

**IMPORTANT LEGAL NOTICE TO ALL MEMBERS OF THE CLASS
FORWARD TO CORPORATE HEADQUARTERS/LEGAL COUNSEL**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Mexican Government Bonds Antitrust Litigation

No. 18-cv-02830 (JPO)

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENTS,
SEPTEMBER 13, 2021 FAIRNESS HEARING THEREON AND CLASS MEMBERS' RIGHTS**

TO: ALL PERSONS THAT ENTERED INTO A MEXICAN GOVERNMENT BOND TRANSACTION¹ AT ANY TIME BETWEEN AT LEAST JANUARY 1, 2006, AND APRIL 19, 2017, WHERE SUCH PERSONS WERE EITHER DOMICILED IN THE UNITED STATES OR ITS TERRITORIES OR, IF DOMICILED OUTSIDE THE UNITED STATES OR ITS TERRITORIES, TRANSACTED IN THE UNITED STATES OR ITS TERRITORIES.

*A federal court authorized this Notice. This is not a solicitation from a lawyer.
You are not being sued.*

PLEASE READ THIS ENTIRE NOTICE CAREFULLY. A UNITED STATES FEDERAL COURT AUTHORIZED THIS NOTICE. YOUR RIGHTS MAY BE AFFECTED BY THE PROCEEDINGS IN THIS ACTION. THIS NOTICE ADVISES YOU OF YOUR RIGHTS AND OPTIONS WITH RESPECT TO THIS ACTION, INCLUDING WHAT YOU MUST DO IF YOU WISH TO SHARE IN THE PROCEEDS OF THE SETTLEMENTS. TO CLAIM YOUR SHARE OF THE SETTLEMENTS, YOU MUST ELECTRONICALLY SUBMIT YOUR CLAIM ON OR BEFORE OCTOBER 13, 2021 OR MAIL YOUR CLAIM TO THE ADDRESS IN SECTION VIII POSTMARKED NO LATER THAN OCTOBER 13, 2021.

If you are a brokerage firm, swaps dealer, or trustee through whom Mexican Government Bonds (“MGBs”)² were traded from January 1, 2006 through April 19, 2017, inclusive, on behalf of customers that are members of the Settlement Class as defined in Section I.C. below, you must provide the name and last known address of such customers to the Settlement Administrator at the address listed in Section VIII below within two weeks of receiving this Notice. The Settlement Administrator will cause copies of this Notice to be forwarded to each customer identified at the address so designated.

This Notice of Proposed Class Action Settlement, September 13, 2021 Fairness Hearing Thereon and Class Members’ Rights (“Notice”) is given pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Southern District of New York (the “Court”). It is not junk mail, an advertisement, or a solicitation from a lawyer. You have not been sued. The purpose of this Notice is to inform you of the pendency of the above-captioned class action and your rights in connection with the proposed Settlements and release of the claims asserted.

A class action is a lawsuit in which one or more representative plaintiffs (in this case, Plaintiffs) bring a lawsuit on behalf of themselves and other similarly situated persons (*i.e.*, a class) who have similar claims against the defendants. The representative plaintiffs, the court, and counsel appointed to represent the class have a responsibility to make sure that the interests of class members are adequately represented.

You are receiving this Notice because records indicate that you may have transacted in one or more Mexican Government Bond Transactions during the Class Period and may be a Settlement Class Member in this class action.

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE. Inquiries concerning this Notice, the Proof of Claim and Release (the “Claim Form”), or any other questions from Settlement Class Members should be directed to:

Mexican Government Bonds Antitrust Settlement
c/o A.B. Data, Ltd.
P.O. Box 173123
Milwaukee, WI 53217
Tel.: 877-829-2941
(if calling from outside the United States or Canada, call 1-414-961-6592)
Email: info@MGBAntitrustSettlement.com
Website: www.MGBAntitrustSettlement.com

The Settling Defendants are Barclays PLC, Barclays Bank PLC, Barclays Capital Inc., Barclays Capital Securities Limited, Barclays Bank México, S.A., Institución de Banca Múltiple, Grupo Financiero Barclays México, and Grupo Financiero Barclays

¹ “Mexican Government Bond Transaction” means any purchase, sale, or exchange of Mexican Government Bonds, whether in the primary, secondary, or any other market.

² “Mexican Government Bonds” means any debt securities issued by the United Mexican States (“Mexico”) that are Mexican Peso-denominated, including, but not limited to, CETES, Bondes D, UDIBONOS, and BONOS.

México, S.A. de C.V. (collectively “Barclays”) and JPMorgan Chase & Co., J.P. Morgan Broker-Dealer Holdings Inc., J.P. Morgan Securities LLC, JPMorgan Chase Bank, National Association, Banco J.P. Morgan, S.A. Institución de Banca Múltiple, J.P. Morgan Grupo Financiero, and J.P. Morgan Securities plc (collectively “JPMorgan”). Barclays and JPMorgan have denied and continue to deny Plaintiffs’ claims.

To resolve all Released Claims against all Released Parties, Barclays has agreed to pay a total of \$5.7 million dollars and JPMorgan has agreed to pay a total of \$15 million dollars.³ Plaintiffs entered into a settlement agreement with Barclays on March 27, 2020 and entered into a separate settlement agreement with JPMorgan on March 27, 2020 (the “Settlement Agreements”).⁴ The two settlements contained in the Settlement Agreements are referred to as the “Settlements,” and are jointly addressed by this Notice for efficiency and convenience.

Settling Defendants have also agreed to certain cooperation obligations, which will assist Plaintiffs in prosecuting the claims against the remaining Defendants. Barclays and JPMorgan have each agreed to provide interbank chat communications, transaction data, and documents or information from the Class Period relevant to the allegations made in the Action.

