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 MARK PRIOR IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND PLAINTIFFS' LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES, AND PLAINTIFFS' APPLICATION FOR SERVICE AWARDS

I, Mark Prior, pursuant to 28 U.S.C. §1746, declare as follows:

1. I respectfully submit this declaration in support of (a) Plaintiffs' Motion for Final Approval of the Class Action Settlement with Defendants Banco Santander México, S.A., Institución de Banca Múltiple, Grupo Financiero Santander México (formerly known as Banco Santander (México), S.A., Institución de Banca Múltiple, Grupo Financiero Santander México), BBVA México, S.A., Institución de Banca Múltiple, Grupo Financiero BBVA México (formerly known as BBVA Bancomer S.A., Institución de Banca Múltiple, Grupo Financiero BBVA Bancomer), Banco Nacional de México, S.A., Institución de Banca Múltiple, Grupo Financiero Banamex,[1] Deutsche Bank México, S.A., Institution de Banca Múltiple ("Deutsche Bank Mexico"),[2] HSBC México, S.A., Institución De Banca Múltiple, Grupo Financiero HSBC, and Bank of America México, S.A., Institución de Banca Múltiple (collectively, "Settling Defendants"), and (b) Plaintiffs' Lead Counsel's Motion for Award of Attorneys' Fees and Expenses, and Plaintiffs' Application for Service Awards. The statements herein are true to the best of my personal knowledge, information, and belief.

2. I am General Counsel at Southeastern Pennsylvania Transportation Authority ("SEPTA"), one of the Named Plaintiffs in this Action. As General Counsel, I am responsible for providing legal advice and representation to SEPTA in various litigation, including the above-captioned action (the "Action"), and generally supervise SEPTA's relationships with outside

[1] The parties understand and agree that the entity described in this litigation as "Banco Nacional de México, S.A., Institución de Banca Múltiple, Grupo Financiero Banamex" refers to Banco Nacional de Mexico, S.A., integrante del Grupo Financiero Banamex.

[2] Deutsche Bank Mexico came under the ownership of Grupo Financiero Citi México, S.A. de C.V. and Citi GSCP Inc., both of which are indirect, wholly owned subsidiaries of Citigroup Inc. Deutsche Bank Mexico was renamed Banco Citi México, S.A. Institución de Banca Múltiple, Grupo Financiero Citi México, which is now an indirect, wholly owned subsidiary of Citigroup Inc.

counsel. My predecessor, Gino Benedetti, was previously responsible for overseeing the Action from its inception until his retirement in 2025. I became General Counsel in August 2025, and have since familiarized myself with the Action generally and the previous work that counsel and SEPTA have done to prosecute it.

3. SEPTA is one of the largest transit systems in the country, supporting five counties in the greater Philadelphia area, and connecting to transit systems in Delaware and New Jersey. Its services include regional rail, buses, trolleys, subways, and a high-speed line. SEPTA's 9,500 employees serve millions of people on a regular basis.

4. I have personal knowledge of the facts set forth in this Declaration as, during my tenure as General Counsel, I have been involved in monitoring and overseeing the prosecution of the Action as well as approving the Settlement, and I could and would testify competently thereto.

5. On behalf of SEPTA, throughout the litigation, Mr. Benedetti and I have had ongoing communications with counsel. Mr. Benedetti and I supervised, monitored and were actively involved in material aspects of the prosecution of the Action. Mr. Benedetti and I, along with other SEPTA employees, participated in regular discussions with counsel concerning the prosecution of the Action, discovery related matters, the strengths and weaknesses of the claims asserted in the Action, and the eventual settlements. Throughout the litigation, Mr. Benedetti and I received periodic reports from counsel on important case developments.

6. As a Named Plaintiff, I understand SEPTA's responsibilities to have included, among other things: (a) taking all necessary steps to further the litigation and dutifully represent the rights of all Class Members; (b) producing all relevant facts and documents necessary to pursue the Action; (c) reviewing pleadings and motions and otherwise overseeing the litigation; (d) testifying at deposition and/or trial; (e) staying informed about the lawsuit's progress; and (f) assisting Plaintiffs' Lead Counsel in prosecuting the Action on behalf of the Class.

7. During the course of this litigation, Mr. Benedetti or I, as well as other SEPTA employees, performed the following tasks, among others:

(a) gathering SEPTA's trading records for the Class Period;

(b) reviewing SEPTA's transactions with counsel for purposes of drafting and supporting the allegations in the complaints;

(c) reviewing the pleadings filed in this Action, including the amended complaints;

(d) participating in discovery by searching for and collecting relevant documents in response to Defendants' requests for production and providing information in response to interrogatories;

(e) discussing the settlement negotiations with counsel.

8. To date, I estimate that Mr. Benedetti, other employees of SEPTA, and I have spent at least 50 hours performing duties in support of SEPTA's role as a class representative.

9. SEPTA, through Mr. Benedetti's and my involvement, was informed of the status and progress of the litigation and the settlement negotiations. On behalf of SEPTA, I discussed the nature of the Settlement and the Settlement Amount with counsel and approved Plaintiffs' Lead Counsel's recommendation.

10. Based on Mr. Benedetti's and my involvement throughout the prosecution and resolution of the claims asserted in the Action, SEPTA believes that the Settlement provides a fair, reasonable, and adequate recovery for the Class.

11. In light of Plaintiffs' Counsel's efforts in the Action on behalf of the Class and the results they achieved, Plaintiffs' Lead Counsel's request for an award of attorneys' fees in the amount of approximately 29.34% of the Settlement Fund is fair and reasonable.

12. The engagement agreement entered between counsel and SEPTA specified that the Action would be undertaken by Plaintiffs' Lead Counsel on a contingency basis, and that

Plaintiffs' Lead Counsel would apply to the Court for an award of counsel fees from the gross classwide recovery, plus disbursements.

13. SEPTA has not received, nor has been promised or offered any financial incentive or compensation for serving as a Named Plaintiff in the Action. Nevertheless, SEPTA understands that courts may authorize an award to a class representative relating to their representation of a class, and that the Class in this Action has been given notice of Plaintiffs' intention to seek Service Awards. SEPTA recognizes that the grant of such an award is entirely in the Court's discretion.

14. The significant amount of time that SEPTA's staff devoted to the representation of the Class in this Action—including, among things, time spent actively participating in the discovery process, participating on calls with counsel, reviewing correspondence, and reviewing drafts of pleadings and other Court filings—was time that could have dedicated to other activities. SEPTA's willingness to serve as class representative and efforts on behalf of the Class were essential to obtaining this $86.4 million settlement for the benefit of all Class Members.

15. Accordingly, SEPTA respectfully requests that the Court approve a service award in the amount of $10,000, which is commensurate with its contributions to the Action.

16. SEPTA was actively involved in the prosecution and settlement of the claims in this Action and, based on that participation, strongly endorses the Settlement as fair, reasonable, and adequate. The Settlement represents a significant recovery for the Class in light of the challenges and risks of the case. SEPTA therefore respectfully requests that the Court approve Plaintiffs' motion for final approval of the Settlement. Based on our collective efforts on the Class's behalf, SEPTA also asks that the Court grant Plaintiffs' Lead Counsel's request for attorneys' fees and expenses, and the request for a Service Award.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1ST day of October 2026, in Philadelphia, Pennsylvania.

Mark Prior