## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SUCESORES DE DON CARLOS NUÑEZ Y DOÑA PURA GALVEZ, INC.; MYRIAM E. NUÑEZ, as Personal Representative and Executor of the ESTATE OF NESTOR FRANCISCO NUÑEZ GALVEZ; EILEEN DOMINGUEZ, as Personal Representative and Executor of the ESTATE OF BLANCA NUÑEZ: GLORIA TORRALBAS NUÑEZ; GLORIA PILAR MOLINA, as Personal Representative and Administrator of the ESTATE OF THOMAS TORRALBAS NUÑEZ; PURA AMERICA OCHOA NUÑEZ; NORKA CABANAS NUÑEZ; CARLOS CABANAS NUÑEZ; SILVIA NUÑEZ TARAFA; CARLOS NUÑEZ TARAFA; LOURDES NUÑEZ, as Personal Representative and Administrator of the ESTATE OF ALEJANDRO NUÑEZ TARAFA; CARLOS ARSENIO NUÑEZ **RIVERO**, as Personal Representative and Executor of the ESTATE OF CARIDAD MARIA RIVERO CABALLERO; and CARLOS ARSENIO NUÑEZ RIVERO,

Civil Action No. 1:20-cv-00851-KMW-KNF

Plaintiffs,

V.

SOCIÉTÉ GÉNÉRALE, S.A. and BNP PARIBAS, S.A.,

Defendants.

## **DECLARATION OF ALEX C. LAKATOS**

ALEX C. LAKATOS, pursuant to 28 U.S.C. § 1746, declares:

1. I am admitted to practice *pro hac vice* to the Bar of this Court and a partner with the law firm Mayer Brown LLP, attorneys for Defendant Société Générale, S.A. in the abovecaptioned matter. I submit this declaration in support of the Joint Memorandum of Law in Support of Defendants' Motion to Dismiss the Second Amended Complaint Pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).

2. Attached as Exhibit A is a true and correct copy of the Stockholders Agreement, dated May 24, 1997 concerning Sucesores de Don Carlos Nuñez y Doña Pura Galvez, Inc.

3. Attached as Exhibit B is a true and correct copy of Florida Secretary of State's records for Sucesores de Don Carlos Nuñez y Doña Pura Galvez, Inc.

Executed on the 2<sup>nd</sup> day of October 2020.

ALEX C. LAKATOS