

EXHIBIT F

- Assisted with the selection of experts and the gathering of documents for the expert reports of Art Kibbe;
- Reviewed and analyzed the reports of defendants' experts Moe and Schilling in preparation for plaintiffs' experts' reply reports; and
- Drafted sections of the memorandum and reply memorandum in support of plaintiffs' motion for class certification.

3. Exhibit 1 attached hereto is a summary of the time spent by my firm's attorneys and professional support staff who were involved in this litigation, and the lodestar calculation based on my firm's usual and customary hourly billing rates. The total number of hours expended by my firm from inception through this date is 1015.80 hours. The total lodestar for my firm is \$385,675.00.

4. The hourly rates for the partners, attorneys and professional support staff included in Exhibit 1 are the usual and customary current hourly rates charged for their services in non-contingent matters, which have been accepted and approved in other complex class action litigations. The exhibit was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

5. Exhibit 2 attached hereto is a summary by category of the unreimbursed expenses incurred by my firm in connection with the prosecution of this litigation. The expenses incurred in this action are reflected on my firm's books and records, which are prepared from invoices, receipts, credit card bills, cancelled checks and wire transfer notices, expense vouchers, check records, and other source materials and represent an accurate recordation of the expenses incurred. The total expenses incurred by my firm are \$44,937.90.

6. Exhibit 3 sets forth the biographies of the principal attorneys from my firm who were involved in this case.

HILLIARD & SHADOWEN LLP


Steve D. Shadowen

Dated: March 18, 2014

EXHIBIT 1**DORYX ANTITRUST LITIGATION
TIME REPORT****Firm Name: Hilliard & Shadowen LLP****Reporting Period: July 2012-November 13, 2013**

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Steve D. Shadowen	P	2.0	\$800.00	\$1,600.00
Anne K. Fornecker	A	527.4	\$500.00	\$263,700.00
Matthew Weiner	A	461.9	\$250.00	\$115,475.00
Daniela Ritchie	PL	6.5	\$200.00	\$1,300.00
Andrew Clearfield	LC	18.0	\$200.00	\$3,600.00
TOTALS		1015.80		\$385,675.00

P = Partner

C = Counsel

A = Associate

LC = Law Clerk

PL = Paralegal

EXHIBIT 2**DORYX ANTITRUST LITIGATION
EXPENSE REPORT****Firm Name: Hilliard & Shadowen LLP****Reporting Period: July 2012-November 13, 2013**

EXPENSE	AMOUNT
Litigation Fund	\$40,000.00
Travel/Hotel/Meals	\$4,758.45
Copying Services	
Research Services	\$179.45
Telephone/Teleconference/Fax	
FedEx/Messengers/Postage	
Court Fees	
Other (describe)	
TOTAL	\$44,937.90

EXHIBIT 3

HILLIARD | SHADOWEN

39 W. Main St.
Mechanicsburg, PA 17055

919 Congress, Suite #1325
Austin, TX 78701

719 S Shoreline Blvd # 500,
Corpus Christi, TX 78401

Bob Hilliard and Steve Shadowen founded Hilliard Shadowen LLP in January 2012 to achieve a mutual goal: establish a team of experienced, resolute attorneys dedicated to the pursuit of economic and social justice for their clients. The firm has offices in Mechanicsburg, Pennsylvania; Austin, Texas; and Corpus Christi, Texas.

Although the law firm is newly formed, Mr. Hilliard's and Mr. Shadowen's partnership began over thirty years ago when they were college roommates and tennis teammates at St. Edward's University in Austin, Texas. After college, the future partners excelled independently at the profession both friends chose: the law. Over the years, they kept returning to the idea of litigating cases together, finally reaching the "now or never" moment at the beginning of 2012.

Hilliard Shadowen LLP is a natural extension of the legal work Mr. Hilliard and Mr. Shadowen had been doing separately for decades. Mr. Hilliard is a relentless advocate who has dedicated his thirty-year career as a trial attorney to representing the powerless against some of the nation's largest and wealthiest companies. Mr. Shadowen is a scholar and adjunct professor of law who has represented plaintiffs in complex antitrust litigation for more than twenty years. Together, the two attorneys apply their complementary skills and experience to achieve the best possible results for their clients. In addition to Messrs. Hilliard and Shadowen, the firm currently consists of six other distinguished attorneys, all of whom are discussed below.

STEVE D. SHADOWEN

Steve D. Shadowen, a founding partner of Hilliard Shadowen LLP, is regularly recognized as a top national antitrust lawyer, a result of his dedicated work on cases where intellectual property and antitrust law intersect, such as:

- *In re KDur Antitrust Litigation*: Mr. Shadowen won the Third Circuit argument that turned the tide for the plaintiffs in the pay-for-delay antitrust cases.
- *In re Cardizem CD Antitrust Litigation*: Mr. Shadowen won the first appellate case that ruled for plaintiffs on the pay-for-delay issue.
- *In re Brand-Name Prescription Drugs Antitrust Litigation*: Mr. Shadowen was lead counsel for the purchaser plaintiffs in the landmark litigation that began calling Big Pharma to account for anticompetitive conduct.
- *Abbott Labs. v. Teva Pharmaceuticals, U.S.A., Inc.*: Mr. Shadowen was on plaintiffs' trial team, and was one of the driving forces in the litigation, in the first case to accept the "product hopping" theory of anticompetitive conduct.

Other notable cases in which Mr. Shadowen has represented pharmaceutical purchasers include:

- *In re Relafen Antitrust Litigation*;
- *In re Androgel Antitrust Litigation (II)*;
- *In re Ciprofloxacin Hydrochloride Antitrust Litigation*;
- *King Drug Co. of Florence, Inc. v. Cephalon, Inc.*;
- *Meijer, Inc. v. Barr Pharmaceuticals, Inc.*;
- *In re Nifedipine Antitrust Litigation*;
- *In re Neurontin Antitrust Litigation*;
- *In re Remeron Antitrust Litigation*;
- *Safeway, Inc. v. Abbott Labs.*;
- *In re Terazosin Hydrochloride Antitrust Litigation*; and
- *In re Nexium (Esomeprazole Magnesium) Antitrust Litigation*.

Mr. Shadowen consistently garners recognition as a Best Lawyer in America for Antitrust and Commercial Litigation and as a Pennsylvania SuperLawyer. He serves on the advisory boards of the American Antitrust Institute and the Institute for Consumer Antitrust Studies and is an adjunct professor at the Pennsylvania State University Dickinson School of Law. Mr. Shadowen has published numerous papers on antitrust and civil rights issues and lectured on antitrust and competition law at universities across the nation and in Europe. He is a committed advocate for equal access to education, serving on the board of the Harrisburg Public Schools Foundation and as a trustee of St. Edward's University. Mr. Shadowen is also the President of the Joshua Group, an at-risk youth advocate organization.

Prior to starting Hilliard Shadowen LLP, Mr. Shadowen was a partner at the Philadelphia-based firms, Hangley Aronchick Segal & Pudlin, and Schnader Harrison Segal & Lewis, where he represented plaintiffs in antitrust litigation for more than 19 years.

As a law student he was the criminal procedure project editor of the Georgetown Law Journal. Upon graduation from Georgetown he served as a clerk for the Hon. Boyce F. Martin, Jr. of the United States Court of Appeals for the Sixth Circuit.

ROBERT C. HILLIARD

Robert C. Hilliard has been practicing law in the State of Texas for nearly 30 years, gaining national recognition for his work on many high-profile cases. He established Hilliard Muñoz Gonzales LLP in 1985 and Hilliard Shadowen LLP in 2012.

Mr. Hilliard's cases have made headlines statewide and on the national level. His representation of the parents of a Corpus Christi teenager who committed suicide following bullying incidents at his high school focused a national spotlight on the menace of bullying in schools. He led the fight for justice for disabled residents of the Corpus Christi State School who were forced to take part in an infamous "fight club" for the amusement of some staff members. Mr. Hilliard's other high-profile cases include:

- the 2010 fatal shooting of a 15-year-old unarmed Mexican boy by a U.S. Border Control agent, which garnered international media attention
- the 2011 killing of another Mexican citizen by the Border Patrol, sparking a confrontation between President Calderon and Secretary of State Hillary Clinton
- helping free a Hmong man wrongfully convicted of criminal vehicular homicide in Minnesota. Mr. Hilliard was honored for his work on the case by the Innocence Project of Minnesota, receiving the organization's first "Never Forgotten Award." The Corpus Christi Caller-Times wrote, "Hilliard served charity and justice by intervening. His actions reflect positively on his profession and its capacity for defending and protecting the innocent." As a result Mr. Hilliard was a 2011 finalist for Public Justice's National Trial Lawyer of the Year. An award that recognized that "Mr. Hilliard, as a trial lawyer, takes great risks and overcomes incredible odds to advance the common law, to make new law, and to win justice for their clients and for the common good of the public."
- serving as liaison counsel for the Plaintiffs' Steering Committee against Toyota for the widely-reported unintended acceleration litigation
- fighting for victims of the FEMA Trailer Formaldehyde incidents
- achieving \$13.5 million in combined verdicts in a predatory lending case
- acting as lead counsel in a class action suit against H&R Block, which resulted in a rapid refund to approximately 300,000 Texans

Mr. Hilliard's passion for helping those who have been wronged is personal. His older brother, Del, was born with Muscular Dystrophy. "From the earliest days, I saw how mean people could be to those perceived as weak or vulnerable," Mr. Hilliard told a reporter with NSIDE Magazine in 2011. "Del died unexpectedly in 2009, and if anything, his death has made me more determined to protect and help those who have suffered."

