

# **Exhibit A**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<b>IN RE EUROPEAN GOVERNMENT BONDS ANTITRUST LITIGATION</b>	Lead Case No. 19-cv-2601  Hon. Victor Marrero
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**DECLARATION OF DARYL F. SCOTT IN SUPPORT OF PLAINTIFFS' MOTION  
FOR AN INTERIM AWARD OF ATTORNEYS' FEES AND  
REIMBURSEMENT OF EXPENSES  
ON BEHALF OF SCOTT+SCOTT ATTORNEYS AT LAW LLP**

I, Daryl Scott, declare and state as follows:

1. I am a partner at the law firm Scott+Scott Attorneys at Law LLP. I submit this Declaration in support of Plaintiffs' Motion for an Interim Award of Attorneys' Fees and Reimbursement of Expenses in connection with time spent and expenses incurred by my firm in connection with this litigation.

2. On April 26, 2019, the Court appointed Labaton Sucharow LLP, Scott+Scott Attorneys at Law LLP, and Lowey Dannenberg P.C. as interim co-lead counsel ("Co-Lead Counsel") for the proposed class in the above-captioned action (the "Litigation"). ECF No. 32. On April 23, 2021, the Court appointed Berman Tabacco as additional interim Co-Lead Counsel for the proposed class. ECF No. 200. On March 8, 2022, the Court granted DiCello Levitt LLC's motion to amend the appointment of Co-Lead Counsel to substitute DiCello Levitt for Labaton Sucharow. ECF No. 235.

3. My firm's submission of its time and expenses in this Declaration adheres to the reporting protocols established by Co-Lead Counsel on May 23, 2019.

4. My firm's work on behalf of Plaintiffs includes the following: originating the case, including pre-filing and continuing case investigation; drafting the complaint and the amended complaints; briefing leadership motions and case management issues; participating in meetings of Co-Lead Counsel; opposing motions to dismiss; mediating, negotiating, and drafting settlement agreements and obtaining preliminary approval therefore; obtaining discovery from Defendants including document productions and transaction data; obtaining cooperation from Settling Defendants including document productions and transaction data; coordinating document review; developing the plan of distribution in consultation with experts in class action notice and allocation plans, and obtaining preliminary approval therefor; liaising with the claims administrator in navigating the settlement process; and, engaging and working with experts and consultants on numerous aspects of the case. The specifics of the work performed by my firm are set forth in the concurrently-filed Joint Declaration of Kristen M. Anderson, Gregory S. Ascioffa, Vincent Briganti, and Todd A. Seaver in Support of Motion for Final Approval of Settlements and Motion for an Interim Award of Attorneys' Fees and Reimbursement of Expenses.

5. Exhibit 1 sets forth the time spent by partners, attorneys, and support staff of my firm, from inception of the Litigation through May 16, 2023. The billing rates for the partners, attorneys, and support staff align with the firm's standard billing rates for contingent cases. In instances where personnel are no longer employed by my firm, lodestar calculations are based on their final-year billing rates during their tenure with us.

6. The hours spent by my firm from the inception of the Litigation through May 16, 2023 totals 5,463.1. The firm's lodestar totals \$4,583,181.00. Total hours were calculated through an examination of contemporaneous time records regularly prepared and maintained by my firm. I have reviewed the accuracy of these time records and their relevance and have concluded they

are reasonable and necessary for the prosecution of the Litigation. While conducting this review, I made adjustments to align certain entries with the reporting protocol established in this Litigation, as well as to adhere to the firm's policies and procedures. These adjustments were not only consistent with the firm's best practices but also beneficial to the class.

7. Exhibit 2 sets forth the unreimbursed expenses my firm incurred in prosecuting the Litigation from inception through May 16, 2023.

8. These unreimbursed expenses, incurred on behalf of the Plaintiffs, are accurately reflected on the books and records of my firm and were prepared from expense vouchers, check records, and other source materials.

9. To facilitate the sharing of expenses, Co-Lead Counsel contributed to a litigation fund administered by my firm. Exhibit 3 sets forth paid or incurred expenses by the litigation fund, which was fully funded by Co-Lead Counsel, from inception of the Litigation through May 16, 2023, totaling \$691,721.89.

I declare under penalty of perjury, under the laws of the United States of America, that to the best of my knowledge, the foregoing is true and correct.

Executed on this 27th day of October, 2023 at Glen Allen, Virginia.

