner.

13) As of September 9, 2021, 2,431 Notice Packets were returned by the USPS to A.B. Data as undeliverable as addressed (“UAA”). None of the returned UAA Notice Packets had a forwarding addresses provided by the U.S.P.S. All returned Notice Packets were processed through LexisNexis and/or other publicly available databases to obtain an updated address. Of these 2,431 Notice Packets, 752 new addresses were obtained and A.B. Data promptly re-mailed the Notice Packets to these potential Settlement Class Members.

14) In aggregate, 30,138 Notice Packets for the Barclays and JPMorgan Settlements were disseminated to potential Settlement Class Members as of September 9, 2021.

#### **MEDIA NOTICE**

15) In accordance with Paragraph 14 of the Preliminary Approval Orders, A.B. Data utilized paid and earned media to reach Settlement Class Members, including national financial newspapers, national financial magazines, national target financial websites, email notice through an email “blast,” national sponsorship of selected financial newsletters, and earned media, including a news release.

16) On April 22, 2021, A.B. Data caused the Publication Notice to be released via PR Newswire’s US1 National Newswire. The US1 National Newswire reaches over 10,000 print and broadcast newsrooms and digital media websites in all 50 states and Puerto Rico. Releases on the US1 Newswire are also distributed to all the major news agencies such as AP, Bloomberg, Reuters, and Dow Jones. A copy of the proof of publication over PR Newswire for the Barclays and JPMorgan Settlements is attached hereto as Exhibit C.

17) Beginning on April 23, 2021, A.B. Data caused the Publication Notice to be placed in each of the following publications. A copy of the Publication Notice for the Barclays and JPMorgan Settlements is attached hereto as Exhibit D.

<b>Publication</b>	<b>Issue Date</b>
<i>The Wall Street Journal</i> (U.S. audience only)	April 23, 2021 and April 28, 2021
<i>Investor's Business Daily</i>	April 26, 2021 and May 3, 2021
<i>Financial Times</i> (U.S. audience only)	April 26, 2021 and May 3, 2021
<i>The Bond Buyer</i>	April 26, 2021 and May 3, 2021
<i>Barron's</i>	April 26, 2021 and May 3, 2021
<i>Stocks &amp; Commodities</i>	June 2021 Issue
<i>Global Capital</i>	April 30, 2021 and May 26, 2021
<i>Hedge Fund Alert</i>	May 5, 2021
<i>Grant's Interest Rate Observer</i>	May 14, 2021, June 11, 2021, and July 23, 2021

18) Beginning on April 26, 2021, A.B. Data caused banner ads to be placed on the websites listed below. Sample copies of the banner ads for the Barclays and JPMorgan Settlements are attached hereto as Exhibit E.

<b>Website</b>	<b>Date</b>
Zacks.com	April 26, 2021 through May 25, 2021
<u>Traders.com</u>	May 3, 2021 through June 1, 2021
<u>GlobalInvestorGroup.com</u>	April 26, 2021 through May 25, 2021
<u>GlobalCapital.com</u>	April 26, 2021 through May 25, 2021

19) Beginning on April 26, 2021, A.B. Data caused banner ads to be placed at the top of newsletters to "opt-in" subscribers of financial newsletters. Sample copies of the banner ads for the Barclays and JPMorgan Settlements are attached hereto as Exhibit F.

<b>E-Newsletter</b>	<b>Date</b>
<i>Global Investor Group</i>	April 26, 2021 through May 25, 2021
<i>Stocks &amp; Commodities</i>	May 12, 2021
<u>Zacks.com</u>	May 12, 2021
<u>Barchart.com</u>	May 3, 2021

20) Beginning on May 5, 2021, A.B. Data created an email “blast” that was sent to “opt-in” subscribers of the publications listed below. Sample copies of the email “blast” for the Barclays and JPMorgan Settlements are attached hereto as Exhibit G.

<b>Publication</b>	<b>Date</b>
<i>Stocks &amp; Commodities</i>	May 18, 2021
<u>Zacks.com</u>	May 5, 2021

### **WEBSITE**

21) In accordance with Preliminary Approval Orders, on April 21, 2021, A.B. Data launched the case-specific settlement website, www.MGBAntitrustSettlement.com. A.B. Data continues to maintain the website and update it with information regarding the Barclays and JPMorgan Settlements. The website lists, among other things, the exclusion, objection, and claim filing deadlines, the date and time of the Fairness Hearing, general information regarding the case and its current status, and provides answers to frequently asked questions. Users of the website can view and download copies of the Settlement Agreements (including exhibits), the Preliminary Approval Orders, the Mailed and Publication Notices, the Claim Form, and copies of other Court documents. A true and accurate copy of the web homepage is attached as Exhibit G.

22) Additionally, the website includes an email address (info@MGBAntitrustSettlement.com) for Claimants to contact A.B. Data with questions or for any additional information.

23) As of September 9, the website has been visited 7,862 times.

24) The website provides functionality for Class Members to submit their claims online. The deadline for Class Members to submit a claim is November 29, 2021. To date, A.B. Data has received 50 claims. A.B. Data expects to receive substantial additional claims

through the claim deadline. After the claim deadline passes, A.B. Data will undertake audits and secondary reviews of the submitted claims to flag invalid or suspicious claims and request additional information from those claimants.

**TOLL-FREE TELEPHONE LINE**

25) In accordance with the Preliminary Approval Orders, on April 21, 2021, a case-specific toll-free number, 877-829-2941, was established (as well as a toll number for callers outside of the United States and Canada) with an Interactive Voice Response system and live operators. Callers to the numbers are presented with a series of choices to respond to basic questions. If callers need further help, they have the option to be transferred to a live operator during business hours. The toll-free number has been updated with information about the Barclays and JPMorgan Settlements.

26) As of September 9, 2021, 80 callers have called the toll-free number.


**REPORT ON OBJECTIONS AND REQUESTS FOR  
EXCLUSION RECEIVED TO DATE**

27) The Mailed Notice informed Settlement Class Members that written objections and requests for exclusion from the Settlement Class must be filed or mailed by September 23, 2021. To date, A.B. Data has not received any objections and has received one (1) request for exclusion from the Barclays and JPMorgan Settlements. A.B. Data will submit a supplemental Declaration after the September 23, 2021 objection and opt-out deadlines that will address any additional objections or requests for exclusion received.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Executed on September 9, 2021, in Milwaukee, Wisconsin.



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STEVEN STRAUB