Mr. Hilliard received his undergraduate degree in English literature from St. Edward's University in Austin, Texas where he graduated summa cum laude. In 1983, he graduated with honors from St. Mary's Law School in San Antonio where he served as the associate editor of the St. Mary's Law Journal. Upon receiving his Juris Doctor degree, Mr. Hilliard began his legal career at the Law Offices of Guy Allison in Corpus Christi.

Mr. Hilliard has been featured on ABC World News Tonight, Good Morning America, FOX News, 60 Minutes and other national and international media. A 2011 cover story in NSIDE magazine called Mr. Hilliard, "The Champion." That same year, Texas Super Lawyers magazine featured an article about him entitled, "The Bulldog."

JACK. A. STAPH

Jack A. Staph has more than 40 years of experience litigating and advising clients in the pharmaceutical industry. From 1986 to 1997, he served as Senior Vice President, Secretary and General Counsel of the Revco Drugstore pharmacy chain. He first joined the Revco legal department in 1972.

Mr. Staph counseled his client and oversaw its litigation through some of the most momentous changes in the pharmaceutical industry. His experience includes providing counseling and

overseeing litigation involving pharmacy provider contracts, managed care contracts, restricted pharmacy provider networks, HIPPA compliance, anti-kickback compliance, drug formulary compliance and medication adherence programs. He also directed Revco's litigation against pharmaceutical manufacturers for unlawful price-fixing, market allocation and other anticompetitive practices. In addition, Mr. Staph has years of significant experience managing oversight of all merger and acquisition work, corporate governance, negotiation of collective bargaining agreements and employment litigation.

Mr. Staph serves as the Chairman and President of Cleveland Marathon Inc. and Executive Director of the Rite Aid Cleveland Marathon. For Cleveland Marathon Charities, a 501(c)3 that raises millions of dollars for charities throughout the country, Mr. Staph serves as President. For his service to the Cleveland Marathon, including more than 30 years as its race chairman, Mr. Staph was inducted into the Greater Cleveland Sports Hall of Fame.

He also serves in many other leadership positions in various for-profit and civic organizations, including:

- National Advisory Council, Cleveland State Law School;
- Director, Elder-Beerman Stores Corp.;
- Director, Delta Holdings, Inc.;
- Trustee, The Revco Golf Charities Foundation;
- Trustee, Parkworks;
- Trustee, Judson Retirement Community; and
- Director, Running USA.

ELIZABETH G. ARTHUR

Elizabeth G. Arthur is a former Assistant Attorney General in the Antitrust Division of the Florida Office of the Attorney General and has focused her practice for over ten years on antitrust enforcement primarily in the pharmaceutical industry. For the past six and a half years she served as the co-chair of the Pharmaceutical Industry Working Group for the National Association of Attorneys General. Ms. Arthur was the lead attorney for the States in the TriCor litigation. She gave the Spotlight Address on the TriCor case and Life Cycle Management at the 5th Annual In-House Counsel Forum on Pharmaceutical Antitrust and presented at the FTC's Workshop on Antitrust Law and the Pharmaceutical Industry.

Ms. Arthur has been involved in numerous investigations of the pharmaceutical and health care industries and represented the State of Florida in numerous cases, including the following pharmaceutical cases:

- *State of Florida et al. v. Abbott Laboratories et al.*;
- *State of Florida v. Merck & Co.*;
- *State of Colorado et al. v. Warner Chilcott Holdings Company, III LTD et al.*;
- *States and Commonwealths of Texas et al. v. Organon USA Inc and Akzo Nobel N.V.*;
- *In Re Paxil Antitrust Litigation*;
- *In Re Relafen Antitrust Litigation*;

- *In re Buspirone Antitrust Litigation*; and
- *In Re Terazosin Hydrochloride Antitrust Litigation*.

Ms. Arthur graduated from the University of North Carolina at Chapel Hill with a BA in Economics and received her law degree from the University of Florida.

ANNE K. FORNECKER

Anne K. Fornecker has been litigating antitrust and consumer protection class actions for over ten years. Before joining Hilliard Shadowen LLP, she worked at a national class action litigation firm and a New York law firm that specialized in class action litigation.

Ms. Fornecker focuses her practice on pharmaceutical antitrust litigation and has served as counsel in such actions on behalf of both direct and indirect purchasers. She has assumed significant responsibility for all aspects of the litigation process, including discovery, briefing, class certification, and trial preparation, in a number of cases, including:

- *In re Relafen Antitrust Litigation*;
- *In re Remeron Antitrust Litigation*;
- *In re Tricor Antitrust Litigation*;
- *King Drug Co. of Florence, Inc. v. Cephalon, Inc.*;
- *Louisiana Wholesale Drug Co., Inc. v. Sanofi-Aventis*;
- *In re Androgel Antitrust Litigation*; and
- *In re Nexium Antitrust Litigation*.

She is admitted to practice in the State of Texas, the State of New York and the Southern and Eastern Districts of New York.

Ms. Fornecker graduated from Brooklyn Law School, cum laude, in 2002, where she was a member of the Brooklyn Law Review. She graduated from James Madison University, magna cum laude, in 1996.

DANIEL M. GONZALES

Daniel M. Gonzales joined Hilliard Shadowen LLP in 2013. Prior to joining the Firm, Mr. Gonzales was a member of the Energy and Utility Practice Group at one of the most prominent environmental law firms in Texas. As an associate in that Group for nearly three years, Mr. Gonzales represented large coalitions of cities in electric and natural gas rate proceedings; cities and utilities in certificate of convenience and necessity proceedings; and landowners affected by utility transmission line siting.

As an energy and utility attorney in Texas' developing deregulated energy market, Mr. Gonzales gained valuable first-hand experience addressing issues of unbundling of vertically integrated monopolies; barriers to entry for small utility competitors; market power in unregulated and semi-regulated markets; and assuring consumer protection. He has significant experience

conducting discovery in large commercial cases, as a second-chair trial lawyer, and as an appellate advocate.

Mr. Gonzales graduated from the University of Texas at Austin in 2006 with a BA in Philosophy and went on to graduate from the Texas Tech School of Law in 2010, where his article in the school's Administrative Law Journal was selected as the issue's "outstanding comment," and where he served on the Executive Committee of the Hispanic Law Students Association.

Mr. Gonzales is a member of the Hispanic Bar Association of Austin and the Austin Young Lawyers Association, and he enjoys volunteering with the Volunteer Legal Services of Central Texas. He is originally from Corpus Christi, Texas.

MATTHEW C. WEINER

Matthew C. Weiner graduated from The Pennsylvania State University, Smeal College of Business with a BA in Accounting. He then attended The Pennsylvania State University Dickinson School of Law, where he served as managing editor of the school's Yearbook on Arbitration and Mediation. He was also elected to coach Penn State's ABA National Moot Court team, and he competed in the Mardi Gras Sports Law Moot Court Competition.

While attending law school, Mr. Weiner served as a judicial intern for the United States District Court for the Western District of Pennsylvania. He had previously spent a summer as an intern for the Supreme Court of New York, Rockland Division.

Mr. Weiner has extensive research experience in antitrust, having served as a research assistant for a professor updating an antitrust treatise, and for another professor preparing a volume on antitrust law in the pharmaceutical industry. Other areas of particular interest include consumer class action litigation and mandated arbitration.

Mr. Weiner started working part-time for Hilliard Shadowen LLP during his last semester of law school, and joined the Firm full-time upon graduation. His practice concentrates on antitrust litigation and consumer protection in the pharmaceutical industry.

BRYCE DUKE

Bryce Duke brings his patent litigation background to Hilliard Shadowen where he focuses on antitrust and consumer protection class action litigation. Prior to joining Hilliard Shadowen, Mr. Duke worked as a civil litigation associate in East Texas, the hottest patent venue in the nation, where he helped represent a number of Fortune 500 companies in high-stakes patent litigation, often assisting in the research and drafting of key filings. His prior experience also includes complex litigation involving commodities and securities fraud, including a mass action commodities fraud case in which he conducted multiple depositions on behalf of one of the world's largest independently owned futures commission merchants. His working knowledge of how large entities operate and litigate informs his practice at Hilliard Shadowen.

Mr. Duke received dual degrees from the University of Texas, with honors, and went on to graduate, cum laude, from Baylor Law School, where he competed in multiple moot court competitions and served as a legal intern at the Texas House of Representatives. Mr. Duke is admitted to practice in the State of Texas and the Eastern and Southern Districts of Texas.

Mr. Duke is a member of the American Bar Association, the State Bar of Texas, the Texas Young Lawyers Association, and volunteers as a UIL Cross-Examination Debate Judge and in the Junior Achievement "Our Nation" Program. Mr. Duke is originally from Gilmer, Texas.

EXHIBIT G

4. The hourly rates for the partners, attorneys and professional support staff included in Exhibit 1 are the usual and customary current hourly rates charged for their services in non-contingent matters, which have been accepted and approved in other complex class action litigations. The exhibit was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

5. Exhibit 2 attached hereto is a summary by category of the unreimbursed expenses incurred by my firm from inception through November 13, 2013, in connection with the prosecution of this litigation. The expenses incurred in this action are reflected on my firm's books and records, which are prepared from invoices, receipts, credit card bills, cancelled checks and wire transfer notices expense vouchers, check records, and other source materials and represent an accurate recordation of the expenses incurred. The total expenses incurred by my firm is \$67.08.