  
Daryl F. Scott

**EXHIBIT 1 – S+S Time & Lodestar**

**Case Name:** *In re European Government Bonds Antitrust Litig.*, No. 19-cv-2601  
**Firm Name:** Scott+Scott Attorneys at Law LLP  
**Relevant Period:** Inception of action through May 16, 2023

<b>PROFESSIONAL</b>	<b>STATUS</b>	<b>HOURLY RATE</b>	<b>TOTAL HOURS</b>	<b>TOTAL LODESTAR AT HOURLY RATES</b>
David Scott	P	\$1,595	70.00	\$ 111,650.00
Daryl Scott	P	\$1,495	79.50	\$ 118,852.50
Christopher Burke	P	\$1,395	514.50	\$ 717,727.50
Donald Broggi	P	\$1,395	289.00	\$ 403,155.00
Joseph Guglielmo	P	\$1,395	36.80	\$ 51,336.00
Amanda Lawrence	P	\$1,095	47.20	\$ 51,684.00
Kristen Anderson	OC	\$1,050	806.70	\$ 847,035.00
Patrick Coughlin	OC	\$1,595	126.40	\$ 201,608.00
Daniel Brockwell	A	\$520	924.40	\$ 480,688.00
Justin Batten	A	\$550	254.00	\$ 139,700.00
Kate Lv	A	\$675	37.50	\$ 25,312.50
Michelle Conston	A	\$695	1,094.00	\$ 760,330.00
Patrick Rodriguez	A	\$625	844.60	\$ 527,875.00
J. Alex Vargas	I	\$675	23.50	\$ 15,862.50
Amy Weas	PL	\$395	18.00	\$ 7,110.00
Ellen Dewan	PL	\$415	205.30	\$ 85,199.50
Kimberly Jager	PL	\$415	21.50	\$ 8,922.50
Sumner Caesar	PL	\$415	70.20	\$ 29,133.00
<b>TOTAL</b>			<b>5,463.1</b>	<b>\$ 4,583,181.00</b>

**EXHIBIT 2 – S+S Expenses**

**Case Name:** *In re European Government Bonds Antitrust Litig.*, No. 19-cv-2601  
**Firm Name:** Scott+Scott Attorneys at Law LLP  
**Relevant Period:** Inception of action through May 16, 2023

<b>EXPENSE</b>	<b>AMOUNT</b>
Courier	\$ 977.34
Filing, Witness & Other Fees	\$ 1,187.63
On-Line Research	\$ 6,129.71
Photocopies	\$ 5,642.25
Postage	\$ 0.50
Telephone, Facsimile	\$ 1,955.16
Travel (Meals, Hotels & Transportation)	\$ 21,323.06
<b>TOTAL</b>	<b>\$ 37,215.65</b>

**EXHIBIT 3 – Litigation Fund Contributions & Expenses****Case Name:** *In re European Government Bonds Antitrust Litig.*, No. 19-cv-2601**Relevant Period:** Inception of litigation fund through May 16, 2023

## Litigation Fund Expenses

<b>EXPENSE CATEGORY</b>	<b>AMOUNT</b>
Bank and Wire Fees	\$1,797.98
Experts/Consultants	\$631,307.76
Mediation Fees	\$12,000.00
Service of Process and Translation Fees	\$46,616.15
<b>TOTAL</b>	<b>\$691,721.89</b>

# **Exhibit B**



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<b>IN RE EUROPEAN GOVERNMENT BONDS ANTITRUST LITIGATION</b>	Lead Case No. 19-cv-2601  Hon. Victor Marrero
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**DECLARATION OF GREGORY S. ASCIOLLA IN SUPPORT OF PLAINTIFFS’  
MOTION FOR AN INTERIM AWARD OF ATTORNEYS’ FEES AND  
REIMBURSEMENT OF EXPENSES ON BEHALF OF DICELLO LEVITT LLP**

I, Gregory S. Ascioffa, declare and state as follows:

1. I am a partner at the law firm DiCello Levitt LLP. I submit this Declaration in support of Plaintiffs’ Motion for an Interim Award of Attorneys’ Fees and Reimbursement of Expenses in connection with services rendered and expenses incurred by my firm in connection with this litigation.

2. On April 26, 2019, the Court appointed Labaton Sucharow LLP, Scott+Scott Attorneys at Law LLP, and Lowey Dannenberg P.C. as interim co-lead counsel for the proposed class in the above-captioned action (the “Action”). ECF No. 32. On April 23, 2021, the Court appointed Berman Tabacco as additional interim co-lead counsel for the proposed class. ECF No. 200. On March 8, 2022, the Court granted DiCello Levitt LLP’s motion to amend the appointment of co-lead counsel to substitute DiCello Levitt for Labaton Sucharow. ECF No. 235.

3. My firm has abided by the established time and expense reporting protocol dated May 23, 2019 and effective since inception of the case. My firm’s submission of its compensable time and reimbursable expenses in this Declaration and its exhibits comports with this time and expense reporting protocol.

