

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE OPANA ER ANTITRUST LITIGATION	MDL No. 2580 Lead Case No. 14-cv-10150
THIS DOCUMENT RELATES TO: All End-Payor Actions	Hon. Harry D. Leinenweber

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EXHIBIT A

IN RE OPANA ER ANTITRUST LITIGATION

Hour, Lodestar and Expenses Summary Chart

Firm	Hours	Lodestar	Expenses
Labaton Sucharow	13,948.70	\$7,457,576.50	\$881,457.76
DiCello Levitt LLC	2,766.80	\$2,350,020.50	\$111,651.47
Freed Kanner London & Millen LLC	10,123.80	\$5,590,187.00	\$838,088.54
Dugan Law Firm, APLC	1,962.90	\$898,372.50	\$95,423.05
Glancy Prongay & Murray LLP	3,782.40	\$1,502,936.50	\$137,523.63
Gustafson Gluek PLLC	4,720.75	\$1,765,950.00	\$167,594.39
Hach Rose Schirripa & Cheverie LLP	2,911.70	\$1,091,074.00	\$70,136.83
Joseph Saveri Law Firm	1,753.20	\$616,212.00	\$42,434.10
Pomerantz LLP	787.70	\$328,619.50	\$20,356.45
Miller Shah LLP	989.40	\$480,220.00	\$54,974.39
Spector Roseman & Kodroff, P.C.	170.90	\$89,536.50	\$26,402.60
Thornton Law Firm LLP	3,277.60	\$1,147,160.00	\$70,358.65
Wexler Boley & Elgersma LLP	2,398.60	\$1,157,249.50	\$117,868.54
Weinstein Kitchenoff & Asher LLC	1,704.00	\$596,400.00	\$70,000.00
TOTALS	51,298.45	\$25,071,514.50	\$2,704,270.40

EXHIBIT B

IN RE OPANA ER ANTITRUST LITIGATION

Summary of Expenses Incurred on Behalf of the Class

Expense Category	Amount
Expenses Incurred To-Date	\$2,704,270.40
Invoiced But As-Yet Unpaid Expenses ¹	\$1,374,823.30
Litigation Fund Balance ²	(\$73,259.75)
Total Expense Reimbursement Request	\$4,005,833.95

Litigation Fund Payments

Expense Category	Amount
Experts	\$1,913,460
Document Database	\$255,151
Court Reporting Services	\$23,935
Jury Consultant	\$43,131
Trial Support	\$99,560
Total	\$2,335,237

¹ This includes \$132,137.52 that Class Counsel has set aside for their share of potential taxed costs sought by Endo, which are currently the subject of motion practice and an automatic stay due to Endo's bankruptcy proceedings. ECF No. 1064.

² This amount will be used to pay a portion of the outstanding unpaid invoices.

EXHIBIT C

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE OPANA ER ANTITRUST LITIGATION	MDL No. 2580 Lead Case No. 14-cv-10150
THIS DOCUMENT RELATES TO: All End-Payor Actions	Hon. Harry D. Leinenweber

**DECLARATION OF JONATHAN GARDNER IN SUPPORT OF END-PAYOR
PLAINTIFFS’ MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND EXPENSES
ON BEHALF OF LABATON SUCHAROW LLP**

I, Jonathan Gardner, declare and state as follows:

1. I am a partner at the law firm of Labaton Sucharow LLP (“Labaton Sucharow” or the “Firm”). I submit this Declaration in support of End Payor Plaintiffs’ (“EPP”) motion for an award of attorneys’ fees and payment of costs and expenses in connection with services rendered and expenses incurred by my Firm in connection with this litigation.

2. As explained below, while Labaton Sucharow was Co-Lead Counsel for the then-proposed End-Payor Class, the litigation was overseen and managed by other partners at the Firm. As such, this Declaration is based on conversations with my former partner Gregory Ascioffa, as well as review by me, and others at my direction, of Labaton Sucharow’s business records, including contemporaneous time records and expense reports.

3. On April 2, 2015, the Court appointed Freed Kanner London & Millen, LLC and Labaton Sucharow LLP as Co-Lead Counsel for the then-proposed End-Payor Plaintiff Class. After being appointed by the Court as Co-Lead Counsel, Labaton Sucharow and Freed Kanner

sent all Class Counsel a time and expense reporting protocol and, thereafter, oversaw the monthly time and expense reporting of Class Counsel.

4. My Firm served in this role until March 9, 2022, when the Court granted EPPs' Motion to Amend Appointment of Co-Lead Counsel to substitute DiCello Levitt Gutzler LLC for Labaton Sucharow when the attorneys principally working on this case switched law firm affiliations.

5. During the period from April 2, 2015 through March 9, 2022, my Firm, as Co-Lead Counsel, oversaw and participated in all aspects of the litigation, which are described in detail in the accompanying Declaration of Co-Lead Counsel Karin E. Garvey and Robert J. Wozniak in Support of End-Payor Plaintiffs' Motion for Payment of Attorneys' Fees, Reimbursement of Expenses, and Class Representative Service Awards. As a summary of some of this effort, during the litigation Labaton Sucharow performed the following activities on behalf of the EPPs:

- Overseeing EPPs' review of documents produced by Defendants;
- Overseeing EPPs' production of documents in response to Defendants' discovery requests;
- Preparing discovery requests (document requests and interrogatories) to Defendants;
- Preparing responses and objections to discovery sought of EPPs;
- Examining Defendants' fact and expert witnesses;
- Managing and overseeing work performed by Plaintiffs' experts (including those retained exclusively by EPPs);
- Defending Plaintiffs' fact and expert witnesses;
- Preparing EPPs' class certification motion, reply, and Rule 23(f) opposition; and
- Preparing oppositions to Defendants' summary judgment motions.

