

**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 VINCENT BRIGANTI ON BEHALF OF LOWEY DANNENBERG,  
P.C. IN SUPPORT OF PLAINTIFFS' LEAD COUNSEL'S MOTION FOR AN AWARD  
OF ATTORNEYS' FEES AND PAYMENT OF EXPENSES**

I, Vincent Briganti, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the Bar of this Court and Chairman of the law firm Lowey Dannenberg, P.C. (“Lowey” or “Plaintiffs’ Lead Counsel”). I respectfully submit this declaration in support of Plaintiffs’ Lead Counsel’s Motion for an Award of Attorneys’ Fees and Payment of Expenses in connection with the services rendered in the Action and the proposed class action settlements with Barclays and JPMorgan.<sup>1</sup>

2. The statements herein are true to the best of my personal knowledge, information and belief based on Lowey’s books and records and information received from its attorneys and staff.

3. Lowey serves as the Court-appointed Plaintiffs’ Lead Counsel in this Action.

4. I am the partner who oversaw my firm’s involvement in the Action, working together with partner Christian Levis, and associates Roland St. Louis, Charles Kopel and Bracha Gefen. Lowey’s time and expense records (including, where necessary, backup documentation) have been reviewed to confirm both the accuracy of the entries as well as the necessity for and reasonableness of the time and expenses expended in this litigation. As a result of this review, certain reductions were made either in the exercise of billing judgment or to conform to with Lowey’s practice or the directions developed for the purpose of managing this Action. As a result of this review and related reductions, the time reflected in Lowey’s lodestar calculation and the expenses for which payment is sought are reasonable in amount and were necessary to prosecute the Action and achieve the settlements before the Court. In addition, these fees and expenses are often charged by Lowey to its fee-paying clients.

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<sup>1</sup> Unless otherwise defined herein, all capitalized terms have the same meanings ascribed to them in the Stipulations and Agreement of Settlement with Barclays and JPMorgan, dated March 27, 2020, attached as Exhibits 1 and 2 to the Declaration of Vincent Briganti, Esq. dated June 1, 2020. ECF Nos. 211-1; 211-2.

5. Set forth below in ¶ 7 are the hours worked by Lowey’s attorneys and professional staff related to this Action from the inception of the case through May 31, 2020, and the corresponding lodestar value of that time. The schedule in ¶ 7 was prepared based upon daily time records maintained by Lowey’s attorneys and professional support staff in the ordinary course of business, and the lodestar calculations are based on the firm’s current hourly billing rates.

6. The services Lowey performed on behalf of the Class are set forth in in connection with the prosecution of this Action from its inception through May 31, 2020 are set forth in the Declaration of Vincent Briganti in Support of (A) Plaintiffs’ Motion for Final Approval of Class-Action Settlements; and (B) Plaintiffs’ Lead Counsel’s Motion for an Award of Attorneys’ Fees and Payment of Expenses, filed herewith.

7. Lowey’s total fee compensable time for which it seeks an award of attorneys’ fees is summarized below.

<b>Attorneys</b>	<b>Role<sup>2</sup></b>	<b>Rates</b>	<b>Hours from inception to 5/31/2020</b>	<b>Lodestar from inception to 5/31/2020</b>
Vincent Briganti	P	1025	659.50	\$675,987.50
Geoffrey M. Horn	P	1025	124.50	\$127,612.50
Barbara J. Hart	P	980	63.80	\$62,524.00
Margaret C. MacLean	P	850	50.50	\$42,925.00
Christian Levis	P	775	411.30	\$318,757.50
Sitso Bediako	SA	675	283.50	\$191,362.50
Frank Strangeman	SA	675	131.00	\$88,425.00
Jonathan Seredynski	SA	675	19.50	\$13,162.50
Jennifer Tembeck	SA	620	202.50	\$125,550.00
Peter Demato Jr.	SA	620	68.80	\$42,656.00
Roland St. Louis III	A	620	1,956.40	\$1,212,968.00
Ian Sloss	A	550	65.90	\$36,245.00

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<sup>2</sup> “P” refers to Partners. “SA” refers to Senior Associates. “A” refers to Associates. “PL” refers to Paralegals.

