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 DARYL F. SCOTT FILED ON BEHALF OF SCOTT+SCOTT ATTORNEYS AT LAW LLP IN SUPPORT OF PLAINTIFFS' LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES

I, Daryl F. Scott, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner with the law firm Scott+Scott Attorneys at Law LLP ("Scott+Scott"). 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 Scott+Scott and information received from Scott+Scott attorneys and staff.

3. My firm serves as one of the Plaintiffs' Counsel and counsel of record for Named Plaintiff United Food and Commercial Workers Union and Participating Food Industry Employers Tri-State Pension Fund ("UFCW Tri-State") in the above-captioned action (the "Action").

4. Scott+Scott partners Patrick J. Coughlin and Brian M. Hogan oversaw my firm's involvement in this Action. The schedule attached as Exhibit A summarizes the compensable time spent by Scott+Scott'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 are based on contemporaneous daily time records 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. 254), 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. Scott+Scott reviewed its time records to confirm both the accuracy of the entries as well as the necessity for and reasonableness of the time expended in this litigation. Scott+Scott reduced certain time and lodestar entries in the exercise of billing judgment and 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 approved by other courts in similar matters. *See, e.g.*, *In re European Government Bonds Antitrust Litig.*, No. 1:19-cv-02601 (S.D.N.Y. Oct. 18, 2024), ECF No. 517-1 (submitting Scott+Scott partner hourly rates of $1,095 to $1,595); *id.* (S.D.N.Y. Dec. 9, 2024), ECF No. 531 (approving attorney's fee request); *Othart Dairy Farms, LLC, et al. v. Dairy Farmers of Am., Inc.*, No. 2:22-cv-00251 (D.N.M. Sept. 29, 2025), ECF No. 218-3 at Ex. 1 (submitting Scott+Scott partner hourly rates of $895 to $2,050); *id.* (D.N.M. Dec. 8, 2025), ECF No. 228 ¶2 (approving one-third attorneys' fee request); *In re Cattle and Beef Antitrust Litig.*, No. 0:22-md-03031 (D. Minn. Aug. 15, 2025), ECF No. 1439; *In re Metformin Mktg. and Sales Pracs. Litig.*, No. 2:20-cv-02324 (D.N.J. June 26, 2026), ECF No. 670-7 (submitting Scott+Scott partner hourly rates of $900 to $1,960); *id.* (D.N.J. Aug. 12, 2026), ECF No. 687 (approving attorneys' fee request); and *In re Surescripts Antitrust Litig.*, No. 1:19-cv-06627, (N.D. Ill. Dec. 18, 2025), ECF No. 421, slip op. ¶4 (approving fee award with Scott+Scott's rates ranging from $415 to $1,900); *Steamship Trade Ass'n of Balt. – Int'l Longshoremen's Ass'n Pension Fund v. Olo Inc.*, No. 1:22-cv-08228, (S.D.N.Y. Jun. 11, 2024), ECF No. 128 (approving fee award with Scott+Scott's rates ranging from $1,150 to $1,975 for partners or senior counsel).

6. For personnel no longer employed by Scott+Scott, 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 Scott+Scott performed on behalf of the Class include, but are not limited to, the following:

- researched, drafted, and revised the initial complaints and subsequent consolidated and amended pleadings;

- researched and drafted sections of opposition briefing on defendants' motions to dismiss, addressing antitrust standing, personal jurisdiction, and statute of limitations;

- reviewed, analyzed, and drafted objections and responses to defendants' document requests and interrogatories;

- led plaintiff-side discovery for named class representative UFCW Tri-State, including coordinating document collection, managing document review, and identifying responsive materials to be produced; and

- drafted motion for preliminary approval with remaining defendants, including supporting memorandum of law and related papers.

8. From June 1, 2020 through August 31, 2026, my firm expended 368.70 hours with a lodestar value of these professional services of $492,895.00. The total case hours my firm has spent are 1,584.90 with a total case lodestar value of $1,392,129.50.

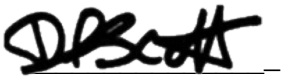
9. Attached as Exhibit B is a schedule of Scott+Scott's expenses reasonably incurred in connection with this Action since June 1, 2020 for which reimbursement is requested. Expense items are recorded separately from time and are not duplicated in the firm's current hourly rates. Further, expense items 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, Scott+Scott incurred a total of $4,831.02 in expenses from June 1, 2020 through August 31, 2026. The schedule is based upon expense records recorded in Scott+Scott's books and records. These books and records are prepared from expense vouchers, check records, receipts, and other source materials.

11. The expense total does not include contributions made by Scott+Scott to the litigation fund established by Plaintiffs' Lead Counsel to fund various litigation expenses.

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

Executed this 12th day of October 2026, at Richmond, Virginia.



Daryl F. Scott

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
David R. Scott	P	27.60	$35,742.00				27.60	$35,742.00
Daryl F. Scott	P	17.80	$20,470.00	15.40	$1,960	$30,184.00	33.20	$50,654.00
Christopher Burke	P	137.30	$177,803.50	27.90	$1,395	$38,920.50	165.20	$216,724.00
Walter Noss	P	18.40	$20,148.00				18.40	$20,148.00
Amanda Lawrence	P	35.70	$35,521.50				35.70	$35,521.50
Peter Barile	P	87.10	$86,664.50				87.10	$86,664.50
Thomas Boardman	A	326.60	$244,950.00				326.60	$244,950.00
Hal Cunningham	A	109.40	$82,050.00				109.40	$82,050.00
Michelle Conston	A	116.00	$75,400.00	48.00	$990	$47,520.00	164.00	$122,920.00
Brandon Zapf	SA	73.50	$29,400.00				73.50	$29,400.00
Nga Cunningham	SA	25.60	$8,960.00				25.60	$8,960.00
Voltaire Sterling	SA	110.80	$38,780.00				110.80	$38,780.00
Ana Del Castillo	SA	84.50	$29,575.00				84.50	$29,575.00
Kristen Anderson	OC			20.80	$1,135	$23,608.00	20.80	$23,608.00
Daniel Brockwell	A			61.50	$700	$43,050.00	61.50	$43,050.00
Patrick Coughlin	P			106.40	$1,960	$208,544.00	106.40	$208,544.00
Dustin Foster	OC			35.70	$1,005	$35,878.50	35.70	$35,878.50
Brian Hogan	P			53.00	$1,230	$65,190.00	53.00	$65,190.00
SUBTOTAL:		**1,170.30**	**$885,464.50**	**368.70**		**$492,895.00**	**1,539.00**	**$1,378,359.50**

Partner (P), Senior Associate (SA), Associate (A), Of Counsel (OC)

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
Ellen DeWan	PL	45.90	$13,770.00				45.90	$13,770.00
SUBTOTAL:		**45.90**	**$13,770.00**				**45.90**	**$13,770.00**
GRAND TOTAL:		**1,216.20**	**$899,234.50**	**368.70**		**$492,895.00**	**1,584.90**	**$1,392,129.50**

Paralegal (PL)

EXHIBIT B – Firm Expenses

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

Expense Categories	Expenses
Court Costs	$257.00
Experts/Consultants	
Photocopies- In House	$13.25
Photocopies- Outside	
Computer Research/Databases	$211.62
Postage/Overnight Mail/Messenger	$39.71
Service of Process	
Conferences, Meetings, Telephone & Telecopier	$91.32
Travel (air/ground transportation, meals, hotel)	$4,218.12
Miscellaneous	
TOTAL	**$4,831.02**