6. Exhibit 3 sets forth the biographies of the principal attorneys from my firm who were involved in this case.

RADICE LAW FIRM, P.C.



John D. Radice

Dated: March 5, 2014

EXHIBIT 2**DORYX ANTITRUST LITIGATION
EXPENSE REPORT****Firm Name: Radice Law Firm, P.C.****Reporting Period: Inception through November 13, 2013**

EXPENSE	AMOUNT
Litigation Fund	
Travel/Hotel/Meals	
Copying Services	
Research Services	
Telephone/Teleconference/Fax	
FedEx/Messengers/Postage	\$27.08
Court Fees	\$40.00
Other (describe)	
TOTAL	\$67.08

RADICE LAW FIRM, P.C.

34 Sunset Blvd
Long Beach, NJ 08008
Tel: (646) 245-8502
Fax: (609) 385-0745

Attorney Biography: John D. Radice

John Radice founded the Radice Law Firm, P.C. to prosecute False Claims Act, antitrust, and other complex civil litigation on behalf of relators and plaintiffs. Prior to founding the firm, Mr. Radice was associated with major plaintiffs' class action firms in New York City and Philadelphia, where he primarily represented clients pursuing antitrust, False Claims Act, and international human rights cases.

Mr. Radice has been a part of the litigation or trial teams in, *inter alia*, the following cases:

- *In re Flonase Direct Purchaser Antitrust Litigation*, No. 08-cv-3149 (E.D. Pa.) (\$150 million settlement reached on the eve of trial in case alleging delayed generic entry of Flonase caused by defendant's sham citizens' petitions)
- *Meijer v. Abbott Laboratories Antitrust Litigation*, No. C 07-5985 (N.D. Cal.) (\$52 million settlement following three days of trial in case alleging anticompetitive bundling of Norvir and Kaletra);
- *In re Puerto Rico Cabotage Antitrust Litigation*, No. 08-md-1960 (D.P.R.) (\$52.25 million cash settlement plus price freeze option following alleged price fixing and market allocation by Jones Act shippers);
- *In re Tricor Direct Purchaser Antitrust Litigation*, No. 05-340 (D. Del.) (\$250 million settlement after the start of trial in case alleging delayed entry of generic versions of Tricor);
- *In re Neurontin Marketing & Sales Litigation*, No. 04-10981 (D. Mass.) (resulting in a RICO jury verdict statutorily trebled to over \$142 million for the unlawful and fraudulent promotion of Neurontin);
- *United States ex rel. Piacentile v. Bristol-Myers Squibb Co.*, No. 05-10196 (D. Mass.) (\$515 million qui tam settlement related to unlawful promotion of Abilify); and

- *United States ex rel. Marchese v. Cell Therapeutics, Inc.*, No. 06-168 (W.D. Wash) (\$10.5 million qui tam settlement stemming from unlawful marketing of Trisonex).

Mr. Radice has been named by SuperLawyers as a “Rising Star” for the past 3 years, first in New York and now in New Jersey. According to SuperLawyers, “Lawyers are asked to nominate the best attorneys who are 40 or under, or who have been practicing for 10 years or less. . . . No more than 2.5 percent of the lawyers in the state are named to the [Rising Stars] list.” Mr. Radice is admitted to the bars of New Jersey and New York, as well as various federal courts, and is a member of Taxpayers Against Fraud.

Mr. Radice, either alone or with co-authors, frequently publishes articles on current topics in antitrust and False Claims Act law, including:

- *Where do we go now? The Hatch-Waxman Act 25 Years Later: Successes, Failures, and Prescriptions for the Future*, 41 RUTGERS L. J. 229 (Fall 2009 & Winter 2010);
- *The False Claims Act: A Public-Private Partnership* in Volume II, in AAJ 2009 ANNUAL CONVENTION: AAJ EDUCATION REFERENCE MATERIALS 1497 (Jennifer Adams ed., 2009); and
- *Daubert and Rule 702 in the Context of Antitrust Economic Experts: A Practitioner’s Guide*, DAUBERT 15 YEARS LATER: HOW HAVE ECONOMISTS FARED (ABA Spring Meeting 2009).

Mr. Radice clerked for Judge Edith Brown Clement in the United States Court of Appeals for the Fifth Circuit in New Orleans following his graduation from New York University School of Law. Through the Arthur Garfield Hays Civil Liberties Program at NYU Law, where he was a Palmer Weber Fellow, Mr. Radice pursued internships at the NAACP Legal Defense & Education Fund, the ACLU, and a prominent civil rights law firm. Prior to law school, Mr. Radice was a bond trader with JPMorgan in New York, where he traded US Government Agency bonds and related derivative instruments. At Princeton, where he graduated *magna cum laude*, Mr. Radice was a member of the lightweight crew team. Together with Dr. Lee Shearer, he founded and is president of Insicknessandinhealth.org, a non-profit dedicated to promoting health and well-being in underserved communities.

Education:

A.B., *magna cum laude*, Princeton University (1997)

J.D., New York University School of Law (2003)

Clerkship:

Judge Edith Brown Clement in the United States Court of Appeals for the Fifth Circuit in New Orleans (2003-2004)

Bar Affiliations and Court Admissions:

Bar of the State of New Jersey (2004)

Bar of the State of New York (2005)

U.S. District Courts for the Southern and Eastern Districts of New York and the District of New Jersey

Taxpayers Against Fraud, member

Mr. Radice can be reached at (646) 245-8502 and jradice@radicelawfirm.com

EXHIBIT H

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MYLAN PHARMACEUTICALS, INC., et al.

Plaintiff,

v.

WARNER CHILCOTT PUBLIC LIMITED
COMPANY, et al.,

Defendants.

Civ. No. 12-3824
CONSOLIDATED

**DECLARATION OF ATTORNEY FEES AND COSTS IN SUPPORT OF
DIRECT PURCHASER CLASS PLAINTIFFS' MOTION FOR AN AWARD OF
ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND PAYMENT OF
INCENTIVE AWARDS TO THE CLASS REPRESENTATIVES**

I, John A. Macoretta, declare as follows:

1. I am a partner at the law firm of Spector Roseman Kodroff & Willis, PC. I submit this declaration in support of Direct Purchaser Class Plaintiffs' ("Class Plaintiffs") motion for an award of attorneys' fees, reimbursement of expenses and payment of incentive awards to the class representatives in connection with services rendered in prosecuting this action.

2. My firm has acted as counsel to the Class Plaintiffs in this litigation. During the course of this litigation, my firm has been involved in the following activities:

- Searching the database for relevant documents, analyzing documents and drafting memos on specific subject, including the use and extent of couponing; Mylan's ability to bring its generic product to market; and other generic companies' status in the but-for world.
- Paralegal analysis and sorting of discovery documents.

- Collecting and organizing a compendium of the best documents in the case, for use in discovery and drafting pleadings.
- Monitoring and attending the depositions of twelve Mylan employees, and drafting memos on the Mylan testimony and its impact on our case.
- Monitoring and attending the depositions of other generic manufacturers.
- Participating in calls with Lead counsel to discuss discovery strategy, discovery results and developing our case, especially as to developing facts for our but-for-world.
- Conferring with FDA expert Martha Bennett to provide data for her report. Reviewing the defendants' Expert reports on FDA and generic launch issues.

3. Exhibit 1 attached hereto is a summary of the time spent by my firm's attorneys and professional support staff who were involved in this litigation, and the lodestar calculation based on my firm's usual and customary hourly billing rates. The total number of hours expended by my firm from inception through this date is 984.1 hours. The total lodestar for my firm is \$546,955.75.

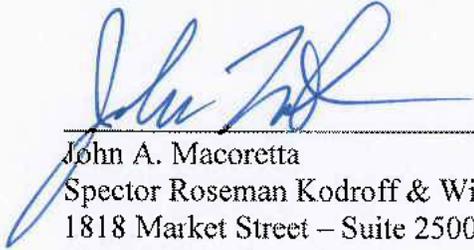
4. The hourly rates for the partners, attorneys and professional support staff included in Exhibit 1 are the usual and customary current hourly rates charged for their services in non-contingent matters, which have been accepted and approved in other complex class action litigations. The exhibit was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

5. Exhibit 2 attached hereto is a summary by category of the unreimbursed expenses incurred by my firm connection with the prosecution of this litigation. The expenses incurred in this action are reflected on my firm's books and records, which are prepared from invoices, receipts, credit card bills, cancelled checks and wire transfer notices expense vouchers, check

records, and other source materials and represent an accurate recordation of the expenses incurred. The total expenses incurred by my firm is \$52,745.86.