The Court has preliminarily approved the Settlements with Barclays and JPMorgan. The Court has appointed the lawyers listed below to represent you and the Settlement Class in this Action (“Plaintiffs’ Lead Counsel”):

Vincent Briganti
LOWEY DANNENBERG, P.C.
44 S. Broadway, Suite 1100
White Plains, NY 10601
Telephone: (914) 733-7221
vbriganti@lowey.com

Only Members of the Settlement Class Who Submit a Valid Claim Form in Response to this Notice Will Be Eligible to Participate in the Net Settlement Funds. Assuming final approval by the Court, the twenty million seven-hundred thousand dollars (\$20,700,000), plus interest, in Settlement Funds obtained from the Settling Defendants, net of such attorneys’ fees, costs, fees, taxes, and other deductions as are approved by the Court (the “Net Settlement Funds”), will be distributed to the members of the Settlement Class who properly complete and timely return a valid Claim Form, and are entitled to distribution under the Distribution Plan.

Fairness Hearing and Right to Object. The Court has scheduled a public hearing on final approval of the Settlements for September 13, 2021 (“Fairness Hearing”). The purpose of the Fairness Hearing is to determine, among other things, whether the Settlements, the Distribution Plan, and the application by Plaintiffs’ Lead Counsel for attorneys’ fees and payment of expenses are fair, reasonable, and adequate. If you remain in the Settlement Class, then you may object to any aspect of the Settlements, the Distribution Plan, Plaintiffs’ Lead Counsel’s request for attorneys’ fees and payment of expenses, or any other matters. *See* Section III.B below. **All objections must be made in accordance with the instructions set forth below and must be filed with the Court and served on Plaintiffs’ Lead Counsel, Barclays’ Counsel, and JPMorgan’s Counsel on or before August 9, 2021 or they will not be considered. *See* Section III.B below.**

Right to Exclude Yourself from the Settlement Class for Either or Both of the Settlements. The Court will exclude you from the Settlement Class if you make a written request for exclusion from either or both of the Settlements that is postmarked to the Settlement Administrator (A.B. Data, Ltd.) at the address set forth in Section VIII no later than **August 9, 2021**. *See* Section III.C. **To be valid, the request for exclusion must comply with the requirements set forth in the Court’s Order dated December 16, 2020 (the “Preliminary Approval Order”) and summarized in Section III.C below.** If you exclude yourself from the Settlement Class, you will not be entitled to share in the Net Settlement Funds.

I. BACKGROUND OF THE LITIGATION

A. The Nature of the Litigation

Plaintiffs allege that each Defendant,⁵ from January 1, 2006 through April 19, 2017, inclusive, conspired to fix the prices for Mexican Government Bonds issued by the Mexican government through the Bank of Mexico (“Banxico”). Plaintiffs allege that each

³ Capitalized terms, not otherwise defined herein, shall have the same meanings assigned to them in the Settlement Agreements, as applicable.

⁴ The Settlement Agreements are not settlements with any other Defendant and thus are not dispositive of any of Plaintiffs’ claims against the remaining Defendants.

⁵ “Defendants” are Banco Bilbao Vizcaya Argentaria, S.A., BBVA Securities, Inc., BBVA Compass Bancshares, Inc., BBVA Bancomer S.A., Institución de Banca Múltiple, Grupo Financiero BBVA Bancomer, Grupo Financiero BBVA Bancomer, S.A. de C.V., Banco Santander S.A., Santander Investment Securities, Inc., Santander Holdings USA, Inc., Banco Santander (Mexico) S.A. Institución de Banca Múltiple, Grupo Financiero Santander Mexico, Santander Investment Bolsa, Sociedad de Valores, S.A.U., Bank of America N.A., Bank of America Corporation, BankAmerica International Financial Corporation, Bank of America Mexico, S.A., Institución de Banca Múltiple, Grupo Financiero Bank of America, Merrill Lynch, Pierce, Fenner & Smith Incorporated, Citigroup Inc., Barclays Bank Mexico, S.A., Barclays Bank PLC, Barclays Capital Securities Limited, Grupo Financiero Barclays Mexico, S.A.

Defendant transacted in price-fixed MGBs at artificial prices with market participants like Plaintiffs and the Class. Plaintiffs' lawsuit contends that Defendants fixed MGB prices through several interrelated means.

First, Defendants allegedly rigged MGB primary market auctions through collusive bidding and information sharing to control the flow of MGB supply. As the sole authorized market makers for MGBs, Defendants agree to participate in the government run- primary market auctions for newly issued MGBs and to make MGBs available for purchase and sale to investors in the secondary market. Plaintiffs allege that Defendants shared the prices at which they planned to submit fixed bids in MGB primary market auctions, against explicit Banxico rules requiring that bids be confidential. Plaintiffs contend that Defendants' bid-rigging allowed them to buy large volumes of MGBs at artificially low prices, increasing Defendants' ability to dominate the MGB market and impose artificial prices.

Second, Defendants allegedly sold newly issued MGBs purchased at auction into the secondary market at artificially high, price-fixed terms. Plaintiffs allege that Defendants controlled a significant market share of MGBs through their illegal bid-rigging and through privileges associated with their market maker status. Defendants allegedly manipulated the MGB market by communicating prices, pooling information about expected customer flows, and exchanging other confidential bank information through interbank chatrooms, telephone calls, and in-person meetings. Plaintiffs claim that Defendants' conspiracy caused Plaintiffs and the Class to pay higher prices for newly issued MGBs sold into the secondary market than they otherwise would have.

Third, Defendants allegedly agreed to fix the "bid-ask spread" artificially wider when offering to buy or sell MGBs in secondary market trading with Plaintiffs and the Class. Plaintiffs allege that Defendants fixed bid-ask spreads by communicating prices, expected customer flows, and sensitive bank information through interbank chatrooms, telephone calls, and in-person meetings. Plaintiffs claim that the result of Defendants' alleged conspiracy was that investors were underpaid by Defendants' suppression of the "bid price," the price at which Defendants offered to buy MGBs from investors, and overcharged by Defendants' inflation of the "ask price," the price at which Defendants offered to sell MGBs to investors.

Plaintiffs have asserted legal claims under federal antitrust law and common law.

Plaintiffs and Plaintiffs' Lead Counsel believe that Settlement Class Members have been damaged by Defendants' alleged conduct. Barclays and JPMorgan do not agree with the allegations made by Plaintiffs, believe that they have meritorious defenses to Plaintiffs' allegations, and believe that Plaintiffs' claims would have been rejected prior to trial, at trial (had Plaintiffs successfully certified a class and survived summary judgment motions), or on appeal. As a result, Settling Defendants believe Settlement Class Members would have received nothing if the litigation had continued to trial.

