

**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 SCOTT MARTIN ON BEHALF OF HAUSFELD LLP
IN SUPPORT OF PLAINTIFFS' LEAD COUNSEL'S MOTION FOR AWARD OF
ATTORNEYS' FEES AND PAYMENT OF EXPENSES**

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

1. I am a partner with the law firm Hausfeld LLP (“Hausfeld”) and a member of the bar of the Southern District of New York. 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.

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

3. Hausfeld serves as one of the Plaintiffs’ Counsel and is counsel of record for Plaintiff Manhattan and Bronx Surface Transit Operating Authority (“MaBSTOA”) and Plaintiff Metropolitan Transportation Authority (“MTA”) Defined Benefit Pension Plan Master Trust, who have served as named Plaintiffs in the Action.

4. I am the attorney who oversaw my firm’s involvement in the Action. Hausfeld’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 either in the exercise of billing judgment or to conform to Hausfeld’s agreement with MaBSTOA and MTA Defined Benefit Pension Plan Mater Trust, directions from Plaintiffs’ Lead Counsel or my firm’s practice. As a result of this review and related reductions, the time reflected in Hausfeld’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.

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

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

7. The services Hausfeld performed on behalf of the putative class include, but are not limited to, the following:

- Drafted, revised, and edited the complaint;
- Conducted research related to the drafting of the complaint;
- Provided strategy and analysis related to allegations presented in the complaint;
- Drafted sections of Plaintiffs' Memorandum In Opposition To Defendants' Motion To Dismiss;
- Provided strategy and analysis related to the arguments set forth in Plaintiffs' Memorandum In Opposition To Defendants' Motion To Dismiss; and
- Discussed and strategized regarding potential settlements.

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

Attorneys	Role¹	Rates	Hours from inception to 5/31/2020	Lodestar from inception to 5/31/2020
Scott Martin	P	1,150	42.70	49,105
Michael Lehmann	P	1,150	70.50	81,075
Hilary Scherrer	P	850	24.20	20,570
Jeanette Bayoumi	SA	530	70.70	37,471
TOTALS			208.10	188,221.00

9. The total time for which my firm is requesting an award of legal fees is 208.10 hours. The total lodestar value of these professional services is \$188,221.

10. The above hourly rates for Hausfeld's attorneys and professional support staff are the firm's current hourly rates. All of these individuals remain at the firm and have recently worked on the matter, as needed, or are available to do so. 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 for my own work includes matters for various clients billed and paid on a non-contingent (hourly) basis, including work performed at full rack rates without discounts. Timekeepers with fewer than 15 hours during this period were excluded from the totals. 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).

¹ "P" refers to Partners. "SA" refers to Senior Associates.

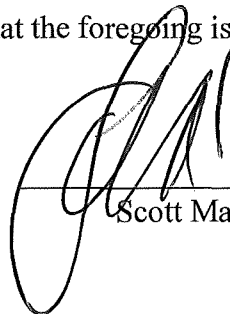
12. As detailed and categorized in the below schedule, Hausfeld has incurred a total of \$19,506.05 in expenses from inception through May 31, 2020 for which the firm seeks to be reimbursed from the Settlement Fund.

Expense Categories	Cumulative Expenses
Court Costs	26.80
Experts/consultants	18,489.37
Computer Research	977.76
Photocopies - in House	12.12
TOTAL	19,506.05

13. The above schedule was prepared based upon expense records reflected in the books and records of Hausfeld. 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 July 26, 2021
New York, NY



Scott Martin