

**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 JOHN D. RADICE ON BEHALF OF THE RADICE LAW FIRM
IN SUPPORT OF PLAINTIFFS' LEAD COUNSEL'S MOTION FOR AWARD OF
ATTORNEYS' FEES AND PAYMENT OF EXPENSES**

I, John D. Radice, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a partner with the Radice Law Firm, PC (“RLF”). 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 Barclays and JPMorgan.

2. The statements herein are true to the best of my personal knowledge, information and belief based on the RLF’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 Plaintiff United Food and Commercial Workers Union and Participating Food Industry Employers Tri-State Pension Fund (“UFCW Tri-State”) who serves as a named Plaintiff in the Action.

4. I am the partner who oversaw my firm’s involvement in the Action. RLF’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, or based on directions from Plaintiffs’ Lead Counsel or my firm’s practice. As a result of this review and related reductions, the time reflected in RLF’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 the RLF to its hourly-fee-paying clients.

5. During the course of this litigation following the filing of our client's complaint, and as detailed herein, the RLF 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) RLF 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 RLF 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 the RLF performed on behalf of the putative class include, but are not limited to, the following: reviewing and analyzing transactional data for client UFCW in preparation for drafting and filing complaint; researching and developing facts for allegations in UFCW complaint; reviewing thousands of pages of documents produced by defendants.

8. RLF'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
John Radice	P	\$795	29.3	\$23,293.50
Daniel Rubenstein	OC	\$605	73.6	\$44,528.00
Rishi Raithatha	OC	\$475	5.8	\$2,755.00
Rishi Raithatha (doc review)	OC	\$350	38.8	\$13,580.00
TOTALS			147.5	\$84,156.50

¹ "P" refers to Partners. "OC" refers to Of Counsel.

9. The total time for which my firm is requesting an award of legal fees is 147.5 hours. The total lodestar value of these professional services is \$84,156.50.

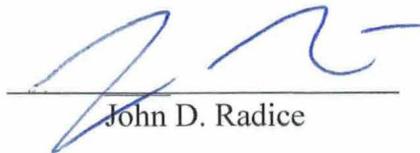
10. The above hourly rates for RLF's attorneys and professional support staff are the firm's current hourly rates. The hourly rates for attorneys and professional support staff in my firm are the same as the regular rates charged for their services in contingent fee matters and non-contingent fee matters. Timekeepers with fewer than 15 hours were excluded. For personnel no longer employed by RLF, 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. The RLF is not seeking reimbursement for any expenses related to this matter.

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

Executed on July 26, 2021
Princeton, New Jersey



John D. Radice