The Court has not decided in favor of Plaintiffs, Barclays or JPMorgan. Instead, Plaintiffs' Lead Counsel engaged in separate negotiations with Barclays and JPMorgan to reach negotiated resolutions of the claims against Settling Defendants in this Action. The Settlements allow Plaintiffs, Barclays and JPMorgan to avoid the risks and costs of lengthy litigation and the uncertainty of pre-trial proceedings, a trial, and appeals. If approved, the Settlements would permit eligible Settlement Class Members who file timely and valid Claim Forms, to receive some compensation, rather than risk ultimately receiving nothing. Plaintiffs and Plaintiffs' Lead Counsel believe the Settlements are in the best interest of all Settlement Class Members.

Barclays has agreed to pay a total of \$5.7 million and JPMorgan has agreed to pay a total of \$15 million (the "Settlement Funds") in cash for the benefit of the proposed Settlement Class. If the Settlements are approved, the Settlement Funds, plus interest earned from the date it was established, less any Taxes, any Notice and Administration Costs, any Court-awarded attorneys' fees, litigation costs and expenses, and service awards for Plaintiffs, and any other costs or fees approved by the Court (the "Net Settlement Fund"), will be divided among all Settlement Class Members who file valid Claim Forms.

If the Settlements are approved, the Action will conclude against the Settling Defendants. If the Settlements are not approved, Settling Defendants will remain as defendants in the Action, and Plaintiffs will continue to pursue their claims against Settling Defendants.

B. Procedural History

On March 30, 2018, Plaintiffs Oklahoma Firefighters Pension & Retirement System and Electrical Workers Pension Fund Local 103, I.B.E.W. filed the first class action complaint in this Action against the Settling Defendants and other defendants. ECF No. 1.⁶ On April 25, 2018, the Court issued a stay of discovery pending resolution of Defendants' anticipated motions to dismiss. ECF No.

de C.V., Barclays plc, Barclays Capital Inc., Institución de Banca Múltiple, Grupo Financiero Barclays México, Citigroup Global Markets Inc., Citigroup Financial Products Inc., Citigroup Global Markets Holdings Inc., Banco Nacional de México, S.A., Institución de Banca Múltiple, Grupo Financiero Banamex, S.A. de C.V., Credit Suisse Group AG, Credit Suisse AG, Grupo Financiero Credit Suisse (Mexico), S.A. de C.V., Banco Credit Suisse (Mexico), S.A., Deutsche Bank AG, Deutsche Bank Securities Inc., Deutsche Bank Americas Holding Corp., Deutsche Bank México, S.A. Institución de Banca Múltiple, HSBC Holdings plc, HSBC Bank plc, HSBC Securities (USA) Inc., HSBC Markets (USA) Inc., HSBC México, S.A., Institución de Banca Múltiple, Grupo Financiero HSBC, HSBC North America Holdings Inc., HSBC Latin America Holdings (UK) Limited, ING Groep N.V., ING Bank, N.V., and ING Financial Markets LLC, JPMorgan Chase & Co., J.P. Morgan Broker-Dealer Holdings Inc., J.P. Morgan Securities LLC, JPMorgan Chase Bank, National Association, Banco J.P. Morgan, S.A. Institución de Banca Múltiple, J.P. Morgan Grupo Financiero, and J.P. Morgan Securities plc.

⁶ Unless otherwise noted, all docket citations are to *In re Mexican Government Bonds*, 18-cv-02830 (JPO) (S.D.N.Y.).

11. Five additional class action complaints relating to the same facts and circumstances of this Action were filed in May 2018 against Settling Defendants and other defendants. On June 18, 2018, the Court granted an order consolidating the six related class action complaints and appointing Lowey Dannenberg, P.C. as interim class counsel. ECF No. 49. Thereafter, on July 18, 2018, Plaintiffs filed a first amended consolidated class action complaint, adding Plaintiffs Manhattan and Bronx Surface Transit Operating Authority Pension Plan, Metropolitan Transportation Authority Defined Benefit Pension Plan Master Trust, Boston Retirement System, Southeastern Pennsylvania Transportation Authority Pension Plan, United Food and Commercial Workers Union and Participating Food Industry Employers Tri-State Pension Fund, and Government Employees' Retirement System of the Virgin Islands. ECF No. 75.

Defendants filed their motions to dismiss and two separate memoranda of law on September 17, 2018. ECF Nos. 113-44. Plaintiffs filed their opposition to Defendants' motions to dismiss on November 16, 2018. ECF Nos. 145-46. Defendants filed their joint reply memoranda on December 20, 2018. ECF Nos. 150-51.

On September 30, 2019, the Court granted Defendants' motion to dismiss Plaintiffs' Amended Consolidated Class Action Complaint for failure to state a claim and directed Plaintiffs to file a letter seeking leave to file a Second Consolidated Amended Complaint within twenty-one days. ECF No. 158. Plaintiffs submitted a letter motion seeking leave to file a Proposed Second Amended Class Action Complaint on October 21, 2019. ECF No. 159. Defendants filed a letter in response to Plaintiffs' motion on October 23, 2019. ECF No. 161. On October 25, 2019, the Court granted Plaintiffs' letter motion. ECF No. 162. On December 9, 2019, Plaintiffs filed a Second Amended Consolidated Class Action Complaint ("SAC"). ECF No. 163. Defendants filed their motion to dismiss the SAC on February 21, 2020. ECF Nos. 176, 178-91. Plaintiffs filed their opposition to Defendants' motion to dismiss the SAC on April 21, 2020. ECF Nos. 199, 201, 203.

