**UNITED STATES DISTRICT COURT**
**FOR THE SOUTHERN DISTRICT OF NEW YORK**

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| IN RE MEXICAN GOVERNMENT BONDS ANTITRUST LITIGATION | Master Docket No. 18-cv-02830 |
| THIS DOCUMENT RELATES TO:<br><br>ALL ACTIONS | |

**DECLARATION OF VINCENT BRIGANTI FILED ON BEHALF OF LOWEY DANNENBERG, P.C. IN SUPPORT OF PLAINTIFFS' LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES**

I, Vincent Briganti declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a member of the Bar of this Court and Chairman of the law firm Lowey Dannenberg, P.C. ("Lowey" or "Plaintiffs' Lead Counsel"). I submit this declaration in support of Plaintiffs' Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and Plaintiffs' Application for Service Awards ("Fee and Expense Application") filed concurrently herewith.

2. The statements herein are true to the best of my personal knowledge, information, and belief based on Lowey's books and records and information received from Lowey attorneys and staff.

3. My firm serves as the Court-appointed Plaintiffs' Lead Counsel in the above-captioned action (the "Action").

4. I am the partner who oversaw my firm's involvement in this Action together with Roland St. Louis. For purposes of this declaration, the schedule attached as Exhibit A summarizes the fee compensable time spent by Lowey's attorneys and professional staff and corresponding lodestar from (1) inception through May 31, 2020, (2) from June 1, 2020 through August 31, 2026, as well as (3) the total hours and lodestar. The hours were determined by the examination of contemporaneous, daily time records regularly prepared and maintained by my firm. The lodestar for the period from inception through May 31, 2020 is based on the firm's rates as described in the earlier fee and expense application submitted to the Court in connection with the Barclays and JPMorgan Settlements in this Action (*see* ECF No. 252), and the lodestar for the period from June 1, 2020 through August 31, 2026 is based on the firm's current 2026 hourly billing rates. The lodestar figures do not include costs related to expense items. Lowey time records have been reviewed to confirm both the accuracy of the entries as well as the necessity for and reasonableness of the time expended in this litigation. As a result of this review, certain reductions were made to time and lodestar either in the exercise of "billing judgment" or to conform with the requirements of this matter. Time spent by attorneys and staff who worked fewer than 15 hours on the case has been omitted from the lodestar calculation.

5. The hourly rates for the attorneys and other professional support staff at my firm are the same as the usual and customary hourly rates used for their services in contingent and non-contingent matters, and have been accepted by other courts in similar matters. *See Lopez v. Apple, Inc.*, No. 4:19-cv-04577 (N.D. Cal. Oct. 16, 2025), ECF No. 429 (approving fee award with Lowey's rates ranging from $425 to $1,650); *Fund Liquidation Holdings LLC v. UBS AG*, No. 1:15-cv-05844 (S.D.N.Y.), ECF No. 758 (May 6, 2024) (application reporting rates ranging from $300 for associates to $1,500 for partners), ECF Nos. 768-69 (June 18, 2024) (granting final approval and fees); *In re European Government Bonds Antitrust Litig.*, No. 1:19-cv-2601 (S.D.N.Y.), ECF No. 423-3 (October 30, 2023) (application including attorney rates ranging from $365 to $1,395), ECF No. 487 (April 19, 2024) (approving attorneys' fees); *see also Iowa Pub. Employees' Ret. Sys. v. Merrill Lynch, Pierce, Fenner & Smith Inc.*, No. 17-CV-6221 (KPF-SLC), 2024 WL 4149124, at *2 (S.D.N.Y. Sept. 11, 2024) (approving fee award in antitrust class action reflecting a lodestar multiplier of "0.70 (using current rates)"); *see also id.*, ECF No. 673-1 (May 8, 2024) (listing current rates for attorneys and professional staff at a peer firm ranging from $190 to $2,410).

6. For personnel no longer employed by Lowey, the lodestar calculation is based on the hourly rates for such personnel in his or her final year of employment. Work relating to first-level document review was capped at $350 per hour. As a result, the lodestar for certain timekeepers is less than the product of their hours and current hourly rate. Additionally, the time and lodestar spent preparing the Fee and Expense Application have been excluded.

7. The services Lowey performed on behalf of the Class in connection with the prosecution of this Action are set forth in the Declaration of Vincent Briganti in Support of (A) Plaintiffs' Motion for Final Approval of Class-Action Settlement; and (B) Plaintiffs' Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses, and Plaintiffs' Application for Service Awards, dated October 15, 2026 ("Briganti Decl."), filed herewith.

8. The total time for which my firm is requesting an award of legal fees is 13,420.35 hours. The total lodestar value of these professional services is $13,492,000.75.

