

**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 DARYL F. SCOTT ON BEHALF OF
SCOTT+SCOTT ATTORNEYS AT LAW LLP
IN SUPPORT OF PLAINTIFFS' LEAD COUNSEL'S MOTION FOR
AWARD OF ATTORNEYS' FEES AND PAYMENT OF EXPENSES**

I, Daryl F. Scott, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I am a partner with the law firm Scott+Scott Attorneys at Law LLP (“Scott+Scott” or the “Firm”).

2. I submit this fee and expense declaration (the “Declaration”) in support of Plaintiffs’ Lead Counsel’s Motion for an Award of Attorneys’ Fees and Payment of Expenses in connection with the legal services rendered by my Firm in the litigation and the proposed class action settlements with Barclays and JPMorgan in the above captioned litigation (the “Action”).

3. The statements made in this Declaration are based on my personal knowledge and belief as a result of my review of the accounting reports maintained by my Firm and other information I received from attorneys and staff members at my Firm.

4. Scott+Scott is Plaintiffs’ Counsel and counsel of record for United Food and Commercial Workers Union and Participating Food Industry Employers Tri-State Pension Fund, named Plaintiff in the Action.

5. I am the partner who oversaw the Firm’s work in the Action. I reviewed the Firm’s time and expense records to confirm the accuracy and reasonableness of, and the necessity for, the lodestar and expenses submitted in this Declaration.

6. Certain time entries and certain items of expense were reduced or removed by me, as I determined were necessary or prudent, in accordance with my Firm’s best practices and in accordance with the directions of Plaintiffs’ Lead Counsel. As a result, I believe that the time submitted in this Declaration, from which the Firm’s lodestar is calculated and expense reimbursement is sought, are reasonable and necessary to prosecute the Action and to resolve the settlements now before the Court.

7. During the course of this Action following the filing of our client's complaint, Scott+Scott worked on assignments it was asked to perform by Plaintiffs' Lead Counsel on behalf of the class. The assignments included, but were not limited to, the following:

- a. worked on the amended consolidated complaint;
- b. organization of counsel;
- c. briefed various rounds of the motions to dismiss;
- d. participated in mediation and settlement; and
- e. reviewed and analyzed defendants' document production.

8. Set forth in paragraph 9, is a schedule summarizing the amount of time (after reductions) expended by each of the Firm's attorneys and professional staff from the inception of the Action through May 31, 2020, and the corresponding lodestar value of that work (the "Lodestar Schedule"). The Lodestar Schedule was prepared based upon daily time records maintained by Scott+Scott'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.

9. Scott+Scott's total hours expended in the Action as set forth in the Lodestar Schedule is 1,216.2 and Scott+Scott's total lodestar is \$899,234.50.

Attorneys	Title	Hourly Rates	Hours from inception to 5/31/20	Lodestar from inception to 5/31/20
David R. Scott (P)	P	1,295.00	27.60	35,742.00
Daryl F. Scott (P)	P	1,150.00	17.80	20,470.00
Christopher Burke (P)	P	1,295.00	137.30	177,803.50
Walter Noss (P)	P	1,095.00	18.40	20,148.00
Amanda Lawrence (P)	P	995.00	35.70	35,521.50
Peter Barile (P)	P	995.00	87.10	86,664.50
Thomas Boardman (A)	A	750.00	326.60	244,950.00
Hal Cunningham (A)	A	750.00	109.40	82,050.00
Michelle Conston (A)	A	650.00	116.00	75,400.00
Brandon Zapf (A)	SA	400.00	73.50	29,400.00
Nga Cunningham (A)	SA	350.00	25.60	8,960.00
Voltaire Sterling (A)	SA	350.00	110.80	38,780.00
Ana Del Castillo (A)	SA	350.00	84.50	29,575.00
Paralegals and Legal Assistants				
Ellen DeWan (PL)	PL	300.00	45.90	13,770.00
TOTALS			1,216.2	\$ 899,234.50

10. Hourly rates for attorneys and professional support staff are listed at their current hourly rates. The hourly rates submitted in the Lodestar Schedule are similar to hourly rates Scott+Scott has submitted to, and were accepted by, other courts in complex class action litigation such as this.

11. Timekeepers with less than 15 hours were excluded from the Lodestar Schedule and the hourly rates of timekeepers no longer employed by the Firm were based on the billing rates for such personnel in his or her final year of employment. Time spent preparing this Declaration was excluded from the Schedule.

12. The Lodestar Schedule excludes items of expense which were billed separately and are presented in paragraph 13. Expenses are being submitted at the Firm's out-of-pocket cost and do not include overhead or other mark-ups. Note that the expense total does not include our

\$50,000 contribution to the litigation fund established by Lead Counsel to fund various litigation expenses.

13. From inception of the Action through May 31, 2020, the expenses for which the Firm seeks reimbursement from the Settlement Fund total \$6,579.71.

Expense Categories	Cumulative Expenses
Court Costs	\$400.00
Computer Research	\$4,762.52
Photocopies - in House	\$885.50
Postage	\$0.47
Special Supplies	\$44.80
Telephone/telecopier	\$363.83
Travel	\$122.59
TOTAL	\$6,579.71

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

Executed on July 26, 2021
Richmond, Virginia


Daryl F. Scott