C. The Definition of the Settlement Class

In the Preliminary Approval Order, the Court preliminarily approved the following Settlement Class, defined as:

All Persons that entered into a Mexican Government Bond Transaction at any time between at least January 1, 2006, and April 19, 2017, where such persons were either domiciled in the United States or its territories or, if domiciled outside the United States or its territories, transacted in the United States or its territories, provided that if, prior to moving for Final Approval of the Settlement, Plaintiffs expand the Class in any subsequent amended complaint, class motion or in any other stipulation or settlement agreement Plaintiffs reach with any other Defendant involving this Action, the defined Class in this Settlement Agreement shall be expanded so as to be coterminous with such expansion. Excluded from the Class are Defendants and their employees, agents, affiliates, parents, subsidiaries and co-conspirators, whether or not named in the Complaint in this Action, and the United States and Mexican governments; provided, however, that Investment Vehicles shall not be excluded from the definition of "Class" or "Settlement Class" solely on the basis of being deemed to be Defendants or affiliates or subsidiaries of Defendants.

Notwithstanding the sentence above that "[e]xcluded from the Class are the Defendants and their employees, agents, affiliates, parents, subsidiaries, and co-conspirators, whether or not named in the Complaint in this Action, and the United States and Mexican governments," and solely for purposes of this Settlement and this Settlement Class, Investment Vehicles shall not be excluded from the Settlement Class solely on the basis of being deemed to be Defendants or affiliates or subsidiaries of Defendants; provided, however, that under no circumstances may a Defendant (or any of its direct or indirect parents, subsidiaries, affiliates, or divisions) receive a distribution from the Settlement Fund through an Investment Vehicle.

If you are not sure whether you are included in the Class, you can ask for free help. You can call toll-free 1-877-829-2941 (if calling from outside the United States or Canada, call 1-414-961-6592) or visit www.MGBAntitrustSettlement.com for more information.

II. SUMMARY OF THE PROPOSED SETTLEMENT

A. Settlements with Barclays and JPMorgan

On behalf of the Settlement Class, Plaintiffs entered into the Settlement Agreement with Barclays on March 27, 2020 and entered into the Settlement Agreement with JPMorgan on March 27, 2020. The following description of the proposed Settlements is only a summary. This description and this Notice are qualified in their entirety by the Settlement Agreements which are on file with the Court at the address indicated in this Notice and are available at the official website for the Settlements, at www.MGBAntitrustSettlement.com (the "Settlement Website"). In the event of any conflict between the Settlement Agreements and this Notice, the terms of the Settlement Agreements shall control.

1. Barclays' and JPMorgan's Payments for the Benefit of the Settlement Class

a. No Right to Reversion

The Settlement Agreements do not provide Barclays or JPMorgan with a right of reversion. That is, no matter how many Settlement Class Members fail to file a Claim Form or choose to opt-out, if the Settlements are not terminated and are finally approved by the Court, none of the Settlement monies will revert to Barclays or JPMorgan. This is not a claims-made settlement; there will be no reversion.

b. Barclays' and JPMorgan's Potential Right To Termination

Sections 21 and 23 of the Settlement Agreements describe Barclays' and JPMorgan's right to terminate if certain events occur. With respect to each such event, Barclays and JPMorgan each has the right (as qualified in their respective Settlement Agreement), but not the obligation, to determine to exercise, in its sole discretion, its right to terminate if the event occurs.

c. Distribution Plan

The Distribution Plan is available for review on the Settlement Website at www.MGBAntitrustSettlement.com. Changes, if any, to the Distribution Plan based on newly available data or information will be promptly posted on the Settlement Website. Please see the Settlement Website for the most up-to-date information about the Distribution Plan. Members of the Settlement Class are strongly encouraged to review the Settlement Website for any changes to the Distribution Plan.

d. Changes or Further Orders by the Court

Any change by the Court of the Distribution Plan, the time and place of the Fairness Hearing, or any other matter and all further orders or requirements by the Court will be posted on the Settlement Website at www.MGBAntitrustSettlement.com as soon as practicable.

It is important that you refer to the Settlement Website as no other notice may be published of such changes.

2. The Release and Covenant Not to Sue under the Settlement Agreements

IF YOU HAVE NOT VALIDLY REQUESTED TO BE EXCLUDED FROM THE SETTLEMENT CLASS, WHEN THE SETTLEMENTS BECOME FINAL YOU WILL BE RELEASING THE CLAIMS DESCRIBED BELOW, AND YOU WILL BE BOUND BY THE RELEASES IN THE SETTLEMENT AGREEMENTS INCLUDING THE COVENANT NOT TO SUE—EVEN IF YOU DO NOT FILE A PROOF OF CLAIM AND RELEASE.

Unless you exclude yourself, you remain a Settlement Class Member. That means you can't sue, continue to sue, or be part of any other lawsuit about the Released Claims in this Action against Settling Defendants or any of the Released Parties. Upon the Effective Date, the Releasing Parties shall release and be deemed to release and forever discharge and shall be forever enjoined from prosecuting the Released Claims against the Released Parties, regardless of whether such Releasing Party executes and delivers a Claim Form.

The capitalized terms used in this paragraph are defined in the Settlement Agreements, Preliminary Approval Order, or this Notice. For easy reference, certain of these terms are copied below:

- "Released Parties" means Settling Defendants and each of their respective past and present direct and indirect corporate parents (including holding companies), subsidiaries, related entities, affiliates, associates (all as defined in SEC Rule 12b-2 promulgated pursuant to the Securities Exchange Act of 1934), divisions, joint ventures, predecessors, and successors, and each of their respective past or present officers, directors, partners, members, managers, managing directors, employees, agents, contractors, attorneys, legal or other representatives, trustees, trusts, heirs, beneficiaries, estates, executors, administrators, insurers, shareholders, advisors, and assigns of each of the foregoing.

- "Releasing Parties" means, individually and collectively, Plaintiffs and each Settling Class Member, on behalf of themselves and any of their respective predecessors, successors and assigns, direct and indirect parents, subsidiaries and affiliates, and on behalf of their respective past or present officers, directors, stockholders, agents, employees, legal representatives, partners, principals, members, participants, associates, trustees, beneficiaries, parents, subsidiaries, divisions, affiliates, and the heirs, executors, administrators, purchasers, predecessors, successors, and assigns of each of the foregoing, whether or not they object to the Settlement and whether or not they make a claim for payment from the Net Settlement Fund.