6. Exhibit 3 sets forth the biographies of the principal attorneys from my firm who were involved in this case.

Spector Roseman Kodroff & Willis, PC



John A. Macoretta
Spector Roseman Kodroff & Willis, P.C.
1818 Market Street – Suite 2500
Philadelphia, PA 19103
Telephone: (215) 496-0300
Facsimile: (215) 496-6611

Dated: February 26, 2014

EXHIBIT 1**DORYX ANTITRUST LITIGATION
TIME REPORT****Firm Name: Spector Roseman Kodroff & Willis, PC****Reporting Period: Inception through November 13, 2013**

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Jeffrey Kodroff	P	12.9	710.	9123.50
John Macoretta	P	827.0	625	516843.75
Gerri DeMarshall	PL	1.	210	210.00
Nicole Noronha	PL	42.8	145	6206.00
Van Strother	PL	100.5	145	14572.50
TOTALS		984.1		\$546,955.75

P = Partner

C = Counsel

A = Associate

PL = Paralegal

EXHIBIT 2**DORYX ANTITRUST LITIGATION
EXPENSE REPORT****Firm Name: Spector Roseman Kodroff & Willis, PC****Reporting Period: Inception through November 13, 2013**

EXPENSE	AMOUNT
Litigation Fund	45,000.00
Travel/Hotel/Meals	5,464.22
Copying Services	1,518.70
Research Services	33.60
Telephone/Teleconference/Fax	49.96
FedEx/Messengers/Postage	143.40
Court Fees	350.00
Other (describe) C D'S burned	185.98
TOTAL	\$52,745.86

EXHIBIT 3

SPECTOR ROSEMAN KODROFF & WILLIS

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
1818 MARKET STREET, SUITE 2500
PHILADELPHIA, PENNSYLVANIA 19103
(215) 496-0300
FAX (215) 496-6611
<http://www.srkw-law.com>
email: classaction@srkw-law.com

FIRM BIOGRAPHY

Spector Roseman Kodroff & Willis is a highly successful law firm with a nationwide practice that focuses on class actions and complex litigation, including securities, antitrust, consumer protection, and commercial claims. The firm is active in major litigation in state and federal courts throughout the country and internationally. The firm's reputation for excellence has been recognized by numerous courts which have appointed the firm as lead counsel in prominent class actions. As a result of the firm's efforts, defrauded consumers and shareholders have recovered billions of dollars in damages and implemented important corporate governance reforms. The firm is rated "AV" by Martindale-Hubbell, its highest rating for competence and integrity.

Judges throughout the country have recognized the Firm's contributions in class action cases:

- "Lead class counsel - Jeffrey Corrigan and the other lawyers from Spector Roseman Kodroff & Willis, P.C. - performed brilliantly in this exceptionally difficult case." *In re OSB Antitrust Litigation*, Master File No. 06-CV-00826 (PSD) (E.D. Pa. Dec. 9, 2008);
- "[Class counsel] did a wonderful job here for the class and were in all respects totally professional and totally prepared. I wish I had counsel this good in front of me in every case." *In re Parmalat Securities Litigation*, No. 04 Civ. 0030 (LAK) (S.D.N.Y.) (approval hearing March 2, 2009);
- "I think perhaps the most important for the class is the recovery, and I think the recovery has been significant and very favorable to the class given my understanding of the risks in the litigation. And so perhaps that's always the starting point for judging and assessing the quality of representation. The class I think was well represented, in that it got a very significant recovery in the circumstances." *In re SCOR Holding (Switzerland) AG Litigation*, No. 04 Civ. 07897 (MBM) (S.D.N.Y.) (formerly known as Converium Holdings);
- "[O]utstanding work [of counsel] ... was done under awful time constraints" and the "efforts here were exemplary...under lousy time constraints." *In re Atheros Communications, Inc. Shareholder Litigation*, C.A. No. 6124-VCN (Del. Ch.);

- “Plaintiffs’ counsel have been excellent in this complex, hard-fought litigation and innovative in its notice program and efforts to find class members.” *New England Carpenters Health Benefits Fund v. First Databank, Inc.*, C.A. 05-11148 (D. Mass. Aug. 3, 2009);
- “Here, Plaintiffs’ counsel are highly experienced in complex antitrust litigation, as evidenced by the attorney biographies filed with the Court. . . . They have obtained a significant settlement for the Class despite the complexity and difficulties of this case.” *Stop & Shop Supermarket Co. v. SmithKline Beecham Corp.*, C.A. No. 03-4578 (E.D. Pa. May 19, 2005);
- “Counsel are among the most experienced lawyers the national bar has to offer in the prosecution and defense of significant class actions.” *In re Lupron Marketing and Sales Practices Litigation*, 345 F. Supp. 2d 135, 137-38 (D. Mass. 2004);
- “[T]he class attorneys in this case have worked with enthusiasm and have been creative in their attempt to compensate as many members of the consumer class as possible. . . . This Court has consistently noted the exceptional efforts of class counsel.” *In re Relafen Antitrust Litigation*, 231 F.R.D. 52, 80 (D. Mass. 2005);

Securities/Corporate Governance Litigation

SRKW’s securities practice group has actively managed important class actions involving securities fraud, winning not only significant damages but also important corporate governance reforms. Some of the Firm’s most notable cases include:

- *In re Parmalat Securities Litigation*, No. 04 Civ. 0030 (LAK) (S.D.N.Y.). SRKW was one of the co-lead counsel for the lead plaintiffs, who are European institutional bond holders, in this widely-known case, often called the “Enron of Europe.” This is a massive worldwide securities fraud action involving the collapse of an international dairy conglomerate, in which major financial institutions and accounting firms created schemes to materially overstate Parmalat’s revenue, income, and assets, and understate its considerable and expanding debt. The case has been heavily litigated for five years, resulting in settlements of \$98 million.

In addition, settlements with certain accounting firms provided that these defendants confirm their endorsement of specific corporate governance principles of behavior designed to advance investor protection and to minimize the likelihood of future deceptive transactions. This is the first time in a Section 10(b) case that shareholders were able to negotiate corporate governance measures from a defendant other than the issuer.

- *In re SCOR Holding (Switzerland) AG Litigation*, No. 04 Civ. 07897 (MBM) (S.D.N.Y.). SRKW is co-lead counsel for a class of investors, having achieved settlements on two continents of \$145 million.

- *In re Laidlaw, Inc. Bondholders Securities Litigation*, No. 3-00-2518-17 (D.S.C.). SRKW was a member of the Executive Committee in this complex accounting case which resulted in a settlement of \$42,875,000.
- *In re Abbott Laboratories, Inc. Derivative Shareholder Litigation*, C.A. No. 99-C 07246 (N.D. Ill.). SRKW was co-lead counsel for plaintiffs. The case was dismissed twice but reversed on appeal, and settled in 2004 for substantial corporate governance reforms funded by \$27 million from directors. The ABA's *Securities Litigation Journal* called the Seventh Circuit's opinion the second most important decision in 2003.
- *Felzen v. Andreas (Archer Daniels Midland Co. Derivative Litigation)*, C.A. No. 95-2279 (C.D. Ill.). As co-lead counsel, SRKW negotiated broad corporate governance changes in the company's board structure including strengthening the independence of the board of directors, creating corporate governance and regulatory oversight committees, requiring that the audit committee be composed of a majority of outside directors, and establishing an \$8 million fund for educational seminars for directors and the retention of independent outside counsel for the oversight committees.

The Firm is in the forefront of advising and representing foreign institutional investors in U.S. class actions and in group actions in Europe, Australia and Japan. During the past 12 years, SRKW has been working with and representing various European investors and conducting educational seminars on securities class actions, as well as speaking at international shareholder and corporate governance conferences. The Firm is currently counsel to numerous large European entities.

Pharmaceutical Marketing Litigation

Since 2001, the Firm has been at the vanguard of identifying and pursuing healthcare reforms. It has developed an extensive practice in representing consumers and third-party payors in class actions against pharmaceutical companies over the unlawfully high pricing of prescription drugs. These cases have proceeded in state and federal courts on a variety of legal theories, including state and federal antitrust law, state consumer protection statutes, common law claims of unjust enrichment, and the federal RICO statute.

As part of their work in this area, the Firm's attorneys have formally and informally consulted with the Attorneys General of a number of states, who have been actively involved in drug and health care litigation. The Attorney General of Connecticut chose SRKW in a competitive bidding process to help lead the state's pharmaceutical litigation involving use of the Average Wholesale Price. The Firm's clients also include large employee benefit plans as well as individual consumers.

Some of the Firm's important pharmaceutical cases include the following:

