#### 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	

## <u>DECLARATION OF STEVEN STRAUB ON BEHALF OF A.B. DATA, LTD.</u> REGARDING REQUESTS FOR EXCLUSION

Pursuant to 28 U.S.C. §1746, I, Steven Straub, declare:

- 1. I am the Senior Project Manager of Client Services of A.B. Data, Ltd.'s Class Action Administration Division ("A.B. Data"). I am over 21 years of age and am not a party to the above-captioned action (the "Action"). My business address is 600 A.B. Data Drive, Milwaukee, WI 53217, and my telephone number is 414-961-7551. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.
- 2. I submit this Declaration as a supplement to my earlier declaration, the Declaration of Steven Straub on Behalf of A.B. Data, Ltd. Regarding Notice and Claims Administration for Class Action Settlements with Barclays Capital Inc. and JPMorgan, dated September 9, 2021 (ECF No. 250) (the "Initial Mailing Declaration"), which provided the Court with information regarding the implementation of the notice plan.

#### **CONTINUED DIRECT MAIL NOTICE**

3. Since the execution of the Initial Mailing Declaration, A.B. Data has continued to disseminate copies of the Mailed Notice and the Claim Form (collectively, the "Notice Packet") in response to additional requests from potential Class Members and nominees. Through September 28, 2021, A.B. Data has mailed an additional 151 Notice Packets to potential Class

Members and nominees. In aggregate, A.B. Data has mailed 30,289 Notice Packets to potential Class Members and nominees.

#### **TOLL-FREE TELEPHONE LINE AND WEBSITE**

4. A.B. Data continues to maintain the case-specific toll-free number, 877-829-2941 and interactive voice response system to accommodate any inquiries from potential members of the Class. A.B. Data also continues to maintain the dedicated website for the Action, www.MGBAntitrustSettlement.com (the "Settlement Website"), in order to assist Class Members. On September 10, 2021, A.B. Data posted to the Settlement Website copies of the papers filed in support of Plaintiff's motion for final approval of Class Action Settlements with Barclays and JPMorgan and Lead Counsel's motion for an award of attorneys' fees and payment of expenses. A.B. Data will continue maintaining the Settlement Website and toll-free telephone number and, as appropriate, updating the Settlement Website until the conclusion of the administration.

#### REPORT ON REQUESTS FOR EXCLUSION RECEIVED

5. The Supplemental Notice and Settlement Website informed Settlement Class Members that Requests for Exclusion from the Settlement Class must be filed or mailed by September 23, 2021. As reported in the Initial Mailing Declaration, A.B. Data received one Request for Exclusion from the Settlement Class as of September 9, 2021. Since that date, A.B. Data has not received any additional Requests for Exclusion. Attached hereto as Exhibit A is a summary report of the Request for Exclusion.

#### REPORT ON REQUESTS FOR EXCLUSION RECEIVED

6. The Supplemental Notice and Settlement Website also informed potential Class Members that objections to the fairness, reasonableness, or adequacy of any term or aspect of the Settlement, Fee and Expense Application, or the Final Approval Order and Final Judgment were to be filed with the Court and served on Lead Counsel, Barclays' and JPMorgan's counsel no later

than September 23, 2021. As of the date of this Declaration, A.B. Data has not received any objections to the Settlements and knows of no other objections sent to Lead Counsel, Barclays' and JPMorgan's counsel.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 30, 2021, in Milwaukee, Wisconsin.

Steven Straub

# EXHIBIT A

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#### In re Mexican Government Bonds Antitrust Litigation No. 18-cv-02830 (JPO) (S.D.N.Y.)

#### **Exclusion Report**

		Postmark Date	Timely?		Telephone Number			Name of	Class Member Statement		Excluding from Barclays, JP Morgan, or both	
Hapoalim (Switzerland) Ltd	104066325	7/15/2021	Y	Υ	Y	Bank Hapoalim (Switzerland) Ltd, Bank Hapoalim (Switzerland) Ltd- Zurich Head Office, Bank Hapoalim (Switzerland) Ltd-Zurich Branch, Bank Hapoalim (Switzerland) Geneva Branch, Bank Hapoalim (Switzerland) Lusembourg Branch, Bank Hapoalim (Switzerland) Singapore Branch, and Hapoalim (Switzerland) Ltd, and all subsidiaries and branches	Υ	Y	Y	Y	вотн	Y