- "Released Claims" means any and all manner of claims, rights, demands, obligations, damages, actions or causes of action, cross-claims, counterclaims, judgments, suits, obligations, debts, setoffs, rights of recovery, charges or liabilities of any kind whatsoever (however denominated), of every nature and description, whether known or unknown, suspected or unsuspected, asserted or unasserted, whether class, derivative or individual, whether fixed or contingent, in law or in equity, whether arising under federal, state, common, statutory or foreign law or regulation (including FED. R. CIV. P. 11), whether directly, representatively, derivatively, or in any other capacity, which any member of the Settlement Class ever had, now have, or hereafter can, shall, or may have that arise out of or relate in any way to the acts, facts, statements, or omissions that were or could have been alleged or asserted by Plaintiffs or any member of the Settlement Class in the Action, including, but not limited to, any claims arising from or related to (a) any purported conspiracy, collusion, racketeering activity, or other improper conduct related to Mexican Government Bonds or Mexican Government Bond Transactions, (b) any alleged manipulation of the prices of Mexican Government Bonds or Mexican Government Bond Transactions, or (c) the sharing or exchange of customer information or confidential information, including, but not limited to, customer identity, trading patterns, net positions, or orders with respect to Mexican Government Bonds or Mexican Government Bond Transactions. For the avoidance of doubt, Released Claims do not include claims relating to enforcement of the Settlement

and do not include claims arising under foreign law based solely on transactions executed entirely outside of the United States by members of the Settlement Class domiciled outside the United States.

You are automatically a member of a Settlement Class if you fit the Settlement Class description. However, if you do not submit a timely and valid Claim Form, you will not receive any payment from the Settlements. You will be bound by past and any future Court rulings, including rulings on the Settlements and Released Claims. Unless you exclude yourself, you will not be able to start a lawsuit, continue with a lawsuit, or be a part of any other lawsuit against Settling Defendants or any of the other Released Parties on the basis of the Released Claims.

The Settlement Agreements do not settle or compromise any claims other than those set out therein. All rights of the Plaintiffs or any Settlement Class Member against any person or entity other than the parties released in the Settlement Agreements are specifically reserved by the Plaintiffs and the Class Members.

III. YOUR OPTIONS

A. Claim Form for the Settlement Agreements

To participate in and receive your share of the Net Settlement Funds, you must submit a valid and timely Claim Form demonstrating that you are an Authorized Claimant as set forth in the Settlement Agreements. You may obtain and submit a Claim Form on the Settlement Website at www.MGBAntitrustSettlement.com no later than October 13, 2021. Claim Forms, if sent by mail, must be addressed to the Settlement Administrator (*see* address in Section VIII below) and postmarked no later than October 13, 2021. A copy of the Claim Form is attached hereto.

Any Settlement Class Member who fails to submit a Claim Form by October 13, 2021 in the manner specified, will be barred from receiving any payment from the Net Settlement Funds (unless, by Order of the Court, an untimely Claim Form submitted by such member of the Settlement Class is approved), but will in all other respects be bound by the terms of the Settlement Agreements and by the Final Judgment(s) entered on the Settlement Class' claims.

B. Object to the Settlements

If you are a Settlement Class Member and you do not exclude yourself, you can tell the Court what you think about the Settlements. You can object to all or any part of the Settlements, Distribution Plan, and/or application for attorneys' fees, reimbursement of litigation costs and expenses, and any service awards for Plaintiffs. You can give reasons why you think the Court should approve them or not. The Court will consider your views. You may also ask to intervene in the Action.

If you want to make an objection or intervene in the Action, you may enter an appearance in the Action, at your own expense, individually or through counsel of your own choice, by filing with the Clerk of Court a notice of appearance and your objection, and serving copies of your objection on Plaintiffs' Lead Counsel, Barclays' Counsel, and JPMorgan's Counsel by **August 9, 2021** to the following mailing addresses:

Vincent Briganti LOWEY DANNENBERG, P.C. 44 S. Broadway, Suite 1100 White Plains, NY 10601-2310	Jeffrey T. Scott SULLIVAN & CROMWELL LLP 125 Broad Street New York, NY 10004	Robert D. Wick COVINGTON & BURLING LLP The New York Times Building 620 Eighth Ave., New York, NY 10018
<i>Plaintiffs' Lead Counsel</i>	<i>Counsel for Barclays</i>	<i>Counsel for JPMorgan</i>

Any Settlement Class Member who does not enter an appearance and does not object will be represented by Plaintiffs' Lead Counsel.

If you choose to object, you must file a written objection with the Clerk of the Court. You cannot file an objection by telephone or email. Your written objection must include a statement of the objection or motion to intervene, as well as the specific legal and factual reasons for each objection or motion to intervene, including all support that the objecting Settlement Class Member or the governmental entity wishes to bring to the Court's attention and all evidence the objecting member of the Settlement Class or governmental entity wishes to introduce in support of his, her, or its objection or motion. The submission must contain: (i) a heading that refers to this Action by case name and case number (*In re Mexican Government Bonds Antitrust Litigation*, No. 18-cv-02830 (JPO) (S.D.N.Y.)); (ii) a statement of the specific legal and factual basis for each objection or intervention argument, including whether the objection applies only to the objecting person, a specific subset of the Class or the entire Class; (iii) a statement of whether the objecting or intervening person or entity intends to appear at the Fairness Hearing, either in person or through counsel and, if through counsel, a statement identifying that counsel by name, address, and telephone number; (iv) a description of any and all evidence the objecting person or entity may offer at the Fairness Hearing, including but not limited to the names, addresses, and expected testimony of any witnesses; all exhibits intended to be introduced at the Fairness Hearing; and documentary proof of the objecting person's membership in the

Settlement Class; (v) a description of the Mexican Government Bond Transactions entered into by the member of the Settlement Class that fall within the Settlement Class definition (including, for each transaction, the identity of the broker, the date of the transaction, the type of the transaction, the counterparty (if any), any transaction identification numbers, the rate, and the notional amount of the transaction); and (vi) a list of other cases in which the objector or intervenor or counsel for the objector or intervenor has appeared either as an objector or counsel for an objector in the last five years. Persons who have timely submitted a valid Request for Exclusion are not members of the Settlement Class and are not entitled to object. All written objections must be signed by the Settlement Class Member (or his, her, or its legally authorized representative), even if the Settlement Class Member is represented by counsel).