- SRKW devised the legal theory for claims against most major pharmaceutical companies for using the Average Wholesale Price to inflate the price paid by consumers and third-party payors for prescription and doctor-administered drugs. The larger AWP case, *In re Pharmaceutical Industry Average Wholesale Price Litigation*, MDL No. 1456 (D. Mass.), was tried in part to the court in November-December 2006. On June 21, 2007, the judge issued a 183-page opinion largely finding for plaintiffs, and requesting additional evidence on damages. Moreover, plaintiffs have reached settlements in amounts exceeding \$230 million. SRKW was co-lead counsel for the class.
- SRKW was co-lead counsel in *In re Lupron Marketing and Sales Practices Litigation*, MDL No. 1430 (D. Mass.), which resulted in a settlement of \$150 million for purchasers of the cancer drug Lupron.
- In *New England Carpenters Health Benefits Fund v. First Databank, Inc.*, C.A. 05-11148 (D. Mass.) and *District 37 Health and Securities Fund v. Medi-Span*, C.A. No. 07-10988 (D. Mass.), SRKW was co-lead counsel for a group of third-party payors who pay for prescription drugs at prices based on the AWP. The complaints allege that First DataBank and Medispan, two of the largest publishers of AWP, fraudulently published inflated AWP prices for thousands of drugs. The claims against McKesson settled for \$350 million. In addition, the settlement requires First DataBank and Medispan to lower the AWP price they publish for hundreds of drugs (by reducing the formulaic ratio they use to calculate AWP); and to eventually cease publishing AWP prices. Plaintiffs' experts conservatively estimate that the savings from this settlement will be in the hundreds of millions of dollars.
- SRKW was co-lead counsel on behalf of direct purchasers of the drug Paxil in *Stop & Shop Supermarket Co. v. Smithkline Beecham Corp.* C.A. 03-4578 (E.D. Pa.). The complaint alleged that the drug company misled the U.S. Patent and Trademark Office in obtaining the patents protecting Paxil and then used the patents to prevent lower-cost, generic versions of the drug from coming to market. A settlement of \$100 million was approved by the court.
- SRKW was co-lead counsel for indirect purchasers in prosecuting state antitrust and consumer protection claims against Abbott Laboratories and Labatoires Fournier for suppressing competition from generic versions of TriCor in *In re TriCor Indirect Purchaser Antitrust Litigation*, C.A. No. 05-360 (D. Del.). The indirect purchaser case settled for \$65.7 million to the class plus a substantial settlement for opt-out insurers.
- SRKW was co-lead counsel for indirect purchasers in prosecuting state antitrust and consumer protection claims against GlaxoSmithKline for suppressing competition from generic versions of its drug Relafen by fraudulently obtaining a patent on the compound in *In re Relafen Antitrust Litigation*, C.A. No. 01-12239 (D. Mass.). The indirect purchaser settlement for \$75 million was approved by the court (the overall settlement for all plaintiffs exceeded \$400 million).

- SRKW is serving as co-lead counsel in on-going litigation over pay-for-delay settlements involving the drugs Provigil and Effexor XR. The firm represents end -payors (consumers and healthplans) who were denied the chance to buy cheaper generic alternatives because of manipulation of the patent challenge and generic drug approval system by the brand name companies and some generic manufacturers. *Vista HeathPlan v. Cephalon et al*, No. 06-cv-1833, (E.D. Pa.) (Provigil), and *In re Effexor XR Antitrust Litigation* (No. 3:11-cv-05479 (D.N.J.)).

Antitrust Litigation

SRKW's antitrust practice group regularly oversees important antitrust cases. Among the Firm's most significant cases are:

- *In re Blood Reagents Antitrust Litigation*, MDL 09-2081 (E.D. Pa.). SRKW was appointed sole Lead Counsel in this nation-wide, price-fixing class action. In January 2012, Spector Roseman negotiated a \$22 million settlement with one defendant, and Judge DuBois certified plaintiffs' class in August 2012 (currently pending appeal).
- *McDonough, et al, v. Toys R Us, et al.* (E.D.Pa.). SRKW was appointed co-lead counsel on behalf of six sub-classes of purchasers of baby products from Babies "R" Us, one of the rare cases in which a class of purchasers damaged as a result of resale price maintenance has been certified.
- *In re Linerboard Antitrust Litigation*, MDL No. 1261 (E.D. Pa.). SRKW was appointed co-lead counsel for plaintiffs in this price-fixing antitrust action, which settled for a total of \$202 million, the largest antitrust settlement ever in the Third Circuit.
- *In re OSB Antitrust Litigation*, Master File No. 06-CV-00826 (PSD) (E.D. Pa.). SRKW was lead counsel for a nationwide class of direct purchasers, which settled for \$120 million.
- *In re Flat Glass Antitrust Litigation*, MDL No. 1200 (W.D. Pa.). SRKW was co-lead counsel for plaintiffs in this price fixing/market allocation antitrust action, which settled for \$120 million.
- *In re DRAM Antitrust Litigation*, MDL No. 1486 (N.D. Cal.). SRKW was a member of the executive committee in this action against all major manufacturers of "dynamic random access memory" ("DRAM"), alleging that defendants conspired to fix the prices they charged for DRAM in the United States and throughout the world. The case settled with all defendants for more than \$300 million.

- *In re Vitamins Antitrust Litigation*, Misc. No. 99-0197 (D.D.C.). SRKW was a member of the executive committee and co-chair of the discovery committee for plaintiffs in this price-fixing antitrust action, which settled for \$300 million.

PARTNERS

JEFFREY L. KODROFF concentrates his practice in healthcare antitrust, securities and consumer litigation. He was among the first attorneys to represent clients in class action litigation against national health maintenance organizations. (*Tulino v. U.S. Healthcare, Inc.*, No. 95-CV-4176 (E.D. Pa.)). He also filed the first class action complaint against the manufacturers of the cancer drug Lupron relating to the illegal marketing practices and use of the published Average Wholesale Price. Mr. Kodroff was co-lead counsel in *In re Lupron Marketing and Sales Practices Litigation*, MDL No. 1430 (D. Mass.), which settled for \$150 million. Mr. Kodroff was also co-lead counsel in a consolidated national class action against many of the largest pharmaceutical companies in the world, including GlaxoSmithKline, BMS, J&J, Schering-Plough, and AstraZeneca, for their illegal marketing and use of a false Average Wholesale Price. See *In re Pharmaceutical Industry Average Wholesale Price Litigation*, MDL No. 1456 (D. Mass.)(settlement over \$300 million.)

He has also served as lead or co-lead counsel in other substantial pharmaceutical marketing cases, including *New England Carpenters Health Benefits Fund v. First Databank, Inc. and McKesson Corp.*, C.A. 05-11148 (D. Mass.); and *District 37 Health and Securities Fund v. Medi-Span*, C.A. No. 07-10988 (D. Mass. 2007). This massive class action litigation was against pharmaceutical wholesaling giant McKesson Corporation (“McKesson”) and pharmaceutical pricing publishers First DataBank, Inc. (“FDB”) and Medi-Span. The case addressed an unlawful 5% mark-up in the Average Wholesale Prices (“AWPs”) of various drugs, causing consumers and third party payors to overpay for pharmaceuticals. The case settled for \$350 million plus an agreement to roll back AWP’s by 5%, thereby saving the Class and others hundreds of millions of dollars.

Mr. Kodroff has also been very active in litigation against brand named pharmaceutical companies in their attempts to keep generic drugs from entering the market.

Mr. Kodroff has served or is serving as co-lead counsel in numerous major cases, including:

- *In re OSB Antitrust Litigation*, Master File No. 06-CV-00826 (E.D. Pa., Judge Paul S. Diamond)(settled for \$120 million);
- *Stop & Shop Supermarket Co. v. Smithkline Beecham Corp.* C.A. 03-4578 (E.D. Pa., Judge Padova) (settled for \$150 million);

- *In re Express Scripts, Inc., PBM Litigation*, Master Case No. 05-md-01672-SNL (E.D. Mo.);
- *In re Lovenox Antitrust Litigation*, Case No. CV05-5598 (C.D. Cal.);
- *In re DDAVP Indirect Purchaser Antitrust Litigation*, Case No. 05 Civ 2237 (S.D.N.Y.);
- *Man-U Service Contract Trust, et al. v. Wyeth, Inc. (Effexor Antitrust Litigation)* Civil Action No. 3:11-cv-05661 (D.N.J.);
- *In re: Merck Mumps Vaccine Antitrust Litigation*, Master File No. 2:12-cv-03555 (E.D. Pa., Judge C. Darnell Jones, II); and
- *Vista Healthplan Inc. v. Cephalon, Inc., et al.*, Case No. 2:06-cv-1833 (E.D. Pa., Judge Mitchell S. Goldberg).

Mr. Kodroff has served as lead or co-lead counsel in many class action securities fraud cases, including *In re Unisys Corporation Securities Litigation*, No. 99-CV-5333 (E.D. Pa.); *In re Dreyfus Aggressive Growth Mutual Fund Litigation*, No. 98 Civ. 4318 (HB) (S.D.N.Y.); *Kalodner v. Michaels Stores, Inc.*, No. 3:95-CV-1903-R (N.D. Tex.); *In re Valuevision International, Inc. Securities Litigation*, Master File No. 94-CV-2838 (E.D. Pa.); *In re GTECH Holdings Corp. Securities Litigation*, Master File No. 94-0294 (D.R.I.); *In re Surgical Laser Technologies, Inc. Securities Litigation*, No. 91-CV-2478 (E.D. Pa.); and *The Berwyn Fund v. Kline*, No. 4671-S-1991 (Dauphin Cty. C.C.P.).

He has also served as lead or co-lead counsel in many consumer class actions including the current case *In re Google Inc. Street View Electronic Communications Litigation*, Case No. C 10-md-02184 JW (N.D. Cal.), which arose out of Google's interception of electronic communications by its Street View vehicles. Other consumer class actions in which Mr. Kodroff has served as lead or co-lead counsel include: *Kaufman v. Comcast Cablevision of Phila., Inc.*, No. 9712-3756 (Phila. C.C.P.); *LaChance v. Harrington*, No. 94-CV-4383 (E.D. Pa.); *Smith v. Recordex*, No. 5152, June Term 1991 (Phila. Cty. C.C.P.); *Guerrier v. Advest Inc.*, C.A. No. 90-709 (D.N.J.); and *Pache v. Wallace*, C.A. No. 93-5164 (E.D. Pa.).

Mr. Kodroff has served as a Continuing Legal Education presenter on class actions and health care issues as well as making presentations at conferences including the NCPERS Health Care Symposium and the Pennsylvania Public Employees Retirement System Conference.

