

**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 LESLEY E. WEAVER ON BEHALF OF  
BLEICHMAR FONTI & AULD LLP IN SUPPORT OF PLAINTIFFS' LEAD  
COUNSEL'S MOTION FOR AWARD OF ATTORNEYS' FEES AND PAYMENT OF  
EXPENSES**

I, Lesley E. Weaver, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a partner with the law firm Bleichmar Fonti & Auld LLP (“BFA”). 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 BFA’s books and records and information received from its attorneys and staff.

3. This firm serves as one of the Plaintiffs’ Counsel and is counsel of record for Southeastern Pennsylvania Transportation Authority (“SEPTA”) who serves as a named Plaintiff in the Action.

4. I am the partner who oversaw my firm’s involvement in the Action. BFA’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 our agreement with SEPTA, directions from Plaintiffs’ Lead Counsel or my firm’s practice. As a result of this review and related reductions, the time reflected in BFA’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 client’s complaint, and as detailed herein, BFA 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) BFA 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 BFA 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 BFA performed on behalf of the putative class include, but are not limited to, the following:

- Researched and analyzed claims, drafted complaint;
- Analyzed purchase and pricing data as well as economic materials to assess damages; worked with experts to create damages model;
- Conducted research, drafted portions of Plaintiffs’ Opposition to Defendants’ Motion to Dismiss.

8. BFA’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>
Lindley, Robert	SA	360	21.90	\$7,884.00
Ornelas, Angelica	A	655	34.00	\$22,270.00
Simnowitz, Sara	OC	710	21.10	\$14,981.00
Weaver, Lesley	P	885	124.60	\$110,271.00
Weiler, Matthew	A	655	148.40	\$97,202.00
<b>TOTALS</b>			350.00	\$252,608.00

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<sup>1</sup> “P” refers to Partners. “OC” refers to Of Counsel. “A” refers to Associates. “SA” refers to Staff Attorneys.

9. The total time for which my firm is requesting an award of legal fees is 350.00 hours. The total lodestar value of these professional services is \$252,608.00.

10. The above hourly rates for BFA'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 BFA, 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, BFA has incurred a total of \$1,206.33 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	625.56
Federal Express	50.71
Computer Research	150.81
Telephone/telecopier	0.46
Travel	378.79
<b>TOTAL</b>	<b>\$1,206.33</b>

13. The above schedule was prepared based upon expense records reflected in the books and records of BFA. 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  
Oakland, CA



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Lesley E. Weaver