If you do not timely and validly submit your objection, your views will not be considered by the Court or any court on appeal. Check the Settlement Website at www.MGBAntitrustSettlement.com for updates on important dates and deadlines relating to all settlements.

C. Request to be Excluded from the Settlement Class for the Settlement Agreements

You can exclude yourself by sending a written "Request for Exclusion." You cannot exclude yourself by telephone or email. Your written Request for Exclusion must contain: (a) the name, address, and telephone number of the Settlement Class Member; (b) a list of all trade names or business names that the Settlement Class Member requests to be excluded; (c) the name of this Action (*In re Mexican Government Bonds Antitrust Litigation*, No. 18-cv-02830 (JPO) (S.D.N.Y.)); (d) a statement certifying such person is a member of the Settlement Class; (e) a description of the Mexican Government Bonds Transactions entered into by the member of the Settlement Class that fall within the Settlement Class definition (including, for each transaction, the identity of the broker, the date of the transaction, the type of the transaction, the counterparty (if any), any transaction identification numbers, the rate, and the notional amount of the transaction); (f) a statement that "I/we hereby request that I/we be excluded from the Settlement Class"; and (g) a statement specifying whether such person is requesting exclusion from the Settlement Class as it relates to the Barclays Settlement or JPMorgan Settlement or both.

A Request for Exclusion that does not include all of the foregoing information, that does not contain the proper signature, that is sent to an address other than the one designated above, or that is not sent within the time specified shall be invalid and the person(s) filing such an invalid request shall be a Settlement Class Member and shall be bound by the Settlements, if approved.

Requests for exclusion from the Settlement Class for the Settlement Agreements must be sent by U.S. first class mail (preferably certified mail) (or, if sent from outside the U.S., by a service that provides for guaranteed delivery within five (5) or fewer calendar days of mailing) to the Settlement Administrator at:

Mexican Government Bonds Antitrust Settlement
Exclusions
c/o A.B. Data, Ltd.
P.O. Box 173001
Milwaukee, WI 53217

Requests for Exclusion must be postmarked no later than **August 9, 2021**.

If you submit a valid and timely Request for Exclusion in the manner set forth above, you will not be bound by the Settlement Agreements and can independently pursue claims you may have against the Settling Defendants at your own expense. You may also enter an appearance through an attorney if you so desire. However, if you exclude yourself from the Settlement Agreements, you will not be eligible to share in the Net Settlement Funds and shall have no rights under the Settlements. In addition, if you exclude yourself from the Settlement Class, you will not be entitled to object to the Settlements or to appear at the Fairness Hearing.

IV. PROOF OF CLAIM AND RELEASE

The Claim Form, which includes instructions on how and when to make a claim, is included with this Notice. You may also obtain a Claim Form or complete the online Claim Form on the Settlement Website at www.MGBAntitrustSettlement.com or you may request that a Claim Form be mailed to you by calling the Settlement Administrator toll free at 1-877-829-2941. You should consider reading the Settlement Agreements and you should read the Claim Form carefully before submitting your Claim Form or determining another course of action.

V. ATTORNEYS' FEES AND COSTS

Settlement Class Members are not personally responsible for payment of attorneys' fees or expenses. As compensation for their time and their risk in prosecuting the litigation on a wholly contingent fee basis for approximately two years, Plaintiffs' Lead Counsel will ask the Court for an award of attorneys' fees in the amount of no more than 30% or six million two hundred ten thousand dollars (\$6,210,000) of the Settlement Funds, as a common fund; and an award for unreimbursed litigation costs and expenses in the amount of no more than six hundred thousand dollars (\$600,000), all to be deducted from the Settlement Funds. Additionally, Plaintiffs' Lead Counsel may apply at the time of any application for distribution to qualifying members of the Settlement Class, for an award from the Settlement Funds of attorneys' fees for services performed and reimbursement of expenses incurred in connection with the administration of the Settlement Agreements after the date of the Fairness Hearing.

VI. FAIRNESS HEARING AND RIGHT TO OBJECT

The Court has scheduled a Fairness Hearing for **September 13, 2021 at 3:00 P.M.** to be held at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York, Courtroom 706. At the Fairness Hearing, the Court will determine, among other things, if the proposed Settlements are fair, reasonable, and adequate. The Court will also consider Plaintiffs' Lead Counsel's request for attorneys' fees and reimbursement of litigation expenses.

The time and date of the Fairness Hearing may be continued from time to time without further notice and you are advised to confirm the time and location if you wish to attend; as soon as practicable after any change in the scheduled date and time, such change will be posted on the Settlement Website.

If you are a Settlement Class Member, you are entitled to appear, in person or through duly authorized attorneys, and to show cause why the Settlement or other applications should or should not be approved. However, if you wish to appear, you must submit a written statement, along with any materials you wish the Court to consider—see Section III.B above. This written statement must be received by the Court (at the address provided above) no later than **August 9, 2021** or it will not be considered. Such materials must also be served on Plaintiffs' Lead Counsel and counsel of record for the Settling Defendants at the addresses set forth in Section III.B. by overnight mail or by hand or they will not be considered.

VII. CHANGE OF ADDRESS

If this Notice reached you at an address other than the one on the mailing label, or if your address changes, please enter your current information online at www.MGBAntitrustSettlement.com, or send it to the Settlement Administrator at the address set forth in Section VIII below.

VIII. THE SETTLEMENT ADMINISTRATOR

The Court has appointed A.B. Data, Ltd. as the Settlement Administrator. Among other things, the Settlement Administrator is responsible for providing notice of the Settlements to the Settlement Class and processing Claim Forms. You may contact the Settlement Administrator through the Settlement Website, by telephone toll free at 1-877-829-2941, or by writing to the Settlement Administrator at the below address:

Mexican Government Bonds Antitrust Settlement
c/o A.B. Data, Ltd.
P.O. Box 173123
Milwaukee, WI 53217

IX. ADDITIONAL INFORMATION

The Settlement Agreements and other important documents related to these Actions are available online at www.MGBAntitrustSettlement.com and also available for review during normal business hours at the office of the Clerk of Court, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007-1312. If you have questions about this Notice, the procedure for registering, or the Settlement Agreements, you may contact Plaintiffs' Lead Counsel at the address listed in Section III.B.