9. Attached as Exhibit B is a schedule of Lowey's expenses reasonably incurred in connection with this Action since June 1, 2020 for which reimbursement is requested. Expense items are recorded separately from time, and are not duplicated in the firm's current hourly rates. Further, expense items do not contain any general overhead costs, and do not contain a surcharge over the amount incurred. The expense items also do not include any items included in the earlier fee and expense application submitted to the Court in connection with the Barclays and JPMorgan settlements in this Action.

10. As detailed and categorized in the schedule attached as Exhibit B, Lowey incurred a total of $85,163.16 in expenses from June 1, 2020 through August 31, 2026. The schedule is based upon expense records recorded in Lowey's books and records. These books and records are prepared from expense vouchers, check records, receipts, and other source materials.

11. To share in the cost of litigation, Plaintiffs' Lead Counsel (and certain Plaintiffs' Counsel) contributed to a litigation fund administered by Lowey. Attached as Exhibit C is a schedule of expenses reasonably incurred in connection with this Action paid from the litigation fund since June 1, 2020. A total of $69,531.13 was paid from the litigation fund to cover expert expenses and mediation costs.

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

Executed this 15th day of October 2026, at White Plains, New York.

*/s/ Vincent Briganti*
Vincent Briganti

**EXHIBIT A – Lodestar by Timekeeper**

| Attorneys | Role | Hours from inception to 5/31/2020 | Lodestar from inception to 5/31/2020 | Hours from 6/1/2020 to 8/31/2026 | Current/Last Hourly Rate | Lodestar from 6/1/2020 to 8/31/2026 | Total Hours from inception to 8/31/2026 | Total Lodestar from inception to 8/31/2026 |
|---|---|---|---|---|---|---|---|---|
| Vincent Briganti | S | 659.50 | $675,987.50 | 990.30 | $1,795 | $1,777,588.50 | 1,649.80 | $2,453,576.00 |
| Geoffrey M. Horn | S | 124.50 | $127,612.50 | 68.90 | $1,795 | $123,675.50 | 193.40 | $251,288.00 |
| Roland St. Louis III | P | 1,956.40 | $1,212,968.00 | 4,290.40 | $1,395 | $5,985,108.00 | 6,246.80 | $7,198,076.00 |
| Margaret C. MacLean | P | 50.50 | $42,925.00 | 334.20 | $1,395 | $466,209.00 | 384.70 | $509,134.00 |
| Christian Levis | P | 411.30 | $318,757.50 | -- | $1,395 | -- | 411.30 | $318,757.50 |
| Sitso Bediako | P | 283.50 | $191,362.50 | 243.20 | $1,395 | $339,264.00 | 526.70 | $530,626.50 |
| Amanda Fiorilla | P | 83.60 | $35,948.00 | -- | $1,395 | -- | 83.60 | $35,948.00 |
| Barbara J. Hart | P | 63.80 | $62,524.00 | -- | $980 | -- | 63.80 | $62,524.00 |
| Peter Demato Jr. | SA | 68.80 | $42,656.00 | 50.50 | $1,250 | $63,125.00 | 119.30 | $105,781.00 |
| Frank Strangeman | SA | 131.00 | $88,425.00 | 356.55 | $995 | $354,767.25 | 487.55 | $443,192.25 |
| Scott Papp | SA | -- | -- | 63.40 | $830 | $52,622.00 | 63.40 | $52,622.00 |
| Jonathan Seredynski | SA | 19.50 | $13,162.50 | 1.80 | $775 | $1,395.00 | 21.30 | $14,557.50 |
| Jennifer Tembeck | SA | 202.50 | $125,550.00 | -- | $620 | -- | 202.50 | $125,550.00 |