He also serves on the advisory board for the Bureau of National Affairs Class Action Litigation Report. Mr. Kodroff also appeared with one of his clients before the U.S. House of Representatives, Subcommittee on Housing and Community Opportunity, Committee on Banking and Financial Services on the issue of predatory lending.

Mr. Kodroff is admitted to practice in the Commonwealth of Pennsylvania and the United States District Courts for the Middle and Eastern Districts of Pennsylvania. He is a member of the Pennsylvania, Philadelphia, and American Bar Associations. A graduate of LaSalle University, where he earned his undergraduate degree in finance (*magna cum laude*, 1986), Mr. Kodroff received his law degree from Temple University School of Law (1989). He is a resident of Dresher, Pennsylvania. Mr. Kodroff is AV-rated by Martindale-Hubbell.

JOHN MACORETTA represents both individuals and businesses in a wide variety of litigation and, occasionally, transactional matters. He currently represents consumers and healthcare payors in several cases alleging that brand name pharmaceutical companies illegally kept generic drug competitors off the market, including cases involving the drugs Provigil, Effexor and Suboxone. Mr. Macoretta is also involved in electronic privacy litigation, including the *In re Google Streetview Electronic Communications Litigation*, No. 10-md-02184 (N.D. Cal.), where he is a co-lead counsel representing consumers whose private wi-fi communications were intercepted. Mr. Macoretta also represents investors in stock-broker arbitration and class-action securities fraud litigation.

He has been involved in a number of significant cases, including *In re Pharmaceutical Industry Average Wholesale Price Litigation*, MDL No. 1456 (D. Mass.) (where he acted as one of the trial counsel); *In re Lupron Marketing and Sales Practices Litigation*, MDL No. 1430 (D. Mass.); *In re Unisys Corporation Securities Litigation*, No. 99-CV-5333 (E.D. Pa.); *Masters v. Wilhelmina Model Agency, Inc.*, No. 02 Civ. 4911 (S.D.N.Y.); *In re Dynamic Random Access Memory (DRAM) Antitrust Litigation*, C.A. No. M-02-1486 PJH (N.D. Cal.).

Mr. Macoretta graduated with honors from the University Of Texas Law School in 1990 and received his undergraduate degree *cum laude* from LaSalle University in 1986. He is admitted to practice in the Commonwealth of Pennsylvania and the State of New Jersey; the United States Courts of Appeals for the First, Third and Ninth Circuits; and the United States District Courts in the District of New Jersey, the Eastern District of Michigan, and the Middle and Eastern Districts of Pennsylvania. In addition to being a member of the Philadelphia Bar Association, Mr. Macoretta also serves as an arbitrator in the Philadelphia Court of Common Pleas and the U.S. District Court. Mr. Macoretta also serves as a *pro bono* attorney representing Philadelphia residents whose homes are facing foreclosure.

EXHIBIT I

- Worked with regulatory expert on preparation of his report and preparing him for deposition.

3. Exhibit 1 attached hereto is a summary of the time spent by my firm's attorneys and professional support staff who were involved in this litigation, and the lodestar calculation based on my firm's usual and customary hourly billing rates. The total number of hours expended by my firm from inception through this date is 1,848.1 hours. The total lodestar for my firm is \$1,016,995.

4. The hourly rates for the partners, attorneys and professional support staff included in Exhibit 1 are the usual and customary current hourly rates charged for their services in non-contingent matters, which have been accepted and approved in other complex class action litigations. The exhibit was prepared by me from contemporaneous, daily time records regularly prepared and maintained by my firm.

5. Exhibit 3 attached hereto is a summary by category of the unreimbursed expenses incurred by my firm connection with the prosecution of this litigation. The expenses incurred in this action are reflected on my firm's books and records, which are prepared from invoices, receipts, credit card bills, cancelled checks and wire transfer notices expense vouchers, check records, and other source materials and represent an accurate recordation of the expenses incurred. The total expenses incurred by my firm is \$74,049.23.

6. Exhibit 3 sets forth the biographies of the principal attorneys from my firm who were involved in this case.

TAUS, CEBULASH & LANDAU, LLP



Archana Tamoshunas

Dated: January 28, 2014

EXHIBIT 1**DORYX ANTITRUST LITIGATION
TIME REPORT****Firm Name: Taus, Cebulash & Landau, LLP****Reporting Period: Inception through November 13, 2013**

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Barry Taus	P	430.1	\$700.00	\$301,070.00
Brett Cebulash	P	0.5	\$650.00	\$325.00
Archana Tamoshunas	P	1,200.8	\$550.00	\$660,440.00
Miles Greaves	A	98.5	\$290.00	\$28,565.00
Nathan Hennigan	LC	118.2	\$225.00	\$26,595.00
TOTALS		1848.1		\$1,016,995

P = Partner

C = Counsel

A = Associate

PL = Paralegal

LC = Law Clerk

EXHIBIT 2**DORYX ANTITRUST LITIGATION
EXPENSE REPORT****Firm Name: Taus, Cebulash & Landau, LLP****Reporting Period: Inception through November 13, 2013**

EXPENSE	AMOUNT
Litigation Fund	\$65,000
Travel/Hotel/Meals	\$6,459.01
Copying Services	\$1,865.25
Research Services	\$531.00
Telephone/Teleconference/Fax	\$150.00
FedEx/Messengers/Postage	\$43.97
Court Fees	
Other (describe)	
TOTAL	\$74,049.23

Exhibit 3



TAUS, CEBULASH & LANDAU, LLP

80 MAIDEN LANE, SUITE 1204
NEW YORK, NEW YORK 10038
212-931-0704
WWW.TCLLAW.COM

FIRM RESUME

TAUS, CEBULASH & LANDAU, LLP is a litigation firm with a focus in complex antitrust and consumer protection class actions. The firm was founded in July 2009 with a few basic guiding principles: we are dedicated to providing the highest quality legal representation to our clients and class members, while working in an environment that inspires collaboration, inventiveness and productivity. Our founding partners have worked together for many years before starting the firm, and we have over 50 years combined experience in our practice areas.

We have extensive knowledge and experience in pharmaceutical and medical device antitrust actions. Prior to the founding of Taus, Cebulash & Landau, LLP, our attorneys played a leadership role in cases where hundreds of millions of dollars were recovered for class members, including the largest settlement of any direct purchaser class action alleging impeded generic pharmaceutical competition in the Hatch-Waxman antitrust context (the \$250 million *Tricor* settlement). We currently represent plaintiffs and class members in pharmaceutical antitrust actions including *In re Effexor XR Direct Purchaser Antitrust Litigation*, 11-cv-05479 (D.N.J.) (Executive Committee); *In re Prandin Direct Purchaser Antitrust Litigation*, 10-cv-12141 (E.D. Mich.) (Executive Committee); *In re Nexium (Esomeprazole) Antitrust Litigation*, 12-md-2409 (D. Mass.), *Giant Eagle, Inc. v. Cephalon, Inc. et al.*, 10-cv-5164 (E.D. Pa.), *In Re Wellbutrin XL Antitrust Litigation*, 08-cv-2431 (E.D. Pa.), *In re Niaspan Antitrust Litigation*, 13-md-2460 (E.D. Pa.), *In re Skelaxin (Metaxalone) Antitrust Litigation MDL 2343* (E.D. Tenn.), and *In re Lipitor Antitrust Litigation*, 12-cv-2389 (D.N.J.). Additionally, Taus, Cebulash & Landau, LLP and our co-counsel represent class members in various other complex antitrust actions in a variety of industries including *In Re Mushrooms Direct Purchaser Antitrust Litigation*, 06-cv-620 (E.D. Pa.), *Marchese v. Cablevision Systems Corp., and CSC Holdings, Inc.*, 10-cv-02190 (D.N.J.), *Universal Delaware Inc. v. Ceridian Corp., et al.*, 09-cv-2327 (E.D. Pa.), *In re Florida Cement and Concrete Antitrust Litigation*, 09-cv-23187 (S.D. Fl.), *In re Photochromic Lens Antitrust Litigation*, 10-md-2173 (M.D. Fl.); and *Wallach, et al. v. Eaton, et al.*, 10-cv-260 (D. Del.) (Executive Committee).

Our attorneys also have significant experience in consumer protection class actions, representing class members in *Esslinger, et al. v. HSBC*, 10-cv-3213 (E.D. Pa.) (Co-Lead Counsel); *In re Discover Payment Protection Plan Marketing and Sales Practices Litigation*, 10-cv-6994 (N.D. Ill.); *In re Bank of America Credit Protection Marketing and Sales Practices Litigation*, 11-md-02269 (N.D. Cal.) (Executive Committee); *Arnett v. Bank of America*, 11-cv-1372 (D.Or.); and *Scheetz v. JP Morgan Chase*, 12-cv-4113 (S.D.N.Y.). Our attorneys have also previously taken active roles in such cases as *McCoy v. Capital One Bank (USA), N.A. and Capital One Services, L.L.C.*, 10-cv-0185 (S.D. Cal.), and *In Re National Arbitration Forum Trade Practices Litigation*, 09-cv-01939 (D. Minn.).

