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 THAYNE STODDARD ON BEHALF OF BLEICHMAR FONTI & AULD LLP IN SUPPORT OF PLAINTIFFS' LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES

I, Thayne Stoddard, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a partner with the law firm Bleichmar Fonti & Auld LLP ("BFA"). I am an attorney duly licensed to practice before the courts of the state of New York and am admitted before this Court. I respectfully 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 BFA's books and records and information received from its attorneys and staff.

3. My firm serves as one of the Plaintiffs' Counsel and is counsel of record for Named Plaintiffs Southeastern Pennsylvania Transportation Authority ("SEPTA"), Metropolitan Transportation Authority Defined Benefit Pension Plan Master Trust ("MTADBBP"), and Manhattan and Bronx Surface Transit Operating Authority Pension Plan ("MaBSTOA"), each of whom serves as a Named Plaintiff in the above-captioned action (the "Action").

4. I am currently the partner overseeing my firm's involvement in the Action. For purposes of this declaration, the schedule attached as Exhibit A summarizes the fee compensable time spent by BFA'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. 257), and 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. BFA's 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. As a result of this review and related reductions, the time reflected in BFA's lodestar calculation and the expenses for which payment is sought are reasonable in amount and were necessary to prosecute the Action and resolve the settlement before the Court.

5. The hourly rates for attorneys and professional support staff in my firm are the same as the regular rates charged for their services in contingent fee matters and non-contingent fee matters, and have been approved by other courts in similar matters. *See In re Talis Biomedical Sec. Litig.*, No. 22-cv-00105-SI, ECF Nos. 191-3, 203 (N.D. Cal. Mar. 21, 2025) (approving BFA's hourly rates of $330 to $1,250); *see also Bilinsky v. Gatos Silver, Inc.*, No. 1:22-cv-00453-PAB-KAS, ECF Nos. 91-6 & 97 (D. Colo. Oct. 15, 2024) (approving BFA's hourly rates of $375 to $1,250); Settlement Approval Hearing Transcript, *In re Teva Sec. Litig.*, No. 3:17- cv-00558 (SRU) (D. Conn.) (June 2, 2022), at 28-29 (granting fee request and accepting BFA's rates); *Police Ret. Sys. of St. Louis v. Granite Constr. Inc.*, No. C 19-04744 WHA, 2022 WL 816473, at *9 (N.D. Cal. Mar. 17, 2022) ("This order accepts [BFA's] claimed rates as generally tracking the going rate for those with the same levels of skill and experience in our geographic region."). For personnel no longer employed by BFA, the lodestar calculation is based on the billing 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.

6. The services BFA performed on behalf of the putative class include, but are not limited to, the following:

- Researching and analyzing claims, and drafting the complaints;
- Analyzing purchase and pricing data as well as economic materials to assess damages, and working with experts to create a damages model;
- Assisting with research, and drafting the oppositions to the motions to dismiss;
- Assisting with drafting discovery requests and responses; and
- Collecting documents and ESI from, and conducting discovery on behalf of, Plaintiffs SEPTA, MTADBBP, and MaBSTOA.

7. The total time for which my firm is requesting an award of legal fees is 583.0 hours. The total lodestar value of these professional services is $445,798.50.

8. Attached as Exhibit B is a schedule of BFA'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.

9. As detailed and categorized in the schedule attached as Exhibit B, BFA has incurred a total of $1,350.67 in expenses from June 1, 2020 through August 31, 2026. The schedule is based upon expense records recorded in BFA'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 on October 15, 2026
New York, New York



Thayne Stoddard

EXHIBIT A – BFA 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
Davis, Anne	P	0	0	81.9	$1,150	$94,185.00	81.9	$94,185.00
Stoddard, Thayne	P	0	0	20.2	$1,025	$20,705.00	20.2	$20,705.00
Weaver, Lesley	P	124.6	$110,271.00	29.4	$1,395	$41,013.00	154	$151,284.00
Simnowitz, Sara	SC	21.1	$14,981.00	0	NA	0	21.10	$14,981.00
Ornelas, Angelica	A	34.0	$22,270.00	1.5	$760	$1,140	35.5	$23,410.00
Weiler, Matthew	A	148.4	$97,202.00	0	NA	0	148.4	$97,202.00
Lindley, Robert	SA	21.9	$7,884.00	0	NA	0	21.9	$7,884.00
Sum, Sylvia	SA	0	0	84.7	$350	$29,645.00	84.7	$29,645.00
SUBTOTAL:		**350.0**	**$252,608.00**	**217.7**		**$186,688.00**	**567.7**	**$439,296.00**
Non-Attorneys	**Role**	**Hours from inception to 5/31/2020**	**Lodestar from inception to 5/31/2020**	**Hours from 6/1/2020 to 8/31/2026**	**Current Rate**	**Lodestar from 6/1/2020 to 8/31/2026**	**Total Hours from inception to 8/31/2006**	**Total Lodestar from inception to 8/31/2006**
Law, Julie	Para.	0$	0	15.3	$425	$6,502.50	15.3	$6,502.50
SUBTOTAL:		**0**	**0**	**15.3**	**$425**	**$6,502.50**	**15.3**	**$6,502.50**
GRAND TOTAL		**350.0**	**$252,608.00**	**233.0**		**$193,190.50**	**583**	**$445,798.50**

Key: "P" refers to Partners. "SC" refers to Special Counsel. "A" refers to Associates. "SA" refers to Staff Attorneys. "Para." refers to paralegals.

EXHIBIT B – BFA Expenses

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

Expense Categories	Expenses
Service and Filing Fees	$200.00
Experts/Consultants	$550.45
Litigation Support Vendor Fees (Database)	$317.00
Computer Research	$283.22
TOTAL	**$1,350.67**