

**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 REGINA CALCATERRA
ON BEHALF OF CALCATERRA POLLACK LLP
IN SUPPORT OF PLAINTIFFS' LEAD COUNSEL'S MOTION FOR AWARD OF
ATTORNEYS' FEES AND PAYMENT OF EXPENSES**

I, Regina Calcaterra, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a partner with the law firm Calcaterra Pollack LLP (“Calcaterra Pollack”). I respectfully submit this Declaration in support of Plaintiffs’ Lead Counsel’s Motion for an Award of Attorneys’ Fees and Payment of Expenses in connection with the services rendered in the Action and the proposed class action settlements with Barclays and JPMorgan.

2. The statements herein are true to the best of my personal knowledge, information and belief based on the Calcaterra Pollack’s books and records and information received from its attorneys and staff.

3. This firm serves as one of the Plaintiffs’ Counsel and is counsel of record for the Manhattan and Bronx Surface Transit Operating Authority and the Metropolitan Transportation Authority Defined Benefit Pension Plan Master Trust who serve as named Plaintiffs in the Action.

4. I am the partner who oversaw my firm’s involvement in the Action. Calcaterra Pollack’s time records (including, where necessary, backup documentation) 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 either in the exercise of billing judgment or based on directions from Plaintiffs’ Lead Counsel or my firm’s practice. As a result of this review and related reductions, the time reflected in Calcaterra Pollack’s lodestar calculation was necessary to prosecute the Action and resolve the settlement before the Court. No expenses were submitted.

5. During the course of this litigation, and as detailed herein, Calcaterra Pollack worked on assignments that it was specifically directed to perform by Plaintiffs’ Lead Counsel.

6. Set forth below in ¶ 8 is a summary reflecting the amount of time (after any applicable reductions) Calcaterra Pollack’s attorneys and professional staff worked on the Action from April 2, 2020 (the launch of the firm) through May 31, 2020, and the corresponding lodestar value of that work. The schedule in ¶ 8 was prepared based upon daily time records maintained by Calcaterra Pollack attorneys and professional support staff in the ordinary course of business, and the lodestar calculations are based on the firm’s current hourly billing rates.

7. The services Calcaterra Pollack performed on behalf of the putative class include, but are not limited to, client correspondence, case management and review of proposed settlement documents.

8. Calcaterra Pollack’s total fee compensable time for which it seeks an award of attorneys’ fees is summarized below.

Attorneys	Role¹	Rates	Hours from inception to 5/31/2020	Lodestar from inception to 5/31/2020
Regina Calcaterra	P	\$900	16.0	\$14,400.00
Justin Teres	SA	\$655	23.7	\$15,523.50
TOTALS			39.70	\$29,923.50

9. The total time for which my firm is requesting an award of legal fees is 39.70 hours. The total lodestar value of these professional services is \$29,923.50.

10. The above hourly rates for Calcaterra Pollack’s attorneys and professional support staff are the firm’s current hourly rates. The hourly rates for attorneys and professional support staff in my firm are the same as the regular rates charged for their services in contingent fee

¹ “P” refers to Partners. “SA” refers to Senior Associates.

matters. Timekeepers with less than 15 hours were excluded. The time and lodestar spent preparing the Fee and Expense Application were also excluded from the above values.

11. The firm's lodestar figures do not include charges for expense items. 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).

12. Calcaterra Pollack did not incur any expenses from April 2, 2020, through May 31, 2020 for which the firm seeks to be reimbursed from the Settlement Fund.

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

Executed on July 22, 2021
New York, NY



Regina Calcaterra
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