ATTORNEYS

BARRY S. TAUS, PARTNER

Barry S. Taus currently represents plaintiffs and class members in various antitrust class actions including *Universal Delaware Inc. v. Ceridian Corp., et al.*, *In re Wellbutrin XL Antitrust Litigation*, *In re Prandin Direct Purchaser Antitrust Litigation*, *Wallach, et al. v. Eaton, et al.*, *Marchese v. Cablevision Systems Corp., et al.*, *In re Metoprolol Succinate Antitrust Litigation*, *In re Effexor XR Direct Purchaser Antitrust Litigation* and *In re Skelaxin (Metaxalone) Antitrust Litigation*; and *In re Lipitor Antitrust Litigation*.

Prior to founding Taus, Cebulash & Landau, LLP, Mr. Taus was a partner for 13 years at a New York law firm that specialized in class action litigation. At his prior firm, he acted as Lead Counsel or Co-Lead Counsel for classes of direct purchasers in a number of major, complex antitrust litigations, including *In re Cardizem CD Antitrust Litigation* (E.D. Mich.) (settled for \$110 million); *In re Terazosin Hydrochloride Antitrust Litigation* (S.D. Fla.) (settled for \$75 million); and *In re Tricor Antitrust Litigation* (D. Del.) (settled for \$250 million). He also actively participated in a number of successfully resolved antitrust actions, including *In re Buspirone Antitrust Litigation* (S.D.N.Y.) (settled for \$220 million); *In re Relafen Antitrust Litigation* (D. Mass.) (settled for \$175 million); and *In re Remeron Antitrust Litigation* (D. N.J.) (settled for \$75 million), and led a number of major antitrust actions that are still pending, including *In re Ciprofloxacin Hydrochloride Antitrust Litigation* (E.D. N.Y.); *In re K-Dur Antitrust Litigation* (D.N.J.); and *In re Modafinil Antitrust Litigation* (E.D. Pa.).

As Lead Counsel for the direct purchaser class in the *Tricor* case, Mr. Taus successfully negotiated the largest settlement of any direct purchaser class action alleging impeded generic pharmaceutical competition in the Hatch-Waxman antitrust context (\$250 million). Prior to settlement, Mr. Taus was responsible for overseeing all material aspects of the litigation on behalf of the direct purchases class, including the extensive research leading to the initial complaint, analyzing thousands of pages of discovery documents and taking numerous depositions to marshal evidence to support plaintiffs' theories relating to liability, antitrust impact, causation, monopoly power and class certification, retaining and working closely with numerous experts, and ultimately preparing for and proceeding to trial.

In addition to his antitrust experience, Mr. Taus took a central, active role in numerous stockholder class action and derivative actions in which his prior firm was Lead Counsel or an Executive Committee member. These actions included *Rebenstock v Fruehauf Trailer Corp.*; *In re Par Pharmaceutical Securities Litigation*; *In re F&M Distributors, Inc. Securities Litigation*; *In re Taxable Municipal Bond Litigation*; *In re Bay Financial Securities Litigation*; and *Sanders v. Wang, et. al* (resulting in recovery from certain senior executives of stock valued in excess of \$225 million for the benefit of Computer Associates).

Furthermore, Mr. Taus has successfully played a leading role in various complex consumer class actions, including *Cicarell v. Provident Mutual Life Ins. Co.* (sales practice litigation settled for \$45 million) and *Provident Demutualization Litigation* (enjoined demutualization that would have harmed policyholders).

Mr. Taus graduated *cum laude* from the State University of New York at Albany in 1986 with a Bachelor of Science degree in Accounting. Mr. Taus graduated from Brooklyn Law

School in 1989, and is admitted to the Bar of the State of New York, as well as the United States District Court for the Southern District of New York and the United States Courts of Appeals for the Second and Eleventh Circuits. He is also a member of the New York State Bar Association and the American Bar Association.

BRETT CEBULASH, PARTNER

Brett Cebulash currently represents plaintiffs and class members in various antitrust and consumer class actions including *Marchese v. Cablevision Systems Corp., and CSC Holdings, Inc.; Wallach, et al. v. Eaton, et al.; In re Bank of America Credit Protection Marketing and Sales Practices Litigation; In re Effexor XR Direct Purchaser Antitrust Litigation; In re Lipitor Antitrust Litigation; Marchbanks Truck Service, et al. v. Comdata Network, Inc., et al; In re Discover Payment Protection Plan Marketing and Sales Practices Litigation; Esslinger, et. al. v. HSBC, Arnett v. Bank of America; Wallace v. Bank of America; Skansgaard v. Bank of America, Richards v. Citizens Bank; Casey and Skinner v. Citibank; and Scheetz v. JP Morgan Chase.*

Prior to founding Taus, Cebulash & Landau, LLP in July 2009, Mr. Cebulash was a partner for a decade at a New York law firm that specialized in class action litigation. At his prior firm, he litigated complex class actions in the fields of antitrust, securities, consumer fraud, insurance and employment law as well as stockholder derivative actions. Representative cases in these areas include *In re Neurontin Antitrust Litigation* (D.N.J); *Natchitoches Parish Hosp. v. Tyco* (D. Mass.); *In re Nifedipine Antitrust Litigation* (D.D.C.); *In re Terazosin Hydrochloride Antitrust Litigation* (S.D. Fla.); *In re Nasdaq Antitrust Litigation* (S.D.N.Y.); *Rebenstock v. Fruehauf Trailer Corp.* (E.D.Mich.); *In re F&M Distributors, Inc. Securities Litigation* (E.D.Mich.); *Gutter v. Dupont* (S.D.Fla.); *In re Cendant Derivative Litigation* (D.N.J.); *In re Bay Financial Securities Litigation* (D.Mass.); *In re Nuveen Funds Litigation* (N.D.Ill.); *In re Kemper Funds Litigation* (N.D.Ill); *In re Bank One Securities Litigation* (N.D.Ill); *Provident Demutualization Litigation* (Pa. Ct. Common Pleas); *In re Diet Drug Litigation* (N.J.Civ.); *Davis v. Kodak* (W.D.N.Y.) and *Diaz v. Electronics Boutique* (W.D.N.Y.).

Mr. Cebulash graduated from the University of Virginia with a Bachelor of Arts degree and from Brooklyn Law School, *cum laude*. Mr. Cebulash is admitted to practice by the State Bars of New York and New Jersey, as well as the United States District Courts for the Southern, Eastern and Western and Northern Districts of New York and the United States Courts of Appeals for the First, Third and Ninth Circuits. He is also a member of the New York State Bar Association.

KEVIN LANDAU, PARTNER

Kevin Landau currently represents plaintiffs and class members in various antitrust and consumer class actions, including *In Re Mushrooms Direct Purchaser Antitrust Litigation, In re Metoprolol Succinate Antitrust Litigation, In re Skelaxin (Metaxalone) Antitrust Litigation, Esslinger, et. al. v. HSBC; Arnett v. Bank of America, In re Bank of America Credit Protection Marketing and Sales Practices Litigation and In re Discover Payment Protection Plan Marketing and Sales Practices Litigation.* Mr. Landau also represents Giant Eagle, Inc. in *Giant Eagle, Inc. v. Cephalon, Inc. et al.*, an antitrust action alleging that Cephalon paid its generic competitors to stay off the market with their competing generic versions of Provigil.

Prior to founding Taus, Cebulash & Landau, LLP., Mr. Landau was a partner at a New York law firm that specialized in class action litigation. Mr. Landau has taken a central role in a number of successful antitrust, shareholder class and derivative actions class action litigations including, *Gutter v. Dupont* (S.D. Fl.) (recovery of \$77.5 million for shareholder class); *In re Cendant Corporation Derivative Litigation* (D.N.J.) (\$54 million recovery for the corporation in derivative action); *LiPuma v. American Express* (S.D. Fl.) (\$75 million recovery for cardholders in consumer class action); *McCoy v. Capital One Bank (USA), N.A. and Capital One Services, LLC*. He also led major antitrust litigations that are still pending, including *In re Mushrooms Antitrust Litig.* (E.D. Pa.).

Mr. Landau graduated with high honors from Lehigh University in 1993 with a Bachelor of Arts in Government. Mr. Landau graduated from Brooklyn Law School in 1996, where he was a member of the *Brooklyn Law Review*. Mr. Landau is admitted to the Bar of the State of New York, as well as the United States District Courts for the Southern and Eastern Districts of New York, and the United States Court of Appeals for the Second Circuit, Third Circuit, Eleventh Circuit and D.C. Circuit. He is also a member of the New York State Bar Association and the American Bar Association.

ARCHANA TAMOSHUNAS, PARTNER

Archana Tamoshunas currently represents classes of drug wholesalers in antitrust class actions including *In re Wellbutrin XL Antitrust Litigation*, *In re Nexium (Esomeprazole) Antitrust Litigation*, *In re Niaspan Antitrust Litigation*, *Rochester Drug Co-Operative, Inc. v. Endo Pharmaceuticals Inc., et al.* and *In re Prandin Direct Purchaser Antitrust Litigation*, and represents Giant Eagle, Inc. in *Giant Eagle, Inc. v. Cephalon, Inc. et al.*

Prior to joining Taus, Cebulash & Landau, LLP in July 2009, Ms. Tamoshunas was an associate at a New York law firm that specialized in class action litigation. At her prior firm, Ms. Tamoshunas was counsel in several complex federal antitrust class actions including those involving the pharmaceutical and medical device industries, as well as employment class actions. She has been heavily involved in all aspects of the litigation process in cases in which her firm was lead or co-lead counsel. She has been active in the day to day management of discovery, briefing, class certification and trial preparation in a number of cases including *In re Relafen Antitrust Litigation* (D. Mass.); *In re Terazosin Hydrochloride Antitrust Litigation* (S.D. Fla.) and *Natchitoches Parish Hospital District et al. v. Tyco International, et al.* (D. Mass.).

