UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE MEXICAN GOVERNMENT BONDS ANTITRUST LITIGATION	Case No. 18-cv-02830

DECLARATION OF JACK EWASHKO ON BEHALF OF A.B. DATA, LTD. REGARDING NOTICE AND CLAIMS ADMINISTRATION FOR CLASS ACTION SETTLEMENT

Pursuant to 28 U.S.C. § 1746, I, Jack Ewashko, declare:

1) I am a Director of Case Management at A.B. Data, Ltd.'s Class Action Administration Division ("A.B. Data" or "Settlement Administrator"). I am over 21 years of age and am not a party to the above-captioned action. My business address is 600 A.B. Data Drive, Milwaukee, WI 53217, and my telephone number is 414-961-7555. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2) I submit this Declaration to provide the Court in the above-captioned class action litigation (the "Action") with information regarding the mailing of the Notice of Proposed Class Action Settlement, December 3, 2026 Fairness Hearing Thereon and Class Members' Rights (the "Mailed Notice"), publication of the Summary Notice of Proposed Class Action Settlement (the "Media Notice"), maintenance of the existing settlement website, and other administrative activities for the settlement with Banco Santander México, S.A., Institución de Banca Múltiple, Grupo Financiero Santander México (formerly known as Banco Santander (México), S.A., Institución de Banca Múltiple, Grupo Financiero Santander México) ("Santander Mexico"); BBVA México, S.A., Institución de Banca Múltiple, Grupo Financiero BBVA México (formerly known as BBVA Bancomer S.A., Institución de Banca Múltiple, Grupo Financiero BBVA Bancomer) ("BBVA México"); Banco Nacional de México, S.A., Institución de Banca Múltiple,

Grupo Financiero Banamex ("Citibanamex");[1] Deutsche Bank México, S.A., Institución de Banca Múltiple ("Deutsche Bank Mexico");[2] HSBC México, S.A., Institución De Banca Múltiple, Grupo Financiero HSBC ("HSBC Mexico"); and Bank of America México, S.A., Institución de Banca Múltiple ("Bank of America Mexico") (collectively, the "Settling Defendants").

DIRECT MAIL NOTICE

3) On or about January 31, 2021, A.B. Data received from Plaintiffs' Lead Counsel files containing both the names and addresses of the largest traders in Mexican Government Bonds,[3] comprising the most recent list of the top 75 holders of Mexican Government Bonds. A.B. Data electronically processed the data received to ensure adequate address formatting and eliminate duplicate names and addresses. The names and addresses were then loaded to a segregated database created for this Action (the "Notice Mailing Database").

4) A.B. Data maintains a database of the largest banks, brokerage houses, and clearing firms. The names and addresses of these banks, brokerage houses, and clearing firms were also loaded into the Notice Mailing Database and were updated for use with this Settlement.

5) On February 8, 2021, Plaintiffs' Lead Counsel forwarded A.B. Data an Excel file received from Barclays containing both the names and addresses of their Mexican Government Bond Transaction counterparties. A.B. Data electronically processed the data received to ensure

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[1] The parties understand and agree that the entity described in this litigation as "Banco Nacional de México, S.A., Institución de Banca Múltiple, Grupo Financiero Banamex" refers to Banco Nacional de Mexico, S.A., integrante del Grupo Financiero Banamex.

[2] Deutsche Bank Mexico came under the ownership of Grupo Financiero Citi México, S.A. de C.V. and Citi GSCP Inc., both of which are indirect, wholly owned subsidiaries of Citigroup Inc. Deutsche Bank Mexico was renamed Banco Citi México, S.A., Institución de Banca Múltiple, Grupo Financiero Citi México, which is now an indirect, wholly owned subsidiary of Citigroup Inc.

[3] All capitalized terms used, but not defined, shall have the same meanings as in the Stipulation and Agreement of Settlement dated August 12, 2026 (Doc. 382-1) (the "Settlement Agreement").

adequate address formatting and eliminate duplicate names and addresses. The names and addresses were then loaded into the Notice Mailing Database.

