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 ISHMAEL A. MEYERS, JR. 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, Ishmael A. Meyers, Jr., 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) ("Santander Mexico"), 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) ("BBVA México"), Banco Nacional de México, S.A., Institución de Banca Múltiple, Grupo Financiero Banamex ("Citibanamex"),[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 ("HSBC Mexico"), and Bank of America México, S.A., Institución de Banca Múltiple ("Bank of America Mexico") (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 for the Government Employees' Retirement System of the Virgin Islands ("GERS"), one of the Named Plaintiffs in this Action. As General Counsel, I am

[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.

responsible for providing legal advice and representation to GERS in all litigation, including supervising GERS relationships with outside counsel.

3. Plaintiff Government Employees' Retirement System of the Virgin Islands is a pension system with over $700 million in assets under management for the benefit of more than 8,669 active members and more than 8,498 retirees and pensioners.

4. I have personal knowledge of the facts set forth in this Declaration and I have been directly involved in monitoring and overseeing the prosecution of the Action from its inception as well as the negotiations leading to the Settlement, and I could and would testify competently thereto.

5. On behalf of GERS, throughout the litigation, I have had regular communications with GERS' counsel, Barrack, Rodos & Bacine, and understand that the Lowey Dannenberg law firm has served as the Court-appointed Plaintiffs' Lead Counsel in the Action. I closely supervised, carefully monitored, and was actively involved in material aspects of the prosecution of the Action. I participated in regular discussions with attorneys from Barrack, Rodos & Bacine concerning the prosecution of the Action, the strengths and weaknesses of the claims asserted in the Action, and potential settlements. Throughout the litigation, I received periodic status reports from Barrack, Rodos & Bacine on case developments.

6. As a Named Plaintiff, I understood GERS' responsibilities to include, 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 Barrack, Rodos & Bacine and Plaintiffs' Lead Counsel in prosecuting the Action on behalf of the Class.

7. During the course of this litigation, I or other employees of GERS performed the following tasks, among others:

(a) Maintaining consistent contact and communications with GERS' direct counsel Barrack, Rodos & Bacine, including individual attorneys Jeffrey A. Barrack, and William J. Ban concerning the status and progress of the litigation;

(b) Supervising gathering and producing GERS' trading records for the Class Period;

(c) Reviewing GERS' trading records with Barrack, Rodos & Bacine and/or Plaintiffs' Lead Counsel for purposes of drafting and supporting the allegations in the complaints;

(d) Examining and approving the pleadings filed in this Action, including the initial complaint filed by GERS and the amended consolidated complaints;

(e) Participating in discovery by supervising GERS' employees' searching for and collecting relevant documents in response to Defendants' requests for production and providing information in response to interrogatories; and

(f) Communicating regarding settlement negotiations and evaluation of the settlement with Barrack, Rodos & Bacine and Plaintiffs' Lead Counsel.

8. To date, I estimate that I and other employees of GERS have spent at least 55 hours performing duties in support of GERS' role as a class representative.

9. Accordingly, GERS, through my and other employee's involvement, was both well-informed of the status and progress of the litigation and of any settlement negotiations. On behalf of GERS, I discussed the nature of the Settlement (including the Settlement Amount) with my counsel and approved their and Plaintiffs' Lead Counsel's recommendation.

10. Based on my involvement and other GERS' employees' involvement throughout the prosecution and resolution of the claims asserted in the Action, GERS 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 Barrack, Rodos & Bacine and GERS specified that the Action would be undertaken by Barrack, Rodos & Bacine and by Plaintiffs' Lead Counsel on a contingency basis, and that Plaintiffs' Counsel would apply to the Court for an award of counsel fees from the gross class-wide recovery, plus disbursements.

13. GERS has not received, nor has been promised or offered any financial incentive or compensation for serving as a Named Plaintiff in the Action. Nevertheless, GERS 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. GERS recognizes that the grant of such an award is entirely in the Court's discretion.

14. The amount of time that GERS' 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 and attending several meetings with counsel, reviewing correspondence, and reviewing and approving drafts of pleadings and other Court filings—was time that could have been dedicated to other activities. GERS' willingness to serve as class representative and its efforts on behalf of the Class were essential to obtaining this $86.4 million settlement for the benefit of all Class Members.

15. Accordingly, GERS 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. GERS 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. GERS 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, GERS 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 2nd day of October 2026, in St. Thomas, Virgin Islands.

Ishmael A. Meyers, Jr.