Ms. Tamoshunas graduated from Williams College, *cum laude*, in 1995 (B.A. Political Science and Studio Art) and New York University School of Law in 1999, where she was a member of the Moot Court Board. Ms. Tamoshunas is admitted to the Bar of the State of New York as well as the Southern and Eastern Districts of New York and the First Circuit Court of Appeals. After graduating from law school, Ms. Tamoshunas represented the City of New York in Family Court for three years.

MILES GREAVES, ASSOCIATE

Mr. Greaves graduated *summa cum laude*, with honors, from the State University of New York at Albany, in 2004, with a Bachelor of Arts in English; and *cum laude* from Brooklyn Law School in 2012. Mr. Greaves was admitted to the Bar of the State of New York in 2013. Mr.

Greaves began working part time for Taus, Cebulash & Landau in the fall of 2011, while attending law school, and has been with the firm ever since.

Mr. Greaves has assisted in a variety of complex class actions, including those brought against several major banks over the alleged abuse of force-placed insurance policies (such as *Arnett v. Bank of America, N.A.* (D. Or.) and *Scheetz v. JPMorgan Chase Bank, N.A.* (S.D.N.Y.)), as well as several antitrust claims, such as *Marchese v. Cablevision* (D.N.J.) and *In re: Wellbutrin XL Antitrust Litigation* (E.D. Penn.).

EXHIBIT J

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MYLAN PHARMACEUTICALS, INC., et al.

Plaintiff,

v.

WARNER CHILCOTT PUBLIC LIMITED
COMPANY, et al.,

Defendants.

Civ. No. 12-3824
CONSOLIDATED

**DECLARATION OF DAVID P. GERMAINE IN SUPPORT OF
DIRECT PURCHASER CLASS PLAINTIFFS' MOTION FOR AN AWARD OF
ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND PAYMENT OF
INCENTIVE AWARDS TO THE CLASS REPRESENTATIVES**

I, David P. Germaine, declare as follows:

1. I am a partner at the law firm of Vanek, Vickers & Masini PC. I submit this declaration in support of Direct Purchaser Class Plaintiffs' ("Class Plaintiffs") motion for an award of attorneys' fees, reimbursement of expenses and payment of incentive awards to the class representatives in connection with services rendered in prosecuting this action.

2. My firm has acted as counsel to Plaintiff Meijer, Inc. as well as to the Class Plaintiffs in this litigation. During the course of this litigation, my firm has been involved in the following activities:

- Pre-filing investigation
- Drafting of the Complaint and other pleadings
- Drafting and responding to discovery requests
- Collecting, review and preparation of document productions
- Deposition preparation and defense, including the preparation and presentation of a witness for Meijer

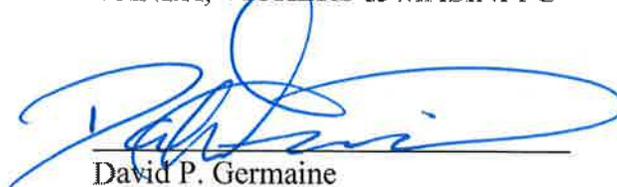
3. Exhibit 1 attached hereto is a summary of the time spent by my firm's attorneys and professional support staff who were involved in this litigation, and the lodestar calculation based on my firm's usual and customary hourly billing rates. The total number of hours expended by my firm from inception through this date is **640.5** hours. The total lodestar for my firm is **\$332,747.50**.

4. The hourly rates for the partners, attorneys and professional support staff included in Exhibit 1 are the usual and customary current hourly rates charged for their services in non-contingent matters, which have been accepted and approved in other complex class action litigations. The exhibit was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

5. Exhibit 2 attached hereto is a summary by category of the unreimbursed expenses incurred by my firm in connection with the prosecution of this litigation. The expenses incurred in this action are reflected on my firm's books and records, which are prepared from invoices, receipts, credit card bills, cancelled checks, wire transfer notices, expense vouchers, check records, and other source materials and represent an accurate recordation of the expenses incurred. The total expenses incurred by my firm are \$44,233.22.

6. Exhibit 3 sets forth the biographies of the principal attorneys from my firm who were involved in this case.

VANEK, VICKERS & MASINI PC



David P. Germaine

Dated: March 18, 2014

EXHIBIT 1**DORYX ANTITRUST LITIGATION
TIME REPORT**

Firm Name: Vanek, Vickers & Masini, PC
Reporting Period: inception through 11/13/2013

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Joseph Vanek	P	33.8	\$700	\$23,660.00
David Germaine	P	332.7	\$645	\$214,591.50
Alberto Rodriguez	A	.7	\$475	\$332.50
John Bjork	A	186.0	\$425	\$79,050.00
Alexa Johnson	A	2.0	\$425	\$850.00
Chelsey Parrott-Sheffer	PL	81.8	\$185	\$13,616.00
Jeannette Nolen	PL	3.5	\$185	\$647.50
TOTALS		640.5		\$332,747.50

P = Partner
C = Counsel
A = Associate
PL = Paralegal

EXHIBIT 2**DORYX ANTITRUST LITIGATION
EXPENSE REPORT****Firm Name: Vanek, Vickers & Masini, PC****Reporting Period: inception through 11/13/2013**

EXPENSE	AMOUNT
Litigation Fund	\$40,000.00
Travel/Hotel/Meals	\$1,612.05
Copying Services	\$856.94
Research Services	\$34.20
Telephone/Teleconference/Fax	\$0.00
FedEx/Messengers/Postage	\$697.13
Court Fees	\$842.90
Other (E-Discovery/Document Production)	\$190.00
TOTAL	\$44,233.22

EXHIBIT 3

**DORYX ANTITRUST LITIGATION
PRINCIPAL ATTORNEY BIOGRAPHIES**

Joseph M. Vanek

Mr. Vanek earned his Juris Doctor from Boston College in May, 1987 where he graduated with honors. Mr. Vanek received his undergraduate degree, Magna Cum Laude, from Creighton University in 1984.

Upon graduating from law school, Mr. Vanek became a member of the bar in the State of Illinois and the Commonwealth of Massachusetts. Mr. Vanek is also admitted to practice before the Supreme Court of the United States, as well as the United States Court of Appeals for the Third, Fifth and Ninth Federal Circuits and the United States District Court for the Northern and Central Districts of Illinois. In addition, Mr. Vanek has practiced on a pro hac vice basis throughout the country.

Mr. Vanek's practice has focused primarily on trial work in the areas of intellectual property, anti-trust litigation, and commercial litigation. The clients represented by Mr. Vanek in these matters have resided throughout the United States, as well as a number of other countries such as France, Canada, Taiwan, Bermuda, Japan, and Argentina.

An example of a case Mr. Vanek recently tried involved the infringement of a copyright for the developer of a video amusement game. The court awarded both damages and attorney's fees to Mr. Vanek's client. Mr. Vanek also has also represented the inventor of critical functions to the DVD technology which has resulted in a successful licensing campaign that has yielded an economic recovery exceeding \$200,000,000.00. In addition, Mr. Vanek represented the inventors of ergonomic keyboards which, through both licensing and litigation, resulted in a multi-million dollar recovery, and enforced a portfolio of patents relating to digital broadcast technology against an industry leading supplier which, again, resulted in a multi-million dollar recovery.

Mr. Vanek has also focused quite heavily in the area of trademark law. In this regard, Mr. Vanek has presented numerous multi-national corporations in the selection and registration of their service marks and trade marks. He has also acted as counsel in several lawsuits involving trade marks and has been repeatedly retained to evaluate the level of professional services rendered by counsel in trade mark and patent matters.

In the anti-trust area, Mr. Vanek has successfully represented a number of individual plaintiffs in price fixing claims, including cases involving territorial allocation, as well as horizontal price conspiracy. In the past decade, the price fixing claims in which he has participated have included some of the largest and best known cases, including the In Re Vitamin Litigation, both rounds of the Visa and Mastercard Litigation, the In Re Transparent Tape Litigation, the In Re Children's Ibuprofen claim, and In Re American Express Anti-Steering Rules Antitrust Litigation. Additionally, Mr. Vanek has been involved in several pharmaceutical claims involving anti-trust violations arising from the misuse of patents.

David P. Germaine

Mr. Germaine became a licensed attorney in the State of Illinois in 2001. His practice focuses primarily on the fields of Antitrust and Intellectual Property, where his involvement includes litigation, licensing, prosecution and domain name disputes.

In his antitrust practice, Mr. Germaine represents a number of individual plaintiffs in a vast array of federal and state antitrust disputes. Additionally, Mr. Germaine has served as class counsel for plaintiffs coming from a variety of industries. In this capacity, he has served as class liaison counsel in one of the largest antitrust cases in history.

Mr. Germaine earned his Juris Doctorate with a certificate in Intellectual Property from DePaul University's College of Law in 2001. At DePaul, Mr. Germaine participated on the national appellate moot court team, serving as the organization's vice-president from 2000 to 2001. He also authored the Case Note and Comment, *Regulating Rap Music: It Doesn't Melt in Your Mouth*, published in DePaul's *Journal of Art and Entertainment Law* in the spring of 2001. Mr. Germaine received a Bachelor of Arts, Magna Cum Laude, from John Carroll University in 1997.