

**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

**[PROPOSED] ORDER AWARDING
REIMBURSEMENT OF LITIGATION EXPENSES**

This matter came for a duly noticed hearing on October 28, 2021 (the “Fairness Hearing”), upon Plaintiffs’ Lead Counsel’s Motion for an Award of Attorneys’ Fees and Payment of Litigation Expenses (“Fee and Expense Application”) in the above-captioned action (“Action”). The Court has considered the Fee and Expense Application and all supporting and other related materials, including the matters presented at the Fairness Hearing. Due and adequate notice of the Stipulation and Agreement of Settlement with Defendant Barclays PLC, Barclays Bank PLC, Barclays Capital Inc., Barclays Capital Securities Limited, Barclays Bank México, S.A., Institución de Banca Múltiple, Grupo Financiero Barclays México, and Grupo Financiero Barclays México, S.A. de C.V. (collectively, “Barclays”) entered into on March 27, 2020, and the Stipulation and Agreement of Settlement with Defendant JPMorgan Chase & Co., J.P. Morgan Broker-Dealer Holdings Inc., J.P. Morgan Securities LLC, JPMorgan Chase Bank, National Association, Banco J.P. Morgan, S.A. Institución de Banca Múltiple, J.P. Morgan Grupo Financiero, and J.P. Morgan Securities plc (collectively “JPMorgan”) also entered into on March 27, 2020 (the “Settlement Agreements”)¹ having been given to the Class Members, the Fairness

¹ Unless otherwise defined herein, all capitalized terms used have the meanings set forth and defined in the Settlement Agreements.

Hearing having been held, and the Court having considered all papers filed and proceedings held herein and otherwise being fully informed in the premises and good cause appearing therefore,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

1. This Court has personal jurisdiction over all Parties and all Class Members, as well as subject matter jurisdiction over the Action to approve the Settlement Agreements and all exhibits attached thereto.

2. Notice of the Fee and Expense Application was provided to potential Class Members in a reasonable manner, such notice complies with Rule 23(h)(1) of the Federal Rules of Civil Procedure and due process requirements.

3. Plaintiffs' Lead Counsel is hereby awarded \$ _____ in payment of Litigation Expenses, plus interest at the same rate as earned by the Settlement Fund, which shall be paid out of the Settlement Fund.

4. In the event that the Settlement is terminated or the Effective Date does not occur in accordance with the terms of the Settlement, this Order shall be null and void, of no further force or effect, and without prejudice to any of the Parties, and may not be introduced as evidence or used in any actions or proceedings by any Person against the Parties.

5. Pursuant to Section 5(D) of the Settlement Agreements, this expenses award is independent of the Court's consideration of the fairness, reasonableness, and adequacy of the Settlement and is also independent of the Court's consideration of the Distribution Plan.

6. The expenses award granted herein may be paid to Plaintiffs' Lead Counsel from the Settlement Fund immediately upon entry of this Order, subject to the terms, conditions, and obligations of the Settlement Agreements which terms, conditions, and obligations are incorporated herein.

7. There is no just reason for delay in the entry of this Order, and immediate entry by the Clerk of the Court is expressly directed.

IT IS SO ORDERED.

Date: _____

HONORABLE J. PAUL OETKEN
UNITED STATES DISTRICT JUDGE