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 NATACHA THOMAS 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, Natacha Thomas, Esq., 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 of Boston Retirement System, one of the Named Plaintiffs in this Action. As General Counsel, I am responsible for providing legal advice and representation

[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.

to Boston Resitement System in all litigation, including supervising Boston Retirement System's relationships with outside counsel.

3. The Boston Retirement System is a governmental defined benefit pension system. Boston Retirement System administesr retirement benefits to all employees of the City of Boston, as well as its autonomous agencies. We are the largest municipal retirement system in Massachusetts.

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

5. On behalf of Boston Retirement System, throughout the litigation I had regular communications with Wolf Haldenstein Adler Freeman & Herz LLP ("Wolf Haldenstein"), and understand that Lowey Dannenberg 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 Wolf Haldenstein 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 Wolf Haldenstein on case developments.

6. As a Named Plaintiff, I understood Boston Retirement System's 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 Plaintiffs' Lead Counsel in prosecuting the Action on behalf of the Class.

7. During the course of this litigation, I or other employees of Boston Retirement System, or City of Boston employees that support the Boston Retirement System, performed the following tasks, among others:

(a) gathering and preparing for production Boston Retirement System's trading records for the Class Period;

(b) reviewing Boston Retirement System's trading records with Wolf Haldenstein for purposes of drafting and supporting the allegations in the complaints;

(c) reviewing the pleadings filed in this Action, including the amended complaints;

(d) participating in discovery by searching for and collecting relevant documents in response to Defendants' requests for production and providing information in response to interrogatories;

(e) discussing settlement negotiations with Wolf Haldenstein and/or Plaintiffs' Lead Counsel.

8. While BRS staff do not track hours spent in overseeing litigation, I personally expended significant time engaging with outside counsel in preparing trading records for production and participating in discovery, as well as in discussing and overseeing settlement-related matters. Further, City of Boston employees supporting Boston Retirement System spent at least 28 hours performing duties in support of Boston Retirement System's role as a class representative.

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

10. Based on my involvement and other employees' involvement throughout the prosecution and resolution of the claims asserted in the Action, Boston Retirement System believes that the Settlement provides a fair, reasonable, and adequate recovery for the Class.

11. Boston Retirement System historically prefers to cap outside counsel at a fee of 29% in litigation of this kind. I understand that the remaining named plaintiffs have agreed to a fee for all Plaintiffs' Counsel's efforts in the Action in the amount of approximately 29.34% of the Settlement Fund. Boston Retirement System believes a fee in the amount of 29% is fair and reasonable.

12. At the outset of the engagement between Boston Retirement System and Wolf Haldenstein it was specified that the Action would be undertaken by Plaintiffs' Lead Counsel on a contingency basis, and that Plaintiffs' Lead Counsel would apply to the Court for an award of counsel fees from the gross classwide recovery, plus disbursements.

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

14. The significant amount of time that Boston Retirement System's staff and the supporting employees of the City of Boston devoted to the representation of the Class in this Action—including, among things, time spent actively participating in the discovery process, participating on calls with counsel, reviewing correspondence, and reviewing drafts of pleadings and other Court filings—was time that could have dedicated to other activities. Boston Retirement

System's willingness to serve as class representative and efforts on behalf of the Class were essential to obtaining this $86.4 million settlement for the benefit of all Class Members.

15. Accordingly, Boston Retirement System 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. Boston Retirement System 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. Boston Retirement System 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, Boston Retirement System also asks that the Court grant Plaintiffs' Lead Counsel's request for attorneys' fees and expenses in the amount of 29%, and the request for a Service Award.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 23rd day of November 2026, in Boston, Massachusetts.

Natacha Thomas, Esq., General Counsel