4. My firm has been involved in the following activities on behalf of Plaintiffs:

- Drafting consolidated and amended complaints and conducting related research for claims therein;
- Working with experts to develop the claims and facts;
- Managing and organizing the case, including status reports, protocols and case management orders;
- Participating in strategy meetings of Co-Lead Counsel;
- Opposing Defendants' motions to dismiss and for reconsideration, including related factual and legal research;
- Mediating, negotiating, and drafting settlement term sheets and settlement agreements;
- Drafting materials related to preliminary approval of settlements, including notices and plans of distribution;
- Obtaining and reviewing discovery from Settling Defendants, including document productions and transaction data; and
- Obtaining cooperation from Settling Defendants, including document productions and transaction data.

5. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the partners, attorneys, and other professional support staff of my firm in this litigation, from March 7, 2022 through May 16, 2023. The hourly rates for the partners, 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.

6. The total number of hours expended on this litigation by my firm from March 7, 2022 through May 16, 2023, is 942.40 hours. The total lodestar for my firm from March 7, 2022 through May 16, 2023 is \$906,253.50. The total hours were determined by the examination of contemporaneous, daily time records regularly prepared and maintained by my firm.

7. As detailed in Exhibit 2, my firm has incurred a total of \$2,874.20 in unreimbursed expenses during the period from March 7, 2022 through May 16, 2023. In addition to the unreimbursed expenses set forth in Exhibit 2, my firm contributed to a litigation fund administered by Scott+Scott. Exhibit 3 to the Daryl F. Scott declaration sets forth the total expenses paid or incurred by the litigation fund, which was fully funded by Co-Lead Counsel.

8. The unreimbursed expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials and represent an accurate record of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 30th day of October, 2023 at New York, New York.

*/s/ Gregory S. Ascioffa*  
\_\_\_\_\_  
Gregory S. Ascioffa

**EXHIBIT 1**  
**IN RE EUROPEAN GOVERNMENT BONDS ANTITRUST LITIGATION**  
**TIME REPORT**  
**Firm Name: DiCello Levitt LLP**  
**Reporting Period: March 7, 2022 - May 16, 2023**

<b>ATTORNEYS</b>	<b>TOTAL HOURS</b>	<b>HOURLY RATE</b>	<b>TOTAL LODESTAR</b>
Gregory Ascioffa (P)	230.30	\$ 1,210.00	\$278,663.00
Matthew Perez (P)	312.70	\$ 1,110.00	\$347,097.00
Brian Hogan (P)	29.90	\$ 1,095.00	\$32,740.50
Veronica Bosco (A)	333.5	\$ 690.00	\$230,115.00
Karin Garvey (P)	1.90	\$ 1,210.00	\$2,299.00
Robin van der Meulen (P)	0.50	\$ 1,110.00	\$555.00
<b>SUB-TOTAL</b>	<b>908.80</b>		<b>\$891,469.50</b>
<b>NON-ATTORNEYS</b>			
Adrian Saldana (PL)	33.60	\$ 440.00	\$14,784.00
<b>SUB-TOTAL</b>	<b>33.60</b>		<b>\$14,784.00</b>
<b>GRAND TOTAL:</b>	<b>942.40</b>		<b>\$906,253.50</b>

(P) Partner  
(A) Associate  
(CL) Contract Lawyer  
(LC) Law Clerk  
(PL) Paralegal  
(O) Other Staff

**EXHIBIT 2**  
**IN RE EUROPEAN GOVERNMENT BONDS ANTITRUST LITIGATION**  
**EXPENSE REPORT**

**Firm Name: DiCello Levitt LLP**

**Reporting Period: March 7, 2022 - May 16, 2023**

<b>Disbursement</b>	<b>Total Amount</b>
Court Costs	\$236.00
Experts/consultants	\$0.00
Federal Express	\$0.00
Hearing Transcripts	\$0.00
Investigation	\$0.00
Lexis/Westlaw	\$2,577.20
Messenger/delivery	\$0.00
Photocopies - in House	\$0.00
Photocopies - Outside	\$0.00
Postage	\$0.00
Service of Process	\$0.00
Special Supplies	\$0.00
Telephone/telecopier	\$0.00
Travel	\$0.00
Miscellaneous	\$61.00
<b>TOTAL</b>	<b>\$2,874.20</b>

# **Exhibit C**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<b>IN RE EUROPEAN GOVERNMENT BONDS ANTITRUST LITIGATION</b>	Lead Case No. 19-cv-2601  Hon. Victor Marrero
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**DECLARATION OF VINCENT BRIGANTI IN SUPPORT OF  
PLAINTIFFS’ MOTION FOR AN INTERIM AWARD OF ATTORNEYS’ FEES AND  
REIMBURSEMENT OF EXPENSES ON BEHALF OF LOWEY DANNENBERG, P.C.**

I, Vincent Briganti, declare and state as follows:

1. I am the chairman and a shareholder at the law firm Lowey Dannenberg, P.C. (“Lowey”). I submit this Declaration in support of Plaintiffs’ Motion for an Interim Award of Attorneys’ Fees and Reimbursement of Expenses in connection with services rendered and expenses incurred by my firm in connection with this litigation.

