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 SCOTT MARTIN FILED ON BEHALF OF HAUSFELD LLP IN SUPPORT OF PLAINTIFFS' LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES

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

1. I am a Partner with the law firm Hausfeld LLP ("Hausfeld"). I am an attorney duly licensed to practice before the courts of the State of New York 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 Hausfeld and information received from Hausfeld attorneys and staff.

3. My firm has served as one of the Plaintiffs' Counsel and counsel of record for Plaintiff Manhattan and Bronx Surface Transit Operating Authority ("MaBSTOA") and Plaintiff Metropolitan Transportation Authority ("MTA") Defined Benefit Pnesion Plan Master Trust, who have served as named Plaintiffs in the above-captioned action (the "Action").

4. I am the partner who oversaw my firm's involvement in this Action. For purposes of this declaration, the schedule attached as Exhibit A summarizes the fee compensable time spent by Hausfeld'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. 256), 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. Hausfeld'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, including in numerous approved fee applications, as well as in direct hourly-billing (non-contingent) matters, in numerous instances at full "rack" (non-discounted) rates. For personnel no longer employed by Hausfeld, 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.

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

- Drafting, revising, and editing the complaint;
- Research related to the allegations of the complaint;
- Strategy and analysis related to the legal claims and allegations presented in the complaint;
- Research and drafting of sections of briefing in connection with defendants' dispositive motions;
- Strategy and analysis regarding appellate options; and
- Strategy and analysis regarding potential settlements.

7. The total time for which my firm is requesting an award of legal fees is 228.2 hours. The total lodestar value of these professional services is $203,974.00.

8. Attached as Exhibit B is a schedule of Hausfeld'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, Hausfeld incurred a total of $89.16 in expenses from June 1, 2020 through August 31, 2026. The schedule is based upon expense records recorded in Hausfeld'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 this 14th day of October, 2026, at New York, New York.

/s/ Scott Martin
Scott Martin

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
Scott Martin	P	42.7	$49,105.00	5	$1,550.00	$7,750.00	47.7	$56,855.00
Michael Lehmann	P	70.5	$81,075.00	0	$1,500.00	0	70.5	$81,075.00
Hillary Scherrer	P	24.2	$20,570.00	0	$1,125.00	0	24.2	$20,570.00
Jeanette Bayoumi	SA	70.7	$37,471.00	15.10	$530.00	$8,003.00	85.8	$45,474.00
TOTAL:		**208.1**	**$188,221.00**	**20.1**		**$15,753**	**228.2**	**$203,974.00**

Key: P = Partner SA = Staff Attorney

EXHIBIT B – Firm Expenses

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

Expense Categories	Expenses
Computer Research/Databases	$89.16
TOTAL	**$89.16**