<b>Attorneys</b>	<b>Role<sup>2</sup></b>	<b>Rates</b>	<b>Hours from inception to 5/31/2020</b>	<b>Lodestar from inception to 5/31/2020</b>
Charles Kopel	A	455	839.30	\$381,881.50
Anthony Christina	A	455	22.60	\$10,283.00
Sylvie Bourassa	A	430	34.80	\$14,964.00
Amanda Fiorilla	A	430	83.60	\$35,948.00
Samantha Breitner	A	430	18.20	\$7,826.00
Bracha Gefen	A	430	203.70	\$87,591.00
Henry Kusjanovic	A	430	122.50	\$52,675.00
Thomas Griffith	A	430	117.10	\$50,353.00
Amir Alimehri	A	410	13.70	\$5,617.00
James Pedersen	A	400	24.40	\$9,760.00
Timothy Rode	A	390	283.00	\$110,370.00
Grace Lee	A	380	127.40	\$48,412.00
Matthew Acocella	A	375	103.30	\$38,737.50
Matthew Roberts	A	370	22.20	\$8,214.00
Anthony Odorisi	A	365	454.90	\$166,038.50
Shelley Chauncey	A	365	22.30	\$8,139.50
Henry Kusjanovic (Document Review)	A	350	4.10	\$1,435.00
Mathew Roberts (Document Review)	A	350	0.30	\$105.00
Amir Alimehri (Document Review)	A	350	2.00	\$700.00
Joseph Mansilla	A	350	20.40	\$7,140.00
<b>Paralegals and Legal Assistants</b>				
Katherine Vogel	PL	300	21.60	\$6,480.00
<b>TOTALS</b>			<b>6,578.60</b>	<b>\$3,990,845.50</b>

8. The total time for which my firm is requesting an award of legal fees is 6,578.60 hours. The total lodestar value of these professional services is \$3,990,845.50.

9. The above hourly rates for Lowey's attorneys and professional support staff are the firm's current hourly rates. The hourly rates for attorneys and professional support staff in my firm are the same as the regular rates charged for their services in contingent fee matters and

non-contingent fee matters. Each attorney and support staff listed above was a full-time employee of the firm while working on this case. Timekeepers with less than 15 hours were excluded. For personnel no longer employed by Lowey, the lodestar calculation is based on the billing rates for such personnel in his or her final year of employment. The time and lodestar spent preparing the Fee and Expense Application were also excluded from the above values. Further, work relating to first-level document review was capped at \$350 per hour. As a result, the reflected lodestar for certain timekeepers is less than the product of their total hours and their hourly rate.

10. The firm's lodestar figures do not include charges for expense items. Expense items are billed separately, and such charges are not duplicated in the firm's current billing rates. Further, expense items do not contain any general overhead costs and do not contain a surcharge over the amount paid to the corresponding vendor(s).

11. To share in the cost of litigation, Plaintiffs' Lead Counsel (and certain Plaintiffs' Counsel) contributed to a litigation fund administered by Lowey. Lowey also separately incurred expenses in prosecuting the Action. From the inception of the Action through May 31, 2020, the expenses paid by the litigation fund totaled \$192,853.11 and the separate expenses paid by Lowey totaled \$95,182.97. The category of expenses paid by the litigation fund and by Lowey are summarized below.

<b>Expense Categories</b>	<b>Litigation Fund</b>	<b>Lowey</b>
Court Costs		\$1,006.00
Document Production	\$1,687.50	\$340.83
Experts/consultants	\$185,460.61	\$73,242.76
Federal Express		\$1,265.83
Computer Research		\$10,045.93
Messenger/delivery		\$42.50
Photocopies - in House		\$6,761.20

Postage		\$2.00
Service of Process	\$5,705.00	\$1,071.20
Telephone/telecopier		\$441.09
Travel		\$879.43
Miscellaneous		\$84.20
<b>TOTAL</b>	\$192,853.11	\$95,182.97

12. The expenses described herein are contained in Lowey's books and records.

These books and records are prepared from expense vouchers, check records, receipts and other source materials and are an accurate record of the expenses.

13. The major expense categories include:

a. Expert fees: \$73,242.76 (Lowey expense); \$185,460.61 (litigation fund expense). Collaboration with experts has been an integral part of Lowey's strategy to advance the action. Since 2018, Lowey has consulted with leading economics and industry experts to develop the theory of the case, support Plaintiffs' allegations, and inform counsel's litigation and discovery strategy. Throughout the investigation and prosecution of this Action, Lowey corresponded with experts regarding economic analysis performed on the Mexican Government Bond market and worked closely with experts to understand the impact of such analysis on the allegations of Plaintiffs' claims. Experts also assisted with the development of the Distribution Plan.

b. Data, Legal & Financial Research: \$10,045.93 (Lowey expense). Lowey pays a bundled rate to use Westlaw's services and allocates the cost according to usage during the billing period through the use of a case code. Lowey's bundled rate provides for significant savings as compared to the typical market rate charged by Westlaw.

14. The expense total does not include contributions made by Lowey to the litigation fund established to fund various litigation expenses. The above schedule was prepared based

upon expense records reflected in the books and records of Lowey. These books and records are prepared from expense vouchers, check records, receipts and other source materials.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 9, 2021  
White Plains, New York

/s/ Vincent Briganti  
Vincent Briganti