2. On April 26, 2019, the Court appointed Labaton Sucharow LLP, Scott+Scott Attorneys at Law LLP, and Lowey as interim co-lead counsel for the proposed class in the above-captioned action (the “Action”). ECF No. 32. On April 23, 2021, the Court appointed Berman Tabacco as additional interim co-lead counsel for the proposed class. ECF No. 200. On March 8, 2022, the Court granted DiCello Levitt LLP’s motion to amend the appointment of co-lead counsel to substitute DiCello Levitt for Labaton Sucharow. ECF No. 235.

3. My firm has abided by the established time and expense reporting protocol dated May 23, 2019. My firm’s submission of its compensable time and reimbursable expenses in this Declaration and its exhibits comports with this time and expense reporting protocol.

4. My firm has been involved since the inception of this Action, including in the following activities on behalf of Plaintiffs:

- Research the structure of the European Government Bond market, including market integration across various issuers and other factors specific to this market;
- Research the internal corporate structure of primary dealers in European Government Bonds, including details concerning the process that each defendant uses to acquire bonds and bring them to the secondary markets;
- Work with economists experienced in detecting market manipulation to identify and obtain sufficiently robust data to analyze the economic impact of alleged manipulation of European Government Bonds;
- Distill the results of economic analyses into a format suitable for presentation in complaints;
- Analyze client data for exposure to and impact from alleged manipulation of European Government Bond prices;
- Research facts sufficient to demonstrate the relevant jurisdictional contacts created by each Defendant with respect to the U.S. market for European Government Bonds;
- Research potential legal claims and issues relating to the manipulation of European Government Bond prices;
- Research the structure of compliance and oversight systems at each Defendant;
- Confer and collaborate with Co-Lead Counsel regarding case strategy in order to ensure the efficient and effective prosecution of the case;
- Draft multiple Complaints outlining allegations and asserting claims on behalf of Plaintiffs and the Class;
- Engage in multiple meet-and-confers with Defendants on scheduling orders and various issues related to discovery, including legal issues involved with cross-border discovery, the preservation of documents, and other issues;
- Draft oppositions to multiple motions to dismiss and motions for reconsideration by Defendants;
- Draft motion to amend the pleadings;
- Research applicable class certification decisions to assist with case strategy, settlement negotiations, and the retention of experts;



- Confer with experts to determine damages caused by Defendants' alleged manipulation to assist with case strategy and settlement negotiations;
- Develop document review protocol;
- Prepare and serve requests for production of documents;
- Prepare responses to Defendants' interrogatories and requests for the production of documents;
- Coordinate and assist with review of productions from Defendants and cooperation materials produced by Settling Defendants for use in amending pleadings, discovery, and case strategy;
- Draft and send correspondence to Defendants identifying deficiencies with or seeking clarification of discovery productions;
- Draft mediation statements and settlement presentations for the purpose of settlement discussions with State Street, JPMorgan, UniCredit, and Natixis;
- Prepare for and actively participate in extended settlement negotiations with State Street, JPMorgan, UniCredit, and Natixis;
- Draft settlement and class notice documents;
- Identify and work with settlement administrator to develop a class notice program for the State Street, JPMorgan, UniCredit, and Natixis settlements;
- Identify and work with consultants to develop a plan of distribution for settlement funds;
- Draft motions for preliminary settlement approval and approval of notice and distribution plan;
- Draft subpoenas to Defendants for settlement class member contact information;
- Meet and confer with Defendants regarding subpoenas for settlement class member contact information;
- Draft briefs opposing Deutsche Bank's and Rabobank's objections to the Natixis and UniCredit settlements and opposing Deutsche Bank's and Rabobank's motion to quash subpoenas directed at providing direct mail notice to the Class;
- Review correspondence from, and respond to, objector to State Street settlement; and

- Draft motion for final settlement approval.

5. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the attorneys and other professional support staff of my firm in this litigation, from inception of the case through May 16, 2023. 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 and non-contingent matters. Each timekeeper listed is or was a full-time employee of the firm. For personnel no longer employed by Lowey, the lodestar calculation is based on the billing rates for such personnel in his or her final year of employment. The time and lodestar incurred preparing this motion have been excluded, and Lowey's total lodestar does not include charges for expense items.