DO NOT CONTACT THE DISTRICT COURT OR THE CLERK'S OFFICE REGARDING THIS NOTICE.

Dated: April 21, 2021

BY ORDER OF THE COURT.
Clerk of the United States District Court
Southern District of New York

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE MEXICAN GOVERNMENT BONDS
ANTITRUST LITIGATION

Master Docket No. 18-cv-02830

PROOF OF CLAIM AND RELEASE

I. INSTRUCTIONS

1. If you entered into a Mexican Government Bond Transaction from January 1, 2006 through and including April 19, 2017 (“Class Period”), you may be eligible to receive a payment from the \$20.7 million in settlements with Barclays PLC, Barclays Bank PLC, Barclays Capital Inc., Barclays Capital Securities Limited, Barclays Bank México, S.A., Institución de Banca Múltiple, Grupo Financiero Barclays México, and Grupo Financiero Barclays México, S.A. de C.V. (collectively “Barclays”) and JPMorgan Chase & Co., J.P. Morgan Broker-Dealer Holdings Inc., J.P. Morgan Securities LLC, JPMorgan Chase Bank, National Association, Banco J.P. Morgan, S.A. Institución de Banca Múltiple, J.P. Morgan Grupo Financiero, and J.P. Morgan Securities plc (collectively “JPMorgan” and with Barclays, the “Settling Defendants”) reached in *In re Mexican Government Bonds Antitrust Litigation*, No. 18-cv-02830 (JPO) (S.D.N.Y).

2. “Mexican Government Bond Transaction” means any purchase, sale, or exchange of Mexican Government Bonds, whether in the primary, secondary, or any other market. “Mexican Government Bonds” means any debt securities issued by the United Mexican States (“Mexico”) that are Mexican Peso-denominated, including, but not limited to, CETES, Bondes D, UDIBONOS, and BONOS.

3. Unless otherwise defined herein, all capitalized terms contained in this proof of claim and release (“Claim Form”) have the same meaning as defined in the accompanying Notice of Proposed Class Action Settlements, September 13, 2021 Fairness Hearing Thereon and Class Members’ Rights (“Notice”), the Stipulation and Agreement of Settlement with Barclays, and the Stipulation and Agreement of Settlement with JPMorgan (“Settlement Agreements”), which are available at www.MGBAntitrustSettlement.com.

4. It is important that you read the Notice that accompanies this Claim Form. By signing and submitting this Claim Form, you will be certifying that you have read the Notice, including the terms of the Release and Covenant Not to Sue described in the Notice and provided for in the Settlement Agreements.

5. To be eligible to receive a payment from the Net Settlement Fund, you must submit a Claim Form along with the required data and/or information described in Parts III and IV below. **To be considered timely, your Claim Form must be submitted online at www.MGBAntitrustSettlement.com by 11:59 p.m. Eastern Time on October 13, 2021 OR mailed and postmarked no later than October 13, 2021.** If you are unable to submit the required data as described below at Parts III and IV, you should call the Settlement Administrator for further instructions.

6. As described in Part III below, you may be required to submit additional information about the Mexican Government Bond Transactions that you submit as part of your Claim Form, but only if you are contacted and instructed to do so by the Settlement Administrator.

7. Your payment amount will be determined based on the Settlement Administrator’s review of your Claim Form and calculated pursuant to the Distribution Plan that the Court approves. Submission of a Claim Form does not guarantee that you will receive a payment from the Settlements. For more information, please refer to the Notice and Distribution Plan available at www.MGBAntitrustSettlement.com.

8. Separate Claim Forms should be submitted for each separate legal entity. Conversely, a single Claim Form should be submitted on behalf of only one legal entity.

9. If you have questions about submitting a Claim Form or need additional copies of the Claim Form or the Notice, you may contact the Settlement Administrator.

III. REQUIREMENTS FOR CLAIM SUBMISSION

1. YOU MUST SUBMIT YOUR CLAIM FORM ELECTRONICALLY OR ON PAPER IN THE REQUIRED FORMAT

Claimants must electronically submit their Claim Forms online at www.MGBAntitrustSettlement.com by **11:59 p.m. Eastern Time on October 13, 2021, OR** mail the Claim Forms **postmarked no later than October 13, 2021**, to the Settlement Administrator at P.O. Box 173123, Milwaukee, WI 53217. Claim Submission Instructions, including the information you must provide about your Mexican Government Bond Transactions, are available at www.MGBAntitrustSettlement.com. Claim Forms must be submitted in the format specified by the Claim Submission Instructions.

Along with your Claim Form, you may be later required to submit the details of your Mexican Government Bond Transactions reflected in the Summary Notional Table in Part IV, below.

2. YOU DO NOT NEED TO SUBMIT ANY ADDITIONAL DATA OR DOCUMENTATION OF TRANSACTIONS AT THIS TIME BUT MUST DO SO IF CONTACTED BY THE SETTLEMENT ADMINISTRATOR.

The Settlement Administrator may request that Claimants submit additional data or documentation of their Mexican Government Bond Transactions. A Mexican Government Bond Transaction Data Template, including the information you must provide about your Mexican Government Bond Transactions, if requested, is available at www.MGBAntitrustSettlement.com.

If supplemental documentation is required, it would be from one or more of the following sources, so you should retain any such records in case you need to submit them to the Settlement Administrator in the future:

- a. Transaction data from your bank, broker, or internal trade system;
- b. Bank confirmations by individual trade;
- c. Bank transaction reports or statements;
- d. Trading venue transaction reports or statements;
- e. Prime broker reports or statements;
- f. Custodian reports or statements;
- g. Daily or monthly account statements or position reports;
- h. Email confirmations from counterparty evidencing transactions;
- i. Bloomberg confirmations or communications evidencing transactions; and/or
- j. Other documents evidencing Mexican Government Bond Transactions during the Class Period.

Further information about these requirements is included in the Claim Submission Instructions, which are available at www.MGBAntitrustSettlement.com.

