

**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 JEFFREY B. GITTLEMAN ON BEHALF OF  
BARRACK, RODOS & BACINE IN SUPPORT OF PLAINTIFFS' LEAD COUNSEL'S  
MOTION FOR AWARD OF ATTORNEYS' FEES AND PAYMENT OF EXPENSES**

I, Jeffrey B. Gittleman, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a partner with the law firm of Barrack, Rodos & Bacine (the "Firm"). 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 the Firm'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 Government Employees' Retirement System of the Virgin Islands, who serves as a named Plaintiff in this Action.

4. I am the partner who oversaw my firm's involvement in the Action. The Firm'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 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 the Firm'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, the Firm 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) the Firm's attorneys worked on in 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 the Firm's attorneys in the ordinary course of business, and the lodestar calculations are based on the Firm's current hourly billing rates.

7. The services the Firm performed on behalf of the putative class include, but are not limited to, the following: investigated the Mexican Government Bond Market; conducted research regarding discovery in Mexico for United States litigation; analyzed transactions data; performed factual research for use in the operative Complaints; assisted and drafted memos regarding responses to Defendants' motions to dismiss; drafted a memo regarding witnesses and cast of characters; provided assistance with briefs in support of settlement agreements; incorporated comments on behalf of Government Employees' Retirement System of the Virgin Islands in all pleadings and motions.

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

	<u>Role</u>	<u>Hourly Rates</u>	<u>Hours from inception to 5/31/2020</u>	<u>Lodestar from inception to 5/31/2020</u>
<b><u>Attorneys:</u></b>				
Jeffrey B. Gittleman	Partner	\$800	48.50	\$38,800.00
Jeffrey A. Barrack	Partner	\$800	53.00	\$42,400.00
William J. Ban	Partner	\$710	116.60	\$82,786.00
<b>Totals:</b>			<b><u>218.10</u></b>	<b><u>\$163,986.00</u></b>

9. The total time for which my firm is requesting an award of legal fees is **218.10** hours. The total lodestar value of these professional services is **\$163,986.00**.

10. The above hourly rates for the Firm's attorneys are the firm's current hourly rates. The hourly rates for attorneys in my Firm are the same as the regular rates charged for their services in contingent fee matters. Timekeepers with less than 15 hours were excluded. 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).

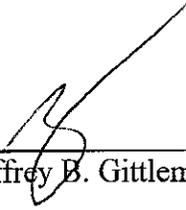
12. As detailed and categorized in the below schedule, the Firm has incurred a total of **\$1,530.43** in expenses from inception through May 31, 2020 for which it seeks to be reimbursed from the Settlement Fund.

<u>Description</u>	<u>Amount</u>
Computer & Other Research Fee(s)	\$174.29
Court & Filing Fee(s)	\$800.00
Postage	\$10.53
Telephone	\$545.61
<b>Total:</b>	<b><u>\$1,530.43</u></b>

13. The expense total does not include contributions made by the Firm to the litigation fund established by Plaintiffs' Lead Counsel to fund various litigation expenses. The above schedule was prepared based upon expense records reflected in the books and records of the Firm. 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 August 31, 2021  
Philadelphia, Pennsylvania



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Jeffrey B. Gittleman