6. The total number of hours expended on this litigation by my firm from inception of the case through May 16, 2023, is 4,896.10 hours. The total lodestar for my firm is \$4,097,047.50. The total hours were determined by the examination of contemporaneous, daily time records regularly prepared and maintained by my firm. Lowey'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 my firm's practice. Accordingly, the time reflected in Lowey's fee compensable lodestar calculation is reasonable in amount and was necessary to prosecute the Action and achieve the settlements before the Court.

7. As detailed in Exhibit 2, my firm has incurred a total of \$33,846.81 in unreimbursed expenses during the period from inception of the case through May 16, 2023. In addition to the unreimbursed expenses set forth in Exhibit 2, Lowey contributed to a litigation fund administered by Scott+Scott. Exhibit 3 to the Daryl F. Scott declaration sets forth the total expenses paid or incurred by the litigation fund, which was fully funded by Co-Lead Counsel.

8. The unreimbursed expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials and represent an accurate record of the expenses incurred. Expense items are billed separately, and such charges are not duplicated in the firm's current billing rates. Further, expense items do not contain any general overhead costs and do not contain a surcharge over the amount paid to the corresponding vendor(s).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 30th day of October 2023 at White Plains, New York.

  
\_\_\_\_\_  
Vincent Briganti

## EXHIBIT 1

ATTORNEYS	ROLE	TOTAL HOURS	HOURLY RATE	TOTAL LODESTAR
Geoffrey Horn	(S)	51.30	\$ 1,395.00	\$ 71,563.50
Vincent Briganti	(S)	1,009.10	\$ 1,395.00	\$ 1,407,694.50
Christian Levis	(P)	105.90	\$ 1,090.00	\$ 115,431.00
Raymond Girnys	(P)	35.70	\$ 1,090.00	\$ 38,913.00
Sitso Bediako	(P)	55.10	\$ 1,090.00	\$ 60,059.00
Barbara Hart	(P)	37.50	\$ 980.00	\$ 36,750.00
Peter Barile III	(O)	3.50	\$ 970.00	\$ 3,395.00
Andrea Farah	(SA)	1.90	\$ 970.00	\$ 1,843.00
Frank Strangeman	(SA)	11.20	\$ 775.00	\$ 8,680.00
Johnathan Serebinski	(SA)	11.30	\$ 775.00	\$ 8,757.50
Roland St. Louis	(A)	1,540.70	\$ 775.00	\$ 1,194,042.50
Jennifer Tembeck	(SA)	449.00	\$ 700.00	\$ 314,300.00
Anthony Christina	(A)	45.30	\$ 700.00	\$ 31,710.00
Charles Kopel	(A)	737.70	\$ 560.00	\$ 413,112.00
Ian Sloss	(A)	431.80	\$ 550.00	\$ 237,490.00
Alessandra Greco	(A)	8.00	\$ 525.00	\$ 4,200.00
Luke Goveas	(A)	21.20	\$ 525.00	\$ 11,130.00
Yuanchen Lu	(A)	2.50	\$ 525.00	\$ 1,312.50
Sylvie Bourassa	(A)	16.30	\$ 495.00	\$ 8,068.50
Christopher DeVivo	(A)	37.00	\$ 490.00	\$ 18,130.00
Bracha Gefen	(A)	18.00	\$ 460.00	\$ 8,280.00
Henry Kusjanovic	(A)	32.00	\$ 430.00	\$ 13,760.00
Mitsuka Attys	(A)	21.50	\$ 430.00	\$ 9,245.00
Amir Alimehri	(A)	7.50	\$ 410.00	\$ 3,075.00
Lee Yun Kim	(A)	6.50	\$ 410.00	\$ 2,665.00
Christina McPhaul	(A)	1.00	\$ 400.00	\$ 400.00
Tim Rode	(A)	65.50	\$ 390.00	\$ 25,545.00
Matthew Roberts	(A)	2.00	\$ 370.00	\$ 740.00
Anthony Odorisi	(A)	106.20	\$ 365.00	\$ 38,763.00
Julia McGrath	(A)	9.70	\$ 365.00	\$ 3,540.50
<b>SUBTOTAL</b>		<b>4,881.90</b>		<b>\$ 4,092,595.50</b>

NON-ATTORNEYS				
Katherine Vogel	(PL)	8.30	\$ 365.00	\$ 3,029.50
Myra Fromholz	(PL)	0.40	\$ 365.00	\$ 146.00
Melonie Penrhyn	(PL)	1.70	\$ 315.00	\$ 535.50
Maribel Valentin	(PL)	3.80	\$ 195.00	\$ 741.00
<b>SUBTOTAL</b>		<b>14.20</b>		<b>\$ 4,452.00</b>
<b>GRAND TOTAL:</b>		<b>4,896.10</b>		<b>\$ 4,097,047.50</b>