6) On March 31, 2021, Plaintiffs' Lead Counsel forwarded A.B. Data an Excel file received from JPMorgan containing both the names and addresses of their Mexican Government Bond Transaction counterparties. A.B. Data electronically processed the data received to ensure adequate address formatting and eliminate duplicate names and addresses. The names and addresses were then loaded into the Notice Mailing Database.

7) On May 21, 2021, Plaintiffs' Lead Counsel forwarded to A.B. Data an Excel file containing both the names and addresses of the Mexican Government Bond Transaction counterparties produced by a third party in response to a subpoena issued by Plaintiffs. A.B. Data electronically processed the data received to ensure adequate address formatting and to eliminate duplicate names and addresses. After formatting and deduplication, the names and addresses were then loaded into the Notice Mailing Database. In total, A.B. Data received the names and mailing addresses for 307 additional unique potential Settlement Class Members from this non-party.

8) From July 14, 2021 through July 16, 2021, Plaintiffs' Lead Counsel forwarded to A.B. Data Excel files containing both the names and addresses of Mexican Government Bond Transaction counterparties produced by third parties affiliated with Settling Defendants in response to subpoenas issued by Plaintiffs. A.B. Data electronically processed the data received to ensure adequate address formatting and to eliminate duplicate names and addresses. The names and addresses were then loaded into the Notice Mailing Database. In total, A.B. Data received the names and mailing addresses for 17,164 additional unique potential Settlement Class Members from these affiliated third parties.

9) A.B. Data also received an additional 3,118 unique names and addresses of potential Settlement Class Members from individuals or brokerage firms and other nominee holders. A.B. Data electronically processed the data as it was received to ensure adequate address formatting and to eliminate duplicate names and addresses. The names and addresses were then loaded into the Notice Mailing Database. A.B. Data has also received requests from brokers and other nominee holders for 245 Notice Packets to be forwarded by the nominees to their customers. All such requests have been, and will continue to be, complied with and addressed in a timely manner.

10) As per its usual process, and in light of the time that had passed since the Notice Mailing Database had been used in connection with the Barclays and JPMorgan Settlements, A.B. Data standardized and again updated the Notice Mailing Database addresses using the National Change of Address database prior to distributing the Mailed Notices. Beginning on September 18, 2026, A.B. Data mailed the Mailed Notice to potential Settlement Class Members and nominees in the Notice Mailing Database. In aggregate, 29,461 Mailed Notices were disseminated to potential Settlement Class Members by October 13, 2026. A true and accurate copy of the Mailed Notice is attached hereto as Exhibit A.

11) As of October 13, 2026, 172 Notice Packets were returned by the USPS to A.B. Data as undeliverable as addressed ("UAA"). Of those returned UAA, 74 had forwarding addresses and were promptly re-mailed to the updated address. Updated addresses could not be

located for the recipients of the remaining 98 Notice Packets. The Mailed Notice effort successfully reached more than 99% of Settlement Class Members.

MEDIA NOTICE

12) In accordance with Paragraph 14 of the Preliminary Approval Order[4], A.B. Data utilized paid and earned media to reach Settlement Class Members, including national financial newspapers, national financial magazines, national target financial websites, email notice through an email "blast," national sponsorship of selected financial newsletters, and earned media, including a news release.

13) On September 18, 2026, A.B. Data caused the Media Notice to be released via PR Newswire's US1 National Newswire. The US1 National Newswire reaches over 10,000 print and broadcast newsrooms and digital media websites in all 50 states and Puerto Rico. Releases on the US1 Newswire were also distributed to all the major news agencies such as AP, Bloomberg, Reuters, and Dow Jones. A copy of the proof of publication over PR Newswire is attached hereto as Exhibit B.

14) Beginning on September 18, 2026, A.B. Data caused the Media Notice to be placed in each of the following publications. A copy of the Media Notice is attached hereto as Exhibit C.