6. As Co-Lead Counsel, my Firm also employed and supervised a team of document review attorneys, who reviewed and analyzed the electronic discovery produced in the litigation by Defendants and third-parties at the Firm's offices at 140 Broadway, New York, NY from June 2016 through November 2018.

7. The review team was comprised of experienced attorneys who had worked on other antitrust or pharmaceutical cases and were well-versed in utilizing the latest document review technology. Co-Lead Counsel developed a coding guide for the attorneys to use, as well as other shared reference material. Having the document review teamwork in shared office space created efficiencies and allowed for the direct exchange of information, ideas and strategies among the review team, which benefitted the Classes. Regular conferences were held with the litigation team and senior attorneys to discuss the results of the review and strategies for the ongoing review. Review team members also assisted with the analysis of assertions of privilege and in the preparation for depositions, expert discovery, and class certification.

8. Because document review is a collaborative and iterative process, my Firm offered Class Counsel firms Gustafson Gluek PLLC; Weinstein, Kitchenoff & Asher LLC; Thornton Law Firm LLP; and Glancy Prongay & Murray LLP the opportunity to use review attorneys employed by Labaton Sucharow to work together with other review attorneys at our office. Labaton Sucharow paid the hourly rates of the attorneys, each of whom were employees of Labaton Sucharow, and was reimbursed by Class Counsel on a monthly basis for the time of the review attorneys. From July 2016 until early 2018, my Firm was reimbursed for the work of five review attorneys: Migiwa Hayashi, Marie Mukete, John Heim, Robert Carrigan, and Ayoola Badejo. The time of these attorneys is being reported in the individual declarations of the four Class Counsel firms. None of their time is reported herein.

9. Throughout the litigation, my Firm has abided by the fee and expense protocol as we performed work and incurred expenses. My Firm's submission of its compensable time and reimbursable expenses in this Declaration and its exhibits comports with the time and expense reporting protocol. The information in this Declaration regarding the Firm's time and expenses is taken from time and expense reports and supporting documentation prepared and/or maintained by the Firm in the ordinary course of business. I, together with others assisting me, reviewed these reports in connection with the preparation of this Declaration. As a result of this review, reductions were made to both time and expenses in the exercise of billing judgment. Based on this review and the adjustments made, I believe that the time reflected in the Firm's lodestar calculation and the expenses for which payment is sought are reasonable and were necessary for the effective and efficient prosecution and resolution of the litigation.

10. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the partners, attorneys and other professional support staff of my Firm in this litigation. The lodestar calculation is based on my Firm's historical hourly rates, except for work done on first-tier document review, which was capped at \$350 per hour, from April 2, 2015 through March 4, 2022. The other hourly rates for the partners, attorneys, and professional support staff in my Firm are the same as the usual and customary hourly rates used for their services in other contingent matters.

11. After the reductions referred to above, the number of hours expended on this litigation by my Firm from April 2, 2015 through March 4, 2022, is 13,948.7 hours. The lodestar for my Firm is \$7,457,576.50. The hours were determined by the examination of contemporaneous, daily time records regularly prepared and maintained by my Firm, which have been provided to current EPP Co-Lead Counsel for their review.

12. As detailed in Exhibit 2, my Firm has incurred \$881,457.76 in expenses during the period from April 2, 2015 through March 4, 2022.

13. The expenses incurred in this litigation are reflected on the books and records of my Firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 11th day of October, 2022 at New York, NY.



JONATHAN GARDNER

Exhibit 1

EXHIBIT 1

In re Opana ER Antitrust Litigation
 Labaton Sucharow LLP
 April 2, 2015 through March 4, 2022

- (1) Investigations
- (2) Discovery
- (3) Pleadings, Briefs
- (4) Court Appearances & Preparation

- (5) Settlement
- (6) Class Certification
- (7) Trial & Preparation
- (8) Case Management & Litigation Strategy