## Key:

(S) Shareholder

(P) Partner

(O) Of Counsel

(SA) Senior Associate

(A) Associate

(PL) Paralegal

**EXHIBIT 2**

<b>Disbursement</b>	<b>Total Amount</b>
Experts/consultants	\$3,377.50
Federal Express	\$74.87
Lexis/Westlaw	\$6,013.03
Photocopies - in House	\$1,299.29
Postage	\$1.50
Telephone/telecopier	\$129.81
Travel	\$567.19
Discovery/Document Hosting/Management	\$22,383.62
<b>TOTAL</b>	<b>\$33,846.81</b>

# **Exhibit D**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<b>IN RE EUROPEAN GOVERNMENT BONDS ANTITRUST LITIGATION</b>	Lead Case No. 19-cv-2601  Hon. Victor Marrero
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**DECLARATION OF TODD A. SEAVER IN SUPPORT OF PLAINTIFFS’ MOTION  
FOR AN INTERIM AWARD OF ATTORNEYS’ FEES AND REIMBURSEMENT OF  
EXPENSES ON BEHALF OF BERMAN TABACCO**

I, Todd A. Seaver, declare and state as follows:

1. I am a partner with the law firm Berman Tabacco. I submit this Declaration in support of Plaintiffs’ Motion for an Interim Award of Attorneys’ Fees and Reimbursement of Expenses in connection with services rendered and expenses incurred by my firm in connection with this litigation.

2. On April 26, 2019, the Court appointed Labaton Sucharow LLP, Scott+Scott Attorneys at Law LLP, and Lowey Dannenberg P.C. as interim co-lead counsel for the proposed class in the above-captioned action (the “Action”). ECF No. 32. On April 23, 2021, the Court appointed Berman Tabacco as additional interim co-lead counsel for the proposed class. ECF No. 200. On March 8, 2022, the Court granted DiCello Levitt LLP’s motion to amend the appointment of co-lead counsel to substitute DiCello Levitt for Labaton Sucharow. ECF No. 235.

3. My firm is counsel of record for San Bernardino County Employee Retirement Association (SBCERA”) who serves as a named plaintiff in this action.

4. My firm has abided by the established time and expense reporting protocol dated May 23, 2019 and effective since inception of the case. My firm’s submission of its compensable

time and reimbursable expenses in this Declaration and its exhibits comports with this time and expense reporting protocol.

5. My firm has been involved in the following activities on behalf of Plaintiffs:

- SBCERA joined this action and was added as a party-plaintiff upon the filing of the Fourth Amended Complaint on February 9, 2021. I and other Berman Tabacco attorneys have advised and counseled SBCERA, including at board meetings, regarding all material aspects of the litigation. I, other Berman Tabacco attorneys, and financial analysts employed by the firm collected data and documents from SBCERA and analyzed transaction and counterparty information. SBCERA transactions were alleged in the Fourth Amended Complaint to establish antitrust standing to sue multiple defendants.
- Berman Tabacco has contributed to all strategic matters in conjunction with our fellow Co-Lead Counsel, including investigations, research, and drafting concerning the Fourth Amended Complaint and the Fifth Amended Complaint; research and drafting the opposition to Defendants' motions to dismiss the Fourth Amended Complaint, motions for reconsideration, and motion for leave to file the Fifth Amended Complaint;
- The firm has participated in settlement negotiations and contributed to the drafting of settlement documents;
- I and other Berman Tabacco attorneys have engaged in numerous discovery conferences and related legal research and correspondence with defendants' counsel regarding responses to plaintiffs' document requests;
- Attorneys at my direction have reviewed and analyzed documents and information produced by defendants and settled parties in this action. In particular, analysis of chatroom communications by bond traders were analyzed by Berman Tabacco attorneys and work product from the analysis developed for use in the amended complaints and in preparation for trial.

6. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the partners, attorneys, and other professional support staff of my firm in this litigation, from inception of the case through May 16, 2023. The hourly rates for the partners, 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.



7. The total number of hours expended on this litigation by my firm from inception of the case through May 16, 2023, is 2,534.50 hours. The total lodestar for my firm is \$1,675,867.00. The total hours were determined by the examination of contemporaneous, daily time records regularly prepared and maintained by my firm.

8. As detailed in Exhibit 2, my firm has incurred a total of \$2,750.32 in unreimbursed expenses during the period from inception of the case through May 16, 2023. In addition to the unreimbursed expenses set forth in Exhibit 2, my firm contributed to a litigation fund administered by Scott+Scott. Exhibit 3 to the Daryl F. Scott declaration sets forth the total expenses paid or incurred by the litigation fund, which was fully funded by Co-Lead Counsel.