Publication	**Issue Date**
The Wall Street Journal (U.S. audience only)	September 18, 2026 and September 25, 2026
Investor's Business Daily	September 21, 2026 and September 28, 2026
Financial Times (U.S. audience only)	September 18, 2026 and September 25, 2026

[4] "Preliminary Approval Order" refers to the Order Preliminarily Approving the Proposed Settlement with Banco Santander México, S.A., Institución de Banca Múltiple, Grupo Financiero Santander México, BBVA México, S.A., Institución de Banca Múltiple, Grupo Financiero BBVA México, Banco Nacional de México, S.A., Institución de Banca Múltiple, Grupo Financiero BBVA Mexico, Banco Nacional de México, S.A., Institución de Banca Múltiple, Grupo Financiero Banamex, Deutsche Bank México, S.A., Institution de Banca Múltiple, HSBC México, S.A., Institución De Banca Múltiple, Grupo Financiero HSBC, and Bank of America México, S.A., Institución de Banca Múltiple, Scheduling Hearing for Final Approval Thereof, and Approving the Proposed Form and Program of Notice to the Class entered on August 19, 2026. ECF No. 384.

The Bond Buyer	September 21, 2026 and September 28, 2026
Barron's	September 28, 2026
Stocks & Commodities	October 2026
Hedge Fund Alert	September 30, 2026
Grant's Interest Rate Observer	September 28, 2026

15) Beginning on September 18, 2026, A.B. Data caused banner ads to be placed at the top of newsletters to "opt-in" subscribers of the following financial newsletter. A sample of the banner ad is attached hereto as Exhibit D.

E-Newsletter	**Date**
Stocks & Commodities	September 18, 2026- October 18, 2026

16) On September 18, 2026, A.B. Data caused a post to be published on "X" (formerly Twitter) to its account followers. Sample copies of the post are attached hereto as Exhibit E.

17) Beginning on October 6, 2026, A.B. Data caused an email "blast" to be sent to "opt-in" subscribers of the following publication. A sample of the email "blast" is attached hereto as Exhibit F.

E-Mail Blast	**Date**
Stocks & Commodities	October 6, 2026

WEBSITE

18) In accordance with the Preliminary Approval Order, A.B. Data updated the case-specific settlement website, www.MGBAntitrustSettlement.com that had been launched in connection with the administration of the earlier settlements with Barclays and JPMorgan. A.B. Data continues to maintain and update the website with information. The website lists, among other things, the exclusion, objection, and claim filing deadlines, the date and time of the Fairness Hearing, general information regarding the case and its current status, and provides answers to frequently asked questions. Users of the website can view and download copies of the Settlement Agreement (including exhibits), the Preliminary Approval Order, the Mailed and Media Notices,

the Claim Form, and copies of other Court documents. A true and accurate copy of the web homepage is attached as Exhibit G. Since entry of the Preliminary Approval Order on August 19, 2026, the settlement website has received 62 website visits totaling 147 page views.

19) Additionally, the website includes an email address (info@MGBAntitrustSettlement.com) for Claimants to contact A.B. Data with questions or for any additional information. A.B. Data has received a total of 21 emails as of October 14, 2026.

TOLL-FREE TELEPHONE LINE

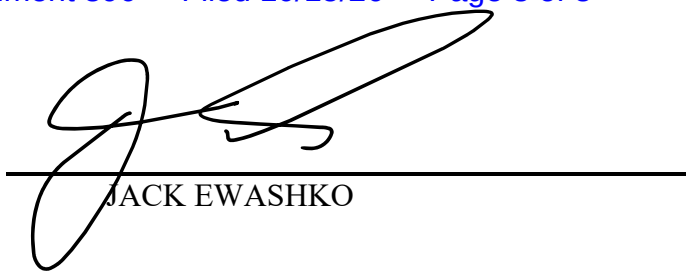
20) In accordance with the Preliminary Approval Order, a case-specific toll-free number, 877-829-2941, has been maintained (as well as a toll number for callers outside of the United States and Canada) with an Interactive Voice Response system and live operators. Callers to the numbers are presented with a series of choices to respond to basic questions. If callers need further help, they have the option to be transferred to a live operator during business hours. Since August 19, 2026, A.B. Data has received calls totalling 31 minutes.

REPORT ON OBJECTIONS AND REQUESTS FOR EXCLUSION RECEIVED TO DATE

21) The Mailed Notice informed Settlement Class Members that written objections and requests for exclusion from the Settlement Class must be filed or mailed by October 29, 2026. To date, A.B. Data has not received any objections or requests for exclusion.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 15, 2026, in Milwaukee, Wisconsin.



JACK EWASHKO