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 TODD A. SEAVER FILED ON BEHALF OF BERMAN TABACCO IN SUPPORT OF PLAINTIFFS' LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES

I, Todd A. Seaver, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner with the law firm Berman Tabacco ("Berman Tabacco"). I am an attorney duly licensed to practice before the courts of the Massachusetts and New York and am admitted before this Court. 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 the books and records of Berman Tabacco and information received from Berman Tabacco attorneys and staff.

3. My firm serves as one of the Plaintiffs' Counsel and counsel of record for Named Plaintiffs Oklahoma Firefighters Pension Retirement System ("OFPRS") and Electrical Workers Pension Fund Local 103, I.B.E.W. ("Local 103") in the above-captioned action (the "Action").

4. At the outset of this litigation, Berman Tabacco entered into a retainer agreements with OFPRS and Local 103. OFPRS and Local 103 negotiated a graduated fee structure at the outset of this litigation that provides for a fee of 30% from the common fund on the first $50 million recovered and 29% from the common fund on the second $150 million recovered. Both OFPRS and Local 103 have remained active participants in litigating this Action.

5. I am the partner who oversaw my firm's involvement in this Action together with Patrick T. Egan. For purposes of this declaration, the schedule attached as Exhibit A summarizes the fee compensable time spent by Berman Tabacco's attorneys and professional staff and corresponding lodestar from (1) inception through May 31, 2020, (2) from June 1, 2020 through August 30, 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. 253). The lodestar for the period from June 1, 2020 through August 30, 2026 is based on the firm's current 2026 hourly

billing rates. The lodestar figures do not include costs related to expense items. Berman Tabacco 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.

6. 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 matters, and these rates have been approved this year (2026) by other courts in complex antitrust class actions my firm litigated. *See Moskowitz v. American Express Co.*, No. 1-19-cv-566-NGG (E.D.N.Y.) at Dkt Nos. 402, 403, 411 (attorneys' fee motion, declaration supporting fees including hourly rates, order granting fee motion in 2026); *Iron Workers District Council of New England Health and Welfare Fund v. Teva Pharmaecutical Indus. Ltd*., No. 23-cv-1131-NMG (D.Mass.) at Dkt Nos. 209, 210, 220 (attorneys' fee motion, declaration supporting fees including hourly rates, order granting fee motion in 2026). For personnel no longer employed by Berman Tabacco, 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. Higher-level document review in connection with adducing fact allegations to add to amended complaints and for purposes of opposing Rule 12 motions was performed by a senior of counsel attorney with years of experience analyzing bond trader chats and communications and other bond market-related internal bank documents in other antitrust litigation concerning bond market price manipulation in both primary markets and secondary markets, and was therefore billed at a rate higher than $350 per hour.

8. The services Berman Tabacco performed on behalf of the Class include, but are not

limited, the following:

- Conducted pre-filing investigation of clients' claims, including the collection and analysis of years' worth of their relevant transaction data in various types of Mexican bonds to evaluate their exposure and standing to sue.
- At Plaintiffs' Lead Counsel's direction, played a signficant part in opposing multiple rounds of motions to dismiss brought by defendants, and analyzed documents and testimony provided by the cooperating, settled defendants to amend the complaint and strengthen the claims.
- Engaged in discovery meet and confers, as well as the collection and review of documents; and
- Apprised OFPRS and Local 103 of case developments and settlement negotiations in the Action and worked with them to obtain information alleged in the complaints filed in the Action and to discuss and approve strategic decisions.

9. The total time for which my firm is requesting an award of legal fees is 2,186.25 hours. The total lodestar value of these professional services is $1,574,818.50.

10. Attached as Exhibit B is a schedule of Berman Tabacco'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.

11. As detailed and categorized in the schedule attached as Exhibit B, Berman Tabacco incurred a total of $3,530.84 in expenses from June 1, 2020 through August 31, 2026. The schedule is based upon expense records recorded in Berman Tabacco's books and records. 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 this 15th day of October, 2026, at San Francisco, California.

/s/ Todd A. Seaver
Todd A. Seaver

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 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
Tabacco, Joseph	Partner	48.70	$50,404.50				48.70	$50,404.50
Lavallee, Nicole	Partner	22.80	$23,142.00				22.80	$23,142.00
Stern, Leslie	Partner	63.90	$63,261.00	0.70	$1,295.00	$906.50	64.60	$64,167.50
Seaver, Todd	Partner	258.10	$238,742.50	50.60	$1,210.00	$61,226.00	308.70	$299,968.50
Egan, Patrick	Partner	47.90	$44,307.50	95.9	$1,210.00	$116,039.00	143.8	$160,346.50
Hammarskjold, Carl	Partner	286.80	$183,552.00	167.3	$940.00	$157,262.00	454.1	$340,814.00
Cleary, Colleen	Associate	300.80	$135,360.00	4.50	$510.00	$2,295.00	305.30	$137,655.00
Lowell, Brooke	Associate			36.20	$445.00	$16,109.00	36.20	$16,109.00
McGrath, Sarah	Senior Of Counsel			589.3	$655.00	$385,991.50	589.3	$385,991.50
McGrath, Sarah	Senior Of Counsel			81.5	$350.00	$28,525.00	81.5	$28,525.00
SUBTOTAL:		**1,029.00**	**$738,769.50**	**1,026**		**$768,354.00**	**2,055**	**$1,507,123.50**

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
Misra, Jessica	Financial Analyst	100.25	$52,130.00	8.00	$695.00	$5,560.00	108.25	$57,690.00
Beaulieu, Karen	Financial Analyst	23.00	$10,005.00				23.00	$10,005.00
SUBTOTAL:		**123.25**	**$62,135.00**	**8.00**		**$5,560.00**	**131.25**	**$67,695.00**
GRAND TOTAL		**1,152.25**	**$800,904.50**	**1,034**		**$773,914.00**	**2,186.25**	**$1,574,818.50**

EXHIBIT B – Firm Expenses

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

Expense Categories	Expenses
Court Costs	
Experts/Consultants	$2,246.25
Photocopies- In House	$97.68
Photocopies- Outside	
Computer Research/Databases	$1,135.17
Postage/Overnight Mail/Messenger	
Service of Process	
Conferences, Meetings, Telephone & Telecopier	$33.00
Travel (air/ground transportation, meals, hotel)	$18.74
Miscellaneous	
TOTAL	**$3,530.84**