Name	Status	1	2	3	4	5	6	7	8	Historical Hourly Rate	Cumulative Hours	Cumulative Lodestar
Asciolla, G.	P	0.3		31.9		0.8			36.5	\$825.00	69.5	\$57,337.50
Asciolla, G.	P	0.2	19.5	10.2	18.6	5.2			60.6	\$875.00	114.3	\$100,012.50
Asciolla, G.	P		4.8		31.3	19.9	0.6		19.0	\$900.00	75.6	\$68,040.00
Asciolla, G.	P		2.2		1.4	3.9	38.5		9.8	\$950.00	55.8	\$53,010.00
Asciolla, G.	P			0.6		3.1	0.3	0.5	16.3	\$995.00	20.8	\$20,696.00
Asciolla, G.	P	0.9	0.3	10.2	1.1	7.6	1.3	3.8	25.8	\$1,025.00	51.0	\$52,275.00
Asciolla, G.	P					6.3			0.6	\$1,100.00	6.9	\$7,590.00
Garvey, K.	OC	29.9	1,236.7	39.3	71.0	25.4	0.8	0.1	422.8	\$775.00	1,826.0	\$1,415,150.00
Garvey, K.	P		50.6	16.5	0.4	2.3	132.6		388.2	\$875.00	590.6	\$516,775.00
Garvey, K.	P	0.4	9.3	254.9	11.8	16.9	6.8	83.2	264.8	\$925.00	648.1	\$599,492.50
Garvey, K.	P			0.8		8.0		13.2	4.1	\$975.00	26.1	\$25,447.50
Himes, J.	P			56.5			0.7		15.3	\$925.00	72.5	\$67,062.50
Himes, J.	P	0.1	20.8	27.8		1.5			41.3	\$950.00	91.5	\$86,925.00
Himes, J.	P		5.0			0.5	3.2		21.1	\$975.00	29.8	\$29,055.00
Himes, J.	P			0.1			0.2		0.6	\$1,100.00	0.9	\$990.00
Himes, J.	SC			0.6					0.8	\$1,100.00	1.4	\$1,540.00
Perez, M.	A		0.7	253.1					9.8	\$475.00	263.6	\$125,210.00

Exhibit 2

EXHIBIT 2

In re Opana ER Antitrust Litigation
Labaton Sucharow LLP
April 2, 2015 through March 4, 2022

<i>Expense</i>	<i>Amount</i>
Filing, Witness and Other Court Fees	\$150.00
Transportation, Hotels & Meals	\$65,762.35
Long Distance Telephone/Conference Calling	\$4,089.51
Messenger, Overnight Delivery	\$996.75
Secretarial OT, Word Processing	\$6,060.00
Duplicating	\$30,119.47
Electronic Research	\$30,779.68
Litigation Fund Contribution	\$743,500.00
<i>TOTAL</i>	<i>\$881,457.76</i>

EXHIBIT D

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE OPANA ER ANTITRUST LITIGATION	MDL No. 2580
THIS DOCUMENT RELATES TO: All End-Payor Actions	Lead Case No. 14-cv-10150 Hon. Harry D. Leinenweber

**DECLARATION OF KARIN E. GARVEY IN SUPPORT OF END-PAYOR
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES
ON BEHALF OF DICELLO LEVITT LLC**

I, Karin E. Garvey, declare and state as follows:

1. I am a partner at the law firm DiCello Levitt LLC. I submit this Declaration in support of End Payor Plaintiffs' ("EPP") motion for an award of attorneys' fees and reimbursement of costs and expenses in connection with services rendered and expenses incurred by my firm in connection with this litigation.

2. On April 2, 2015, the Court appointed Labaton Sucharow LLP, along with Freed Kanner London & Millen LLC, as Interim Co-Lead Counsel for the then-proposed End-Payor Plaintiff Class. ECF No. 78. On March 7, 2022, I and the attorneys principally working on this action at Labaton Sucharow switched law firm affiliations to DiCello Levitt. On March 8, 2022, DiCello Levitt moved to amend the appointment of co-lead counsel to substitute DiCello Levitt for Labaton Sucharow. ECF No. 785. The Court granted the motion on May 9, 2022. ECF No. 786.

3. Since DiCello Levitt began litigating the case, my firm has continued to abide by the established time and expense reporting protocol that has been in place since April 2, 2015. My firm's submission of its compensable time and reimbursable expenses in this Declaration and its exhibits comports with this time and expense reporting protocol.

4. My firm has been involved in the following activities on behalf of the EPPs:

- preparing the case for trial, including all fact witness, expert witness, and exhibit work;
- preparing briefs in support of and in opposition to more than 30 motions *in limine*;
- presenting the full case to a jury for over three weeks; and
- engaging in negotiations and finalizing the execution of a settlement agreement.

5. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the partners, attorneys, and other professional support staff of my firm in this litigation, from March 7, 2022 through August 24, 2022. The hourly rates for the partners, attorneys, and professional support staff at my firm are the same as the usual and customary hourly rates used for their services in contingent matters.

6. The total number of hours expended on this litigation by my firm from March 7, 2022, through August 24, 2022, is 2,766.8 hours. The total lodestar for my firm is \$2,350,020.50. The total hours were determined by the examination of contemporaneous, daily time records regularly prepared and maintained by my firm.

7. As detailed in Exhibit 2, my firm has incurred a total of \$111,651.47 in unreimbursed expenses during the period from March 7, 2022, through August 24, 2022.

8. The unreimbursed expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials and represent an accurate record of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 10th day of October, 2022 at New York, New York.

/s/ Karin E. Garvey _____
Karin E. Garvey

EXHIBIT 1

**OPANA ER
TIME REPORT**

Firm Name: DiCello Levitt

Reporting Period: March 7, 2022 - August 24, 2022

- (1) Investigations
- (2) Discovery
- (3) Pleadings, Briefs
- (4) Court Appearances & Preparation
- (5) Settlement
- (6) Class Certification
- (7) Trial & Preparation
- (8) Case Management & Litigation Strategy