IV. SUMMARY NOTIONAL TABLE OF MEXICAN GOVERNMENT BOND TRANSACTIONS

Complete this Part IV if and only if you entered into Mexican Government Bond Transactions from January 1, 2006, through and including April 19, 2017. Do not include information regarding instruments other than Mexican Government Bond Transactions and do not include Mexican Government Bond Transactions in which you acquired the bonds as an agent for another individual or entity.

TRADE DURATION (MATURITY DATE LESS TRADE DATE)	TRANSACTIONS WITH DEFENDANTS		TRANSACTIONS WITH NON-DEFENDANTS	
	<u>TOTAL NOTIONAL PURCHASED (PESO)</u>	<u>TOTAL NOTIONAL SOLD (PESO)</u>	<u>TOTAL NOTIONAL PURCHASED (PESO)</u>	<u>TOTAL NOTIONAL SOLD (PESO)</u>
0-1 YEARS				
1-2 YEARS				
2-3 YEARS				
3-4 YEARS				
4-5 YEARS				
5-6 YEARS				
6-7 YEARS				
7-8 YEARS				
8-9 YEARS				
9-10 YEARS				
10-11 YEARS				
11-12 YEARS				
12-13 YEARS				
13-14 YEARS				
14-15 YEARS				
15-16 YEARS				
16-17 YEARS				
17-18 YEARS				
18-19 YEARS				
19-20 YEARS				
20-21 YEARS				
21-22 YEARS				

	<u>TRANSACTIONS WITH DEFENDANTS</u>		<u>TRANSACTIONS WITH NON-DEFENDANTS</u>	
<u>TRADE DURATION (MATURITY DATE LESS TRADE DATE)</u>	<u>TOTAL NOTIONAL PURCHASED (PESO)</u>	<u>TOTAL NOTIONAL SOLD (PESO)</u>	<u>TOTAL NOTIONAL PURCHASED (PESO)</u>	<u>TOTAL NOTIONAL SOLD (PESO)</u>
22-23 YEARS				
23-24 YEARS				
24-25 YEARS				
25-26 YEARS				
26-27 YEARS				
27-28 YEARS				
28-29 YEARS				
29-30 YEARS				
> 30 YEARS				

This Form Must Be Electronically Submitted OR
Postmarked No Later than October 13, 2021.

V. CLAIMANT'S CERTIFICATION & SIGNATURE

SECTION A: CERTIFICATION

BY SIGNING AND SUBMITTING THIS CLAIM FORM, CLAIMANT OR CLAIMANT'S AUTHORIZED REPRESENTATIVE CERTIFIES ON CLAIMANT'S BEHALF AS FOLLOWS:

1. I (we) have read the Notice and Claim Form, including the descriptions of the Release and Covenant Not to Sue provided for in the Settlement Agreements;
2. I (we) am (are) a Settlement Class Member and am (are) not one of the individuals or entities excluded from the Settlement Class;
3. I (we) have not submitted a Request for Exclusion;
4. I (we) have made the transactions submitted with this Claim Form for myself (ourselves) and not as agents of another, and have not assigned my (our) Released Claims to another;
5. I (we) hereby warrant and represent that I (we) have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any matter released pursuant to the release or any other part or portion thereof;
6. I (we) have not submitted any other claim in this Action covering the same transactions and know of no other person having done so on his/her/its/their behalf;
7. I (we) hereby consent to the disclosure of, waive any protections provided by any applicable bank secrecy or data privacy laws (whether foreign or domestic), or any similar confidentiality protections with respect to, and instruct Settling Defendants or any authorized third party to disclose my (our) information and transaction data relating to my (our) trades for use in the claims administration process;
8. I (we) submit to the jurisdiction of the Court with respect to my (our) claim and for purposes of enforcing the releases set forth in any Final Judgment(s) that may be entered in the Action;
9. I (we) agree to furnish such additional information with respect to this Claim Form as the Settlement Administrator or the Court may require; and
10. I (we) acknowledge that I (we) will be bound by and subject to the terms of the Judgments that will be entered in the Action if the Settlements are approved.

SECTION B: SIGNATURE

PLEASE READ THE RELEASE, CONSENT TO DISCLOSURE, AND CERTIFICATION, AND SIGN BELOW.

I (we) acknowledge that, as of the Effective Date of the Settlements, pursuant to the terms set forth in the Settlement Agreements, and by operation of law and the Final Judgments, I (we) shall be deemed to release and forever discharge and shall be forever enjoined from prosecuting the Released Claims against the Released Parties (as defined in the Settlement Agreements and/or Final Judgment(s)).

By signing and submitting this Claim Form, I (we) consent to the disclosure of information relating to my (our) Mexican Government Bond Transactions during the Class Period, and waive any protections provided by any applicable bank secrecy or data privacy laws (whether foreign or domestic), or any similar confidentiality protections with respect to information and transaction data relating to my (our) trades, for use in the claims administration process.

If signing as an Authorized Representative on behalf of an entity, I (we) certify that I (we) have legal rights and authorization from the entity to file this Claim Form on the entity's behalf.

UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA, I (WE) CERTIFY THAT ALL THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE AND THAT THE DATA SUBMITTED IN CONNECTION WITH THIS CLAIM FORM ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.

Signature of Claimant (if Claimant is an individual filing on his or her own behalf)

Date: _____
MM/DD/YY

Print Name of Claimant (if Claimant is an individual filing on his or her own behalf)

Authorized Representative Completing Claim Form (if any)

Date: _____
MM/DD/YY

Print name of Authorized Representative Completing Claim Form (if any)

Capacity of Authorized Representative (if other than an individual (e.g., trustee, executor, administrator, custodian, or other nominee))

REMINDER: YOUR CLAIM FORM AND REQUIRED DATA MUST BE SUBMITTED ONLINE BY 11:59 P.M. EASTERN TIME ON OCTOBER 13, 2021 OR MAILED AND POSTMARKED NO LATER THAN OCTOBER 13, 2021.

Mexican Government Bonds Antitrust Settlement
c/o A.B. Data, Ltd.
P.O. Box 173123
Milwaukee, WI 53217

COURT-APPROVED NOTICE REGARDING
In re Mexican Government Bonds Antitrust Settlement