9. The unreimbursed expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials and represent an accurate record of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 30th day of October, 2023 at San Francisco, California.

/s/ Todd A. Seaver

Todd A. Seaver

## IN RE EUROPEAN GOVERNMENT BONDS ANTITRUST LITIGATION

## TIME REPORT

Firm Name: BERMAN TABACCO

Reporting Period: Inception - May 16, 2023

<b>ATTORNEYS</b>	<b>TOTAL HOURS</b>	<b>HOURLY RATE</b>	<b>TOTAL LODESTAR</b>
Hammarskjold, Carl (P)	498.50	\$ 755.00	\$376,367.50
Lavallee, Nicole (P)	24.80	\$ 1,150.00	\$28,520.00
McGrath, Sarah (A)	1350.30	\$ 595.00	\$803,428.50
Sarraf, Christina (A)	269.40	\$ 430.00	\$115,842.00
Seaver, Todd (P)	215.20	\$ 1,045.00	\$224,884.00
Stern, Leslie (P)	17.50	\$ 1,120.00	\$19,600.00
Tabacco, Joseph (P)	40.20	\$ 1,170.00	\$47,034.00
			\$0.00
<b>SUB-TOTAL</b>	<b>2415.90</b>		<b>\$1,615,676.00</b>
<b>NON-ATTORNEYS</b>			
Becker, Kathy (PL)	5.80	\$ 510.00	\$2,958.00
Misra, Jessica (O)	64.80	\$ 590.00	\$38,232.00
Segura, Beto (PL)	36.10	\$ 410.00	\$14,801.00
Scarsciotti, Jeannine (O)	2.00	\$ 615.00	\$1,230.00
Soboleva, Yelena (PL)	9.90	\$ 300.00	\$2,970.00
			\$0.00
<b>SUB-TOTAL</b>	<b>118.60</b>		<b>\$60,191.00</b>
<b>GRAND TOTAL:</b>	<b>2534.50</b>		<b>\$1,675,867.00</b>

(P) Partner  
(A) Associate  
(CL) Contract Lawyer  
(LC) Law Clerk  
(PL) Paralegal  
(O) Other Staff

**EXHIBIT 1**

**IN RE EUROPEAN GOVERNMENT BONDS ANTITRUST LITIGATION  
EXPENSE REPORT**

**Firm Name: BERMAN TABACCO**

**Reporting Period: Inception - May 16, 2023**

<b>Disbursement</b>	<b>Total Amount</b>
Court Costs	\$635.00
Federal Express	\$140.80
Lexis/Westlaw	\$1,049.16
Messenger/delivery	\$15.00
Photocopies - in House	\$75.84
Postage	\$0.57
Service of Process	\$116.40
Travel	\$290.25
Miscellaneous (Pacer)	\$427.30
<b>TOTAL</b>	<b>\$2,750.32</b>

**EXHIBIT 2**

# **Exhibit E**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**IN RE EUROPEAN GOVERNMENT  
BONDS ANTITRUST LITIGATION**

Lead Case No. 19-cv-2601

Hon. Victor Marrero

**DECLARATION OF JONATHAN GARDNER IN SUPPORT OF  
PLAINTIFFS' MOTION FOR AN INTERIM AWARD OF ATTORNEYS' FEES AND  
REIMBURSEMENT OF EXPENSES ON BEHALF OF LABATON SUCHAROW LLP**

I, Jonathan Gardner, declare and state as follows:

1. I am a partner at the law firm Labaton Sucharow LLP. I submit this Declaration in support of Plaintiffs' Motion for an Interim Award of Attorneys' Fees and Reimbursement of Expenses in connection with services rendered and expenses incurred by my firm in connection with this litigation.

2. On April 26, 2019, the Court appointed Labaton Sucharow LLP, Scott+Scott Attorneys at Law LLP, and Lowey Dannenberg P.C. as interim co-lead counsel for the proposed class in the above-captioned action (the "Action"). ECF No. 32. On April 23, 2021, the Court appointed Berman Tabacco as additional interim co-lead counsel for the proposed class. ECF No. 200. On March 8, 2022, the Court granted DiCello Levitt LLP's motion to amend the appointment of co-lead counsel to substitute DiCello Levitt for Labaton Sucharow, given the departure of the attorneys working on this matter. ECF No. 235.