| Attorneys | Role | Hours from inception to 5/31/2020 | Lodestar from inception to 5/31/2020 | Hours from 6/1/2020 to 8/31/2026 | Current/Last Hourly Rate | Lodestar from 6/1/2020 to 8/31/2026 | Total Hours from inception to 8/31/2026 | Total Lodestar from inception to 8/31/2026 |
|---|---|---|---|---|---|---|---|---|
| Radhika Gupta | A | -- | -- | 87.70 | $895 | $78,491.50 | 87.70 | $78,491.50 |
| Anthony Christina | A | 22.60 | $10,283.00 | -- | $895 | -- | 22.60 | $10,283.00 |
| Thomas Griffith | A | 117.10 | $50,353.00 | -- | $895 | -- | 117.10 | $50,353.00 |
| Charles Kopel | A | 839.30 | $381,881.50 | 225.40 | $830 | $187,082.00 | 1,064.70 | $568,963.50 |
| Sylvie Bourassa | A | 34.80 | $14,964.00 | -- | $675 | -- | 34.80 | $14,964.00 |
| Xin Huang | A | -- | -- | 64.70 | $645 | $41,731.50 | 64.70 | $41,731.50 |
| Ian Sloss | A | 65.90 | $36,245.00 | -- | $550 | -- | 65.90 | $36,245.00 |
| Luke Goveas | A | -- | -- | 17.80 | $525 | $9,345.00 | 17.80 | $9,345.00 |
| Samantha Breitner | A | 18.20 | $7,826.00 | -- | $430 | -- | 18.20 | $7,826.00 |
| Bracha Gefen | A | 203.70 | $87,591.00 | -- | $430 | -- | 203.70 | $87,591.00 |
| Henry Kusjanovic | A | 122.50 | $52,675.00 | 32.30 | $430 | $13,889.00 | 154.80 | $66,564.00 |
| Amir Alimehri | A | 13.70 | $5,617.00 | -- | $410 | -- | 13.70 | $5,617.00 |
| James Pedersen | A | 24.40 | $9,760.00 | -- | $400 | -- | 24.40 | $9,760.00 |
| Timothy Rode | A | 283.00 | $110,370.00 | -- | $390 | -- | 283.00 | $110,370.00 |
| Grace Lee | A | 127.40 | $48,412.00 | -- | $380 | -- | 127.40 | $48,412.00 |
| Matthew Acocella | A | 103.30 | $38,737.50 | -- | $375 | -- | 103.30 | $38,737.50 |

| Attorneys | Role | Hours from inception to 5/31/2020 | Lodestar from inception to 5/31/2020 | Hours from 6/1/2020 to 8/31/2026 | Current/Last Hourly Rate | Lodestar from 6/1/2020 to 8/31/2026 | Total Hours from inception to 8/31/2026 | Total Lodestar from inception to 8/31/2026 |
|---|---|---|---|---|---|---|---|---|
| Matthew Roberts | A | 22.20 | $8,214.00 | -- | $370 | -- | 22.20 | $8,214.00 |
| Anthony Odorisi | A | 454.90 | $166,038.50 | -- | $365 | -- | 454.90 | $166,038.50 |
| Shelley Chauncey | A | 22.30 | $8,139.50 | -- | $365 | -- | 22.30 | $8,139.50 |
| Henry Kusjanovic (Document Review) | A | 4.10 | $1,435.00 | -- | $350 | -- | 4.10 | $1,435.00 |
| Mathew Roberts (Document Review) | A | 0.30 | $105.00 | -- | $350 | -- | 0.30 | $105.00 |
| Amir Alimehri (Document Review) | A | 2.00 | $700.00 | -- | $350 | -- | 2.00 | $700.00 |
| Joseph Mansilla | A | 20.40 | $7,140.00 | -- | $350 | -- | 20.40 | $7,140.00 |
| **SUBTOTAL:** | | **6,557.00** | **$3,984,365.50** | **6,827.15** | | **$9,494,293.25** | **13,384.15** | **$13,478,658.75** |
| **Non-Attorneys** | **Role** | **Hours from inception to 5/31/2020** | **Lodestar from inception to 5/31/2020** | **Hours from 6/1/2020 to 8/31/2026** | **Current Rate** | **Lodestar from 6/1/2020 to 8/31/2026** | **Total Hours from inception to 8/31/2026** | **Total Lodestar from inception to 8/31/2026** |
| Katherine Vogel | PL | 21.60 | $6,480.00 | 14.60 | $470 | $6,862.00 | 36.20 | $13,342.00 |

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|---|---|---|---|---|---|---|---|---|
| **SUBTOTAL:** | | **21.60** | **$6,480.00** | **14.60** | | **$6,862.00** | **36.20** | **$13,342.00** |
| **GRAND TOTALS** | | **6,578.60** | **$3,990,845.50** | **6,841.75** | | **$9,501,155.25** | **13,420.35** | **$13,492,000.75** |

Key:

S - Shareholder
P – Partner
SA – Senior Associate
A – Associate
PL – Paralegal

**EXHIBIT B – Firm Expenses**

Time Period: June 1, 2020 through August 31, 2026

| Expense Categories | Expenses |
|---|---|
| Court Costs/Filing Fees | $505.00 |
| Document Production/Hosting | $40,185.81 |
| Mediation Costs | $30,000.00 |
| Photocopies- In House | $1,905.10 |
| Computer Research/Databases | $9,481.97 |
| Postage/Overnight Mail/Messenger | $87.16 |
| Service of Process | $1,019.42 |
| Conferences, Meetings, Telephone & Telecopier | $45.62 |
| Travel (air/ground transportation, meals, hotel) | $1,933.08 |
| **TOTAL** | **$85,163.16** |

**EXHIBIT C – Litigation Fund Expenses**

Time Period: June 1, 2020 through August 31, 2026

| Expense Categories | Expenses |
|---|---|
| Experts/Consultants | $37,031.13 |
| Mediation | $32,500.00 |
| **TOTAL** | **$69,531.13** |