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 WILLIAM J. BAN FILED ON BEHALF OF BARRACK, RODOS & BACINE IN SUPPORT OF PLAINTIFFS' LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES

I, William J. Ban, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner with the law firm Barrack, Rodos & Bacine ("Barrack"). I am an attorney duly licensed to practice before the courts of the State of New York and the Commonwealth of Pennsylvania 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 Barrack and information received from Barrack's attorneys and staff.

3. My firm serves as one of the Plaintiffs' Counsel and counsel of record for Named Plaintiff Virgin Islands Government Employees' Retirement System ("GERS") in the above-captioned action (the "Action").

4. I am the partner who oversaw my firm's involvement in this Action together with Jeffrey A. Barrack. For purposes of this declaration, the schedule attached as Exhibit A summarizes the fee compensable time spent by Barrack's attorneys and professional staff and corresponding lodestar (1) from inception through May 31, 2020, and (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. 260), 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. Barrack'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. 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 matters, and have been approved by other courts in similar matters. *See e.g.*: *Allegheny County Employees' Retirement System v. Energy Transfer LP*, No. 2:20-cv-00200-GAM (E.D. Pa.) (Hon. Gerald Austin McHugh), ECF No. 285 (Oct. 8, 2025); and *In re Dentsply Sirona, Inc. Securities Litigation,* 18-cv-07253-NG-PK (E.D.N.Y.) (Hon. Nina Gershon), ECF No. 191 (Sept 11, 2025) (approving current rates), and ECF No. 184, Exs. 3 and 5 (chart showing hours, hourly rates and lodestar of Lead Counsel Barrack and Survey of Law Firm Billing Rates – Plaintiffs' Firms). For personnel no longer employed by Barrack (here only Jeffrey B. Gittleman, Esq.), the lodestar calculation is based on the hourly rate in his final year with the Barrack firm (2020). No attorney in the Barrack firm was assigned to or performed any first-level document review work. However, starting on May 10, through June 3, 2024, I was assigned by Plaintiffs' Lead Counsel to conduct a sentior-level re-examination and focused analysis of a defined set of previously reviewed complex "chat room" transcript documents in mixed Spanish and English as described below. My time for that specific senior-level assignment was 73.90 hours and has been included at the normal current billing rate. Additionally, the time and lodestar spent preparing the Fee and Expense Application have been excluded.

6. The services performed on behalf of the Class by Barrack include, but are not limited, the following:

- investigated underlying facts, and extensively consulted with GERS to develop the basis for and evaluate potential claims by the client;
- prepared GERS' class action complaint filed by Barrack on May 25, 2018 (case No. 18-cv-04673), prior to consolidation. Prior to filing, the Barrack firm prepared and made a formal in-person presentation to the GERS Board of Directors for authorization to file and for GERS to seek to participate in the litigation as a Class Representative;

- coordinated with Plaintiffs' Lead Counsel Lowey Dannenberg, P.C. on behalf of the Class as well as GERS, to prepare/obtain approval of all filings including the original Consolidated Amended Complaint and subsequent Consolidated Complaints, all motions made on behalf of the Class, all responses to motions made by Defendants; and discovery requests and responses;

- communicated with GERS regarding the status of the case, including via emails, telephone calls and conferences, Zoom sessions and in-person meetings with GERS General Counsel, Ishmael A. Meyers, Jr., and in-person status presentations to the GERS Board of Directors and other officials;

- since June 1, 2020, Barrack:

    - contributed to briefing for the successful appeal to the Second Circuit;

    - assisted with developing and drafting allegations in the Third Amended and Consolidated Complaint ("Third CAC") including a specific assignment from Plaintiffs' Lead Counsel for senior level re-analysis, informed examination and interpretation of extensive "chat room" transcript documents obtained from the two early settling defendants in order to provide and inform additional allegations in the TAC;

    - assisted with researching and drafting the opposition to the motion to dismiss the Third CAC in coordination with Plaintiffs' Lead Counsel;

    - analyzed Defendants' discovery requests and coordinated with Plaintiffs' Lead Counsel to prepare Plaintiffs' responses to Defendants' discovery requests;

    - drafted written responses to Defendants' discovery requests, participated in meet-and-confer sessions with Defendants' Counsel, prepared overview charts to track Defendants' RFPs and the status of agreements/disputes resulting from the numerous meet-and-confer sessions;

    - supervised and coordinated GERS' response to discovery requests;

    - coordinated with Plaintiffs' Lead Counsel with respect to formulating Plaintiffs' discovery requests to Defendants, analyze Defendants' objections and responses, and formulate a strategy with respect thereto;

    - participated in meet-and-confer sessions regarding Plaintiffs' discovery requests; and

    - assisted in the response to Defendants' non-party discovery served on GERS' former investment manager, Brandywine.

7. The total time, from inception, for which my firm is requesting an award of legal

fees is 657.85 hours. The total lodestar value of these professional services is $641,871.00.

8. Attached as Exhibit B is a schedule of Barrack'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, Barrack has incurred a total of $8,113.04 in expenses from June 1, 2020 through August 31, 2026. The schedule is based upon expense items recorded in Barrack's books and records. These books and records are prepared from expense vouchers, check records, receipts, and other source materials. These expenses include $6,698.78 in travel expenses for in-person meetings with and presentations to the GERS Board of Directors and GERS officers (General Counsel, Chief Information Officer and Administrator) in San Juan, Puerto Rico to report on the status of the litigation and facilitate GERS' discovery responses, including logistics for electronic document collection and production. Any travel and hotel expenses incurred conform to the airfare and hotel rate restrictions required for this case and have been submitted to Plaintiffs' Lead Counsel for examination and approval.

10. The expense total does not include contributions made by Barrack 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 14th day of October, 2026, at New York, New York.

William J. Barr

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 8/31/2006	Total Lodestar from inception to 8/31/2006
Jeffrey A. Barrack	Partner	53.00	$42,400.00	33.70	$1,250	$42,125.00	87.70	$84,525.00
Jeffrey B. Gittleman	Partner	48.50	$38,800.00	4.75	$840*	$3,990.00	53.25	$42,790.00
William J. Ban	Partner	116.60	$82,786.00	369.10	$1,100	$406,010.00	485.70	$488,796.00
Andrew J. Heo	Associate	0	N/A	32.20	$800	$25,760.00	32.20	$25,760.00
TOTAL:		**218.10**	**$163,986.00**	**439.75**		**$477,885.00**	**657.85**	**$641,871.00**

- $840/hr. was the hourly rate for Mr. Gittleman at the time he left the Barrack Firm.

EXHIBIT B – Firm Expenses

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

Expense Categories	Expenses
Court Costs	$0.00
Experts/Consultants	$0.00
Photocopies- In House	$2.60
Photocopies- Outside	$0.00
Computer Research/Databases	$1,065.10
Postage/Overnight Mail/Messenger	$0.00
Service of Process	$0.00
Conferences, Meetings, Telephone & Telecopier	$346.56
Travel (air/ground transportation, meals, hotel)	$6,698.78
Miscellaneous	$0.00
TOTAL	**$8,113.04**