3. While Labaton Sucharow was interim co-lead counsel for the proposed class, the litigation was overseen and managed by other partners at my firm. As such, this Declaration is based on communications with my former partner Gregory Ascioffa, as well as review by me, and others at my direction, of Labaton Sucharow's business records, including contemporaneous time

records and expense reports. My firm has abided by the established time and expense reporting protocol dated May 23, 2019 and effective since inception of the case. My firm's submission of its compensable time and expenses in this Declaration and its exhibits comports with this time and expense reporting protocol.

4. From inception of the case through March 4, 2022, my firm was involved in the following activities on behalf of Plaintiffs:

- Investigating the facts and legal claims, and filing the first class action complaint;
- Drafting consolidated and amended complaints and conducting related research for claims therein;
- Working with experts to develop the claims and facts;
- Managing and organizing the case, including status reports and case management orders;
- Participating in strategy meetings of Co-Lead Counsel;
- Opposing Defendants' motions to dismiss, including related factual and legal research;
- Mediating, negotiating, and drafting settlement agreements and obtaining preliminary approval therefor;
- Obtaining discovery from Settling Defendants, including document productions and transaction data; and
- Obtaining cooperation from Settling Defendants, including document productions and transaction data.

5. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the partners, attorneys, and other professional support staff of my firm in this litigation, from inception of the case through March 4, 2022. The hourly rates for the partners, 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. For personnel who are no longer

employed by my firm, the lodestar calculation is based upon the rates for such personnel in his or her final year of employment by my firm.

6. The total reported number of hours expended on this litigation by my firm from inception of the case through March 4, 2022 is 1,212.70 hours. The total lodestar for my firm for this time is \$984,954.50. My firm's hours were determined by the examination of contemporaneous, daily time records regularly prepared and maintained by my firm.

7. As detailed in Exhibit 2, my firm has incurred \$6,594.83 in expenses during the period from inception of the case through March 4, 2022. In addition to the expenses set forth in Exhibit 2, my firm contributed to a litigation fund administered by Scott+Scott. Exhibit 3 to the Daryl F. Scott declaration sets forth the total expenses paid or incurred by the litigation fund, which was fully funded by Co-Lead Counsel and for which Co-Lead Counsel seek reimbursement on behalf of all contributors.

8. The expenses incurred in this Action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials and represent an accurate record of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 27th day of October, 2023 at New York, New York.

  
JONATHAN GARDNER

**IN RE EUROPEAN GOVERNMENT BONDS ANTITRUST LITIGATION****EXHIBIT 1****LODESTAR REPORT**

FIRM: LABATON SUCHAROW LLP

REPORTING PERIOD: INCEPTION THROUGH MARCH 4, 2022

<b>PROFESSIONAL</b>	<b>STATUS</b>	<b>HOURS</b>	<b>HOURLY RATE</b>	<b>LODESTAR</b>
Asciolla, G.	(P)	414.10	\$1,100	\$455,510.00
Himes, J.	(P)	86.50	\$1,100	\$95,150.00
Garvey, K.	(P)	31.80	\$975	\$31,005.00
McDonald, C.	(P)	10.20	\$925	\$9,435.00
Van Der Meulen, R.	(P)	10.60	\$825	\$8,745.00
Perez, M.	(OC)	366.50	\$700	\$256,550.00
Schervish II, W.	(OC)	13.80	\$650	\$8,970.00
Bosco, V.	(A)	87.80	\$525	\$46,095.00
Crevier, J.	(A)	16.60	\$525	\$8,715.00
Song, T.	(A)	61.70	\$425	\$26,222.50
Xu, D.	(LC)	22.50	\$375	\$8,437.50
Saldana, A.	(PL)	9.10	\$390	\$3,549.00
Redman, S.	(PL)	40.20	\$335	\$13,467.00
Ahn, E.	(RA)	33.10	\$355	\$11,750.50
Yellin, M.	(I)	8.20	\$165	\$1,353.00
<b>TOTALS</b>		<b>1212.70</b>		<b>\$984,954.50</b>

Partner	(P)	Research Analyst	(RA)
Of Counsel	(OC)	Investigator	(I)
Associate	(A)		
Law Clerk	(LC)		
Paralegal	(PL)		



***IN RE EUROPEAN GOVERNMENT BONDS ANTITRUST LITIGATION***

**EXHIBIT 2**

**EXPENSE REPORT**

FIRM: LABATON SUCHAROW LLP

REPORTING PERIOD: INCEPTION THROUGH MARCH 4, 2022

<b>CATEGORY</b>	<b>TOTAL AMOUNT</b>
Court Costs	\$1,194.00
Federal Express	\$14.80
Lexis/Westlaw	\$4,689.77
Duplicating	\$526.20
Long Distance Telephone/Telecopier	\$80.50
Work-Related Travel/Meals	\$89.56
<b>TOTAL</b>	<b>\$6,594.83</b>