

**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 THOMAS H. BURT ON BEHALF OF  
WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLP  
IN SUPPORT OF PLAINTIFFS' LEAD COUNSEL'S MOTION FOR AWARD OF  
ATTORNEYS' FEES AND PAYMENT OF EXPENSES**

I, Thomas H. Burt, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a partner with the law firm Wolf Haldenstein Adler Freeman & Herz LLP (“WHAFH”). 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 J.P. Morgan).

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

3. This firm serves as one of the Plaintiffs’ Counsel and at the outset of the litigation was counsel of record for Metropolitan Transportation Authority Defined Benefit Pension Plan Master Trust, a named Plaintiff in the action. WHAFH still currently serves as counsel for named Plaintiff Boston Retirement System.

4. I am the partner who oversaw my firm’s involvement in the Action. WHAFH’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 to both time and expenses in the exercise of billing judgment, directions from Plaintiffs’ Lead Counsel or my firm’s practice. As a result of this review and related reductions, the time reflected in WHAFH’s lodestar calculation and the expenses for which payment is sought are reasonable in amount and were necessary to prosecute the Action and resolve the settlement before the Court. In addition, these fees and expenses are often charged by WHAFH to its fee-paying clients.

5. During the course of this litigation, and as detailed herein, WHAFH worked on assignments that it was specifically directed to perform by Plaintiffs' Lead Counsel.

6. Set forth below in ¶ 8 is a summary reflecting the amount of time (after any applicable reductions) WHAFH attorneys and professional staff worked on the Action from the inception of the case through May 31, 2020, and the corresponding lodestar value of that work. The schedule in ¶ 8 was prepared based upon daily time records maintained by WHAFH 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.

7. The services WHAFH performed on behalf of the putative class include, but are not limited to, the following: drafting client advisories; drafting and editing plaintiffs' brief in opposition to defendants' motion to dismiss the first amended complaint; researching and drafting plaintiffs' brief in opposition to defendants' motion to dismiss the second amended complaint.

8. WHAFH's total fee compensable time for which it seeks an award of attorneys' fees is summarized below.

<b>Attorneys</b>	<b>Role<sup>1</sup></b>	<b>Rates</b>	<b>Hours from inception to 5/31/2020</b>	<b>Lodestar from inception to 5/31/2020</b>
Fred T. Isquith	P	\$945	195.3	\$184,558.50
Thomas H. Burt	P	\$730	56.1	\$40,953.00
Gregory M. Nespole	P	\$880	55.6	\$48,928.00
Regina M. Calcaterra	P	\$790	67.4	\$53,246.00
Correy A. Kamin	A	\$370	31.6	\$11,692.00
Veronica Bosco	A	\$340	78.0	\$26,520.00

<sup>1</sup> "P" refers to Partners. "OC" refers to Of Counsel. "SA" refers to Senior Associates. "A" refers to Associates. "LC" refers to Law Clerks. "PL" refers to Paralegals. "SA" refers to Staff Attorneys. "FA" refers to Financial Analysts.

<b>Paralegals and Analysts</b>				
Gregory L. Stone	FA	\$475	41.5	\$19,712.50
Jim Cirigliano	PL	\$300	36.2	\$10,860.00
<b>TOTALS</b>			<b>561.7</b>	<b>\$396,470.00</b>

9. The total time for which my firm is requesting an award of legal fees is 561.7 hours. The total lodestar value of these professional services is \$396,470.

10. The above hourly rates for WHAFH'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. Timekeepers with less than 15 hours were excluded. For personnel no longer employed by WHAFH, 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.

11. 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).

12. As detailed and categorized in the below schedule, WHAFH has incurred a total of \$4,869.40 in expenses from inception through May 31, 2020 for which it seeks to be reimbursed from the Settlement Fund.

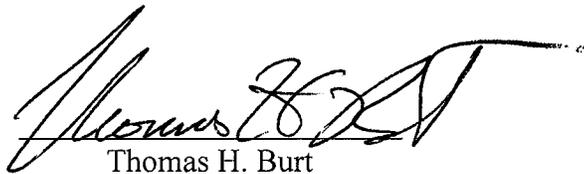
<b>Expense Categories</b>	<b>Cumulative Expenses</b>
Court Costs	\$800.00
Computer Research	\$2,032.16
Photocopies - in House (copying at \$.10 per page, scanning at \$.05 per page)	\$1,539.85

Postage	\$ .47
Travel	\$88.16
Miscellaneous	\$408.76
<b>TOTAL</b>	<b>\$4,869.40</b>

13. The expense total does not include contributions made by WHAFH to the litigation fund established by Lead Counsel to fund various litigation expenses. The above schedule was prepared based upon expense records reflected in the books and records of WHAFH. 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 Aug. 31, 2021  
New York, New York

  
Thomas H. Burt