Name	Status	1	2	3	4	5	6	7	8	Current Hourly Rate	Cumulative Hours	Cumulative Lodestar
Greg Asciola	P	0.0	0.6	6.3	4.7	6.8	0.0	88.4	17.1	\$1,100.00	123.9	\$136,290.00
Karin Garvey	P	0.0	4.2	17.2	7.9	31.6	0.0	729.2	88.6	\$1,010.00	878.7	\$887,487.00
Matt Perez	P	0.5	5.5	35.6	47.4	16.2	0.0	638.0	125.4	\$1,010.00	868.6	\$877,286.00
James Ulwick	A	0.0	6.8	7.2	0.0	0.0	0.0	0.0	0.0	\$665.00	14.0	\$9,310.00
John Crevier	A	0.0	6.8	3.7	2.4	2.3	0.0	317.3	54.2	\$625.00	386.7	\$241,687.50
Adrian Saldana	PL	0.0	0.0	0.0	0.0	0.0	0.0	468.6	26.3	\$400.00	494.9	\$197,960.00
											0.0	\$0.00
											0.0	\$0.00
											0.0	\$0.00
TOTALS		0.5	23.9	70.0	62.4	56.9	0.0	2,241.5	311.6		2,766.8	\$2,350,020.50

Partner (P)
Of Counsel (OC)
Associate (A)
Paralegal (PL)

EXHIBIT 2

**OPANA ER
EXPENSE REPORT**

**Firm Name: DiCello Levitt
Reporting Period: March 7, 2022 - August 24, 2022**

Disbursement	Cumulative Amount
Electronic Research	\$0.00
Filing / Misc. Fees	\$6,326.10
Litigation Fund Contribution	\$75,000.00
Overnight Delivery/Messengers	\$170.55
Photocopying	\$0.00
Postage	\$0.00
Service of Process Fees	\$0.00
Telephone / Fax	\$0.00
Transportation / Meals / Lodging	\$30,154.82
Co-Counsel Fees	\$0.00
Expert Fees	\$0.00
Secretarial OT / Word Processing	\$0.00
Court Reporter Service/Transcript Fees	\$0.00
Microfilm / Video / Disks Duplication	\$0.00
TOTAL	\$111,651.47

EXHIBIT E

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE OPANA ER ANTITRUST LITIGATION	MDL No. 2580
THIS DOCUMENT RELATES TO: All End-Payor Actions	Lead Case No. 14-cv-10150 Hon. Harry D. Leinenweber

**DECLARATION OF ROBERT J. WOZNIAK IN SUPPORT OF END-PAYOR
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORENYS' FEES AND EXPENSES
ON BEHALF OF FREED KANNER LONDON & MILLEN LLC**

I, Robert J. Wozniak, declare and state as follows:

1. I am a partner at the law firm Freed Kanner London & Millen LLC ("Freed Kanner"). I submit this Declaration in support of End Payor Plaintiffs' ("EPP") motion for an award of attorneys' fees and reimbursement of costs and expenses in connection with services rendered and expenses incurred by my firm in connection with this litigation.

2. On April 2, 2015, the Court appointed Freed Kanner, together with Labaton Sucharow LLP, as Interim Co-Lead Counsel for the then-proposed End-Payor Plaintiff Class. ECF No. 78. On March 7, 2022, the attorneys principally working on this action at Labaton Sucharow switched law firm affiliations to DiCello Levitt. On March 8, 2022, DiCello Levitt moved to amend the appointment of co-lead counsel to substitute DiCello Levitt for Labaton Sucharow. ECF No. 785. The Court granted the motion on May 9, 2022. ECF No. 786.

3. As Co-Lead Counsel, Freed Kanner abided by the time and expense reporting protocol for all Class Counsel firms throughout this litigation in performing work, incurring

expenses, and submitting monthly reports of all time and expenses. My firm's submission of its compensable time and reimbursable expenses in this Declaration and accompanying exhibits comports with this time and expense reporting protocol.

4. During the period from April 2, 2015, through August 24, 2022, as EPP Co-Lead Counsel, my firm was involved in all aspects of the work described in my Joint Declaration with Karin E. Garvey. Among other things, that work included: engaging in all aspects of fact and expert discovery; drafting and filing pleadings in connection with motions to dismiss, discovery disputes, class certification, summary judgment, and *Daubert* motions; preparing the case for trial, including all fact witness, expert witness, and exhibit work; preparing briefs in support of and in opposition to more than 30 motions *in limine*; presenting the full case to a jury for over three weeks; and engaging in negotiations and finalizing the execution of a settlement agreement.

5. The schedule attached hereto as **Exhibit 1** is a detailed summary indicating the amount of time spent by the partners, attorneys and other professional support staff of Freed Kanner. The lodestar calculation is based on my firm's historic hourly billing rates, except for work done on first-tier document review, which was capped at \$350 per hour, from April 2, 2015, through August 24, 2022.

6. The total number of hours expended on this litigation by my firm from April 2, 2015, through August 24, 2022, is 10,123.80 hours. The total lodestar for my firm is \$5,590,187.00. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. The total hours were determined by the examination of contemporaneous, daily time records regularly prepared and maintained by my firm, and which were provided to EPP Co-Lead Counsel for their review.

7. As detailed in **Exhibit 2**, my firm incurred a total of \$838,088.54 in unreimbursed expenses during the period from April 2, 2015, through August 24, 2022.

8. The unreimbursed expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate record of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 10th day of October, 2022 at Bannockburn, Illinois.

Robert J. Wozniak
Robert J. Wozniak

EXHIBIT 1

**OPANA ER
TIME REPORT**
Firm Name: Freed Kanner London & Millen LLC
Reporting Period: April 2, 2015 - August 24, 2022

- (1) Investigations
- (2) Discovery
- (3) Pleadings, Briefs
- (4) Court Appearances & Preparation
- (5) Settlement
- (6) Class Certification
- (7) Trial & Preparation
- (8) Case Management & Litigation Strategy

Name	Status	1	2	3	4	5	6	7	8	Current Hourly Rate	Total Hours This Period	Lodestar This Period	Cumulative Hours	Cumulative Lodestar
Michael J. Freed	P									\$835.00	0.0	\$0.00	25.4	\$21,209.00
Michael J. Freed	P									\$845.00	0.0	\$0.00	27.4	\$23,153.00
Michael J. Freed	P									\$855.00	0.0	\$0.00	125.0	\$106,875.00
Michael J. Freed	P									\$880.00	0.0	\$0.00	24.0	\$21,120.00
Michael J. Freed	P									\$895.00	0.0	\$0.00	31.4	\$28,103.00
Michael J. Freed	P									\$910.00	0.0	\$0.00	34.3	\$31,213.00
Michael J. Freed	P									\$925.00	0.0	\$0.00	14.7	\$13,597.50
Michael J. Freed	P									\$940.00	0.0	\$0.00	39.0	\$36,660.00
Michael J. Freed	P									\$970.00	0.0	\$0.00	27.7	\$26,869.00
Michael J. Freed	P									\$1,050.00	0.0	\$0.00	100.4	\$105,420.00
Michael J. Freed	P									\$1,125.00	0.0	\$0.00	50.7	\$57,037.50
Douglas A. Millen	P									\$680.00	0.0	\$0.00	0.9	\$612.00
Douglas A. Millen	P									\$700.00	0.0	\$0.00	3.9	\$2,730.00
Douglas A. Millen	P									\$725.00	0.0	\$0.00	2.3	\$1,667.50
Douglas A. Millen	P									\$740.00	0.0	\$0.00	5.7	\$4,218.00
Douglas A. Millen	P									\$755.00	0.0	\$0.00	2.1	\$1,585.50
Douglas A. Millen	P									\$785.00	0.0	\$0.00	2.3	\$1,805.50
Douglas A. Millen	P									\$805.00	0.0	\$0.00	12.5	\$10,062.50
Douglas A. Millen	P									\$925.00	0.0	\$0.00	11.6	\$10,730.00
Robert J. Wozniak	P									\$610.00	0.0	\$0.00	71.4	\$43,554.00
Robert J. Wozniak	P									\$630.00	0.0	\$0.00	95.2	\$59,976.00
Robert J. Wozniak	P									\$640.00	0.0	\$0.00	416.4	\$266,496.00
Robert J. Wozniak	P									\$660.00	0.0	\$0.00	113.3	\$74,778.00
Robert J. Wozniak	P									\$675.00	0.0	\$0.00	239.3	\$161,527.50
Robert J. Wozniak	P									\$690.00	0.0	\$0.00	192.9	\$133,101.00
Robert J. Wozniak	P									\$705.00	0.0	\$0.00	198.3	\$139,801.50
Robert J. Wozniak	P									\$720.00	0.0	\$0.00	520.8	\$374,976.00
Robert J. Wozniak	P									\$750.00	0.0	\$0.00	332.1	\$249,075.00
Robert J. Wozniak	P									\$800.00	0.0	\$0.00	502.3	\$401,840.00
Robert J. Wozniak	P									\$850.00	0.0	\$0.00	679.8	\$577,830.00
Jonathan M. Jagher	P									\$640.00	0.0	\$0.00	21.2	\$13,568.00
Kimberly Justice	P									\$820.00	0.0	\$0.00	30.9	\$25,338.00
Kimberly A. Justice	P									\$925.00	0.0	\$0.00	1.5	\$1,387.50
Donald L. Sawyer	A									\$440.00	0.0	\$0.00	8.6	\$3,784.00
Donald L. Sawyer	A									\$460.00	0.0	\$0.00	0.8	\$368.00
Donald L. Sawyer	A									\$470.00	0.0	\$0.00	3.1	\$1,457.00
Christopher Stuart	OC									\$350.00	0.0	\$0.00	2,469.5	\$864,325.00
Steve Serdikoff	OC									\$350.00	0.0	\$0.00	1,526.0	\$534,100.00

EXHIBIT 2

**OPANA ER
EXPENSE REPORT**

**Firm Name: Freed Kanner London & Millen LLC
Reporting Period: April 2, 2015 - August 24, 2022**

Disbursement	Current Amount	Cumulative Amount
Electronic Research		\$14,378.35
Filing / Misc. Fees		\$1,556.24
Litigation Fund Contribution		\$785,000.00
Overnight Delivery/Messengers		\$0.00
Photocopying		\$2,011.84
Postage		\$838.87
Service of Process Fees		\$0.00
Telephone / Fax		\$483.29
Transportation / Meals / Lodging		\$33,620.25
Co-Counsel Fees		\$0.00
Expert Fees		\$0.00
Secretarial OT / Word Processing		\$0.00
Court Reporter Service/Transcript Fees		\$199.70
Microfilm / Video / Disks Duplication		\$0.00
TOTAL	\$0.00	\$838,088.54

EXHIBIT F

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE OPANA ER ANTITRUST LITIGATION	MDL No. 2580
THIS DOCUMENT RELATES TO: All End-Payor Actions	Lead Case No. 14-cv-10150 Hon. Harry D. Leinenweber

**DECLARATION OF JAMES R. DUGAN, II IN SUPPORT OF END-PAYOR
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORENYS' FEES AND EXPENSES
ON BEHALF OF THE DUGAN LAW FIRM**

I, JAMES R. DUGAN II, declare and state as follows:

1. I am the founding partner at the Dugan Law Firm (DLF). I submit this Declaration in support of End Payor Plaintiffs' ("EPP") motion for an award of attorneys' fees and reimbursement of costs and expenses in connection with services rendered and expenses incurred by my firm in connection with this litigation. The Dugan Law Firm represents Louisiana Health Service & Indemnity Company d/b/a Blue Cross and Blue Shield of Louisiana (BCBSLA), on whose behalf DLF filed a class action complaint in 2014.

2. EPP Co-Lead Counsel sent all Class Counsel, including my firm, time and expense reporting protocol after being appointed by the Court on April 2, 2015. Throughout this litigation, my firm has abided by this protocol as we have performed work, incurred expenses, and submitted monthly reports of our time and expenses. My firm's submission of its compensable time and reimbursable expenses in this Declaration and its exhibits comports with this time and expense reporting protocol.

3. During the period from April 2, 2015, through August 24, 2022, and at the direction of EPP Co-Lead Counsel, my firm has been involved in the following activities on behalf of the EPPs:

- Identified, collected, reviewed for responsiveness and privilege, and produced documents from class representative BCBSLA;
- Assisted EPP Co-Lead Counsel with preparation for defending class representative BCBSLA 30(b)(6) designees Mollie Carby and Justin Thomas at deposition, including but not limited to review and selection of documents that may be used during the deposition, as well as participation in preparation sessions as well as the depositions for both witnesses, and;
- Assisted EPP Co-Lead Counsel with preparation for trial by designating the documents and testimony of class representative BCBSLA for trial, providing objections to the defendants' counter designations and exhibits, and providing counter designations of BCBSLA testimony in response to the defendants designations and objections.

4. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the partners, attorneys and other professional support staff of my firm in this litigation. The lodestar calculation is based on my firm's historic hourly billing rates, except for work done on first-tier document review if any, which was capped at \$350 per hour, from April 2, 2015, through August 24, 2022.

5. The total number of hours expended on this litigation by my firm from April 2, 2015, through August 24, 2022, is 1,962.9 hours. The total lodestar for my firm is \$ 898,372.50. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. The total hours were determined by the examination of contemporaneous, daily time records regularly prepared and maintained by my firm, and which have been provided to EPP Co-Lead Counsel for their review.

6. As detailed in Exhibit 2, my firm has incurred a total of \$95,423.05 in unreimbursed expenses during the period from April 2, 2015, through August 24, 2022.

7. The unreimbursed expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 7th day of October, 2022 at New Orleans, LA.

James R. Dugan, II
James R. Dugan, II

EXHIBIT 1

Dugan Law Firm Historical Lodestar Reporting for Opana

2015 (Apr 2, 2015-Dec 31, 2015)

Staff	Total Duration	Rate	Lodestar
James Dugan	41.0	650	26,650.00
Douglas Plymale	11.5	625	7,187.50
Total Duration	52.5	Total Lodestar	33,837.50

2016 (Jan 1, 2016-Dec 31, 2016)

Staff	Total Duration	Rate	Lodestar
James Dugan	0.6	675	405.00
Douglas Plymale	17.7	650	11,505.00
Total Duration	18.3	Total Lodestar	11,910.00

2017 (Jan 1, 2017-Dec 31, 2017)

Staff	Total Duration	Rate	Lodestar
Lanson Bordelon	20.3	400	8,120.00
James Dugan	7.2	675	4,860.00
Bonnie Kendrick	10.8	475	5,130.00
Douglas Plymale	34.2	650	22,230.00
Total Duration	72.5	Total Lodestar	40,340.00

2018 (Jan 1, 2018-Dec 31, 2018)

Staff	Total Duration	Rate	Lodestar
Lanson Bordelon	1.4	400	560.00
James Dugan	67.3	700	47,110.00
Bonnie Kendrick	294.7	475	139,982.50
James Perelman	1146.3	350	401,205.00
Douglas Plymale	173.5	675	117,112.50
Monique Poirrier	0.6	150	90.00
David Scalia	66.1	700	46,270.00
Total Duration	1749.9	Total Lodestar	752,330.00

2019 (Jan 1, 2019-Dec 31, 2019)

Staff	Total Duration	Rate	Lodestar
TerriAnne Benedetto	0.1	750	75.00
James Dugan	1.2	800	960.00
Douglas Plymale	9.2	725	6,670.00
David Scalia	2.8	750	2,100.00
Total Duration	13.3	Total Lodestar	9,805.00

2020 (Jan 1, 2020-Dec 31, 2020)

Staff	Total Duration	Rate	Lodestar
TerriAnne Benedetto	1.2	825	990.00
Douglas Plymale	1.1	775	852.50
David Scalia	0.3	825	247.50
Total Duration	2.6	Total Lodestar	2,090.00

Dugan Law Firm Historical Lodestar Reporting for Opana

2021 (Jan 1, 2021-Dec 31, 2021)

Staff	Total Duration	Rate	Lodestar
James Dugan	0.3	925	277.50
Danielle Hufft	0.1	675	67.50
Douglas Plymale	6.6	825	5,445.00
David Scalia	1.9	875	1,662.50
Total Duration	8.9	Total Lodestar	7,452.50

2022 (Jan 1, 2022-Aug 31, 2022)

Staff	Total Duration	Rate	Lodestar
James Dugan	3.5	975	3,412.50
Danielle Hufft	4.4	675	2,970.00
David Scalia	37.0	925	34,225.00
Total Duration	44.9	Total Lodestar	40,607.50

LODESTAR TOTALS DUGAN LAW FIRM	898,372.50
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EXHIBIT 2

3:54 PM

10/07/22

Accrual Basis

The Dugan Law Firm
Account QuickReport
All Transactions

Type	Date	Num	Source Name	Memo	Amount	Balance
17000 · Client costs Receivable						
Class Action Cases						
Opana						
Bill	11/17/2014		Douglas R. Plymale, LLC	Filing fee \$ 4...	400.00	400.00
Credit Card Charge	11/21/2014		LAMD		221.00	621.00
Credit Card Charge	11/21/2014		USDC, Middle District of Loui...		221.00	842.00
Check	11/24/2014	1960	TOM CASSISA, PROCESS S...	inv 14698	142.20	984.20
Check	12/01/2014	1965	Clerk of the Supreme Court of...	Cert of good ...	10.00	994.20
Check	02/18/2015	2064	Scott Joanen	Opana Heari...	44.46	1,038.66
Check	02/18/2015	2064	Scott Joanen	Opana Heari...	45.66	1,084.32
Check	02/18/2015	2064	Scott Joanen	Opana Heari...	8.85	1,093.17
Check	02/18/2015	2064	Scott Joanen	Opana Heari...	34.00	1,127.17
Check	02/18/2015	2064	Scott Joanen	Opana Heari...	373.20	1,500.37
Check	02/18/2015	2064	Scott Joanen	Opana Heari...	189.78	1,690.15
Credit Card Charge	04/24/2015		USDC, SDIL		176.00	1,866.15
Check	08/01/2017	4052	Pacer Service Center	inv 2761351-...	5.10	1,871.25
Credit Card Charge	11/03/2017		Federal Express	770629501777	29.08	1,900.33
Credit Card Charge	01/23/2018		Federal Express		18.85	1,919.18
Credit Card Charge	05/31/2018		Pacer Service Center	BCBS	2.90	1,922.08
General Journal	06/08/2018	Postage			6.55	1,928.63
Bill	10/04/2018		Reggie-Tech, LLC	database and...	9,750.00	11,678.63
Check	12/07/2018	4672	David Scalia	BCBSLA 306...	180.91	11,859.54
Check	12/07/2018	4672	David Scalia	BCBSLA 306...	44.05	11,903.59
Credit Card Charge	01/14/2019		ILND CM ECF	Pro vac Scalia	150.00	12,053.59
Credit Card Charge	08/27/2019		Pacer Service Center	BCBS	4.00	12,057.59
Credit Card Charge	11/03/2020		Pacer Service Center		12.90	12,070.49
Check	01/14/2021	1728	TerriAnne Benedetto	Reimb Expen...	3.00	12,073.49
Check	01/25/2022	1935	Labaton Sucharow LLP	assessment	75,000.00	87,073.49
Credit Card Charge	01/26/2022		Federal Express		20.01	87,093.50
Check	06/01/2022	wire	Dicello Levitt	assessment	10,000.00	97,093.50
Credit Card Charge	07/11/2022		Pacer Service Center	06 22 DS	3.20	97,096.70
Credit Card Charge	07/13/2022		Pacer Service Center	06 22 DLF	16.50	97,113.20
Total Opana					97,113.20	97,113.20
Total Class Action Cases					97,113.20	97,113.20
Total 17000 · Client costs Receivable					97,113.20	97,113.20
TOTAL					97,113.20	97,113.20

EXHIBIT G

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE OPANA ER ANTITRUST LITIGATION	MDL No. 2580
THIS DOCUMENT RELATES TO: All End-Payor Actions	Lead Case No. 14-cv-10150 Hon. Harry D. Leinenweber

**DECLARATION OF LEE ALBERT IN SUPPORT OF END-PAYOR PLAINTIFFS’
MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND EXPENSES
ON BEHALF OF GLANCY PRONGAY & MURRAY LLP**

I, Lee Albert, declare and state as follows:

1. I am a partner at the law firm Glancy Prongay & Murray LLP (GPM). I submit this Declaration in support of End Payor Plaintiffs’ (“EPP”) motion for an award of attorneys’ fees and reimbursement of costs and expenses in connection with services rendered and expenses incurred by my firm in connection with this litigation.

2. EPP Co-Lead Counsel sent all Class Counsel, including my firm, time and expense reporting protocol after being appointed by the Court on April 2, 2015. Throughout this litigation, my firm has abided by this protocol as we have performed work, incurred expenses, and submitted monthly reports of our time and expenses. My firm’s submission of its compensable time and reimbursable expenses in this Declaration and its exhibits comports with this time and expense reporting protocol.

3. During the period from April 2, 2015, through August 24, 2022, and at the direction of EPP Co-Lead Counsel, my firm has been involved in the following activities on behalf of the EPPs:

- Assisting in the preparation of the Consolidated Amended Class Action Complaint;
- Identified, collected, reviewed, and produced documents from Plumbers 178 Health and Welfare Fund;
- GPM attorneys assisted reviewed, analyzed, and coded documents produced by defendants during discovery, at the direction of co-lead counsel;
- Assisting EPP Co-Lead Counsel in the preparation of and attending Class Representative Plumbers Local 178's deposition;
- Reviewing case filings with Class Representative Plumbers 178, including the Motion to Dismiss and all filings related thereto, and the Motion for Class Certification and all filings related thereto, including multiple calls with client and co-lead counsel;
- Meetings with Plumbers 178's Pharmacy Benefit Manager, to collect data and documents pertaining to defendants' discovery requests.
- My firm participated in discovery by using document review attorneys to analyze and code documents produced by Defendants and third-parties. Because document review is a collaborative and iterative process, Co-Lead Counsel Labaton Sucharow offered our firm (and others) the opportunity to use one document review attorney employed by Labaton Sucharow to work together with other case document reviewers at the office of Labaton Sucharow in New York. The document review team working in shared office space created efficiencies and allowed for the direct exchange of information, ideas and strategies among the review team, which benefitted the Classes. The document review attorney's hourly rate was initially paid by Labaton Sucharow, which Labaton Sucharow then recouped by invoicing my firm for these services. My firm did not directly pay the two document review attorneys. Thus, my firm ultimately paid for the document review attorney (Labaton Sucharow was fully reimbursed), and that unreimbursed lodestar time appears on Exhibit 1 to this Declaration. Labaton Sucharow is not seeking reimbursement of the cost of this document review attorney, and this document review attorney's lodestar does not appear on Exhibit 1 to Labaton Sucharow's Declaration

4. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the partners, attorneys, and other professional support staff of my firm in this litigation. The lodestar calculation is based on my firm's historic hourly billing rates, except for work done on first-tier document review, which was capped at \$350 per hour, from April 2, 2015, through August 24, 2022.

5. The total number of hours expended on this litigation by my firm from April 2, 2015, through August 24, 2022, is 3,782.4 hours. The total lodestar for my firm is \$1,502,936.50. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. The total hours of the document review attorney were determined by the examination of contemporaneous, daily time records regularly prepared and maintained by Labaton Sucharow, which have been provided to EPP Co-lead Counsel for their review."

6. As detailed in Exhibit 2, my firm has incurred a total of \$137,523.63 in unreimbursed expenses during the period from April 2, 2015, through August 24, 2022.

7. The unreimbursed expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 6, 2022 at Lafayette Hill, PA.

/s/Lee Albert
Lee Albert

EXHIBIT 1

EXHIBIT 1

GLANCY PRONGAY & MURRAY LLP

Hours Reported and Lodestar on a Historical Basis

April 2, 2015 through August 24, 2022

Timekeeper	Professional Status	Hours	Rate	Total Lodestar
Lee Albert (2015-2016)	Partner	56.3	\$755	\$42,506.50
Lee Albert (2017)	Partner	21.4	\$825	\$17,655.00
Lee Albert (2018)	Partner	60.9	\$925	\$56,332.50
Lee Albert (2019-2022)	Partner	29.9	\$975	\$29,152.50
Gregory Linkh (2015-2016)	Partner	10.4	\$650	\$6,760.00
Gregory Linkh (2017-2018)	Partner	111.5	\$725	\$80,837.50
Gregory Linkh (2019-2022)	Partner	30.1	\$900	\$27,090.00
Thomas Kennedy (2015-2016)	Associate	131.5	\$395	\$51,942.50
Thomas Kennedy (2017-2018)	Associate	111.2	\$575	\$63,940.00
William Burakoff	Of Counsel	1,213.8	\$350	\$424,830.00
John Heim	Document Review Attorney	2,005.4	\$350	\$701,890.00
Grand Total:		3,782.4		\$1,502,936.50

EXHIBIT 2

EXHIBIT 2

GLANCY PRONGAY & MURRAY LLP

Expenses

April 2, 2015 through August 24, 2022

EXPENSE CATEGORY	AMOUNT INCURRED
Assessments	\$135,000.00
Online Legal Research	\$519.25
Postage	\$12.32
Overnight Mail (FedEx, UPS)	\$15.97
Travel, Meals, & Lodging	\$1,976.09
TOTAL:	\$137,523.63

EXHIBIT H

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE OPANA ER ANTITRUST LITIGATION	MDL No. 2580
THIS DOCUMENT RELATES TO: All End-Payor Actions	Lead Case No. 14-cv-10150 Hon. Harry D. Leinenweber

**DECLARATION OF MICHELLE J. LOOBY IN SUPPORT OF END-PAYOR
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES
ON BEHALF OF GUSTAFSON GLUCK PLLC**

I, Michelle J. Looby, declare and state as follows:

1. I am a member at the law firm Gustafson Gluck PLLC (“Gustafson Gluck”). I submit this Declaration in support of End Payor Plaintiffs’ (“EPP”) motion for an award of attorneys’ fees and reimbursement of costs and expenses in connection with services rendered and expenses incurred by my firm in connection with this litigation.

2. EPP Co-Lead Counsel sent all Class Counsel, including my firm, time and expense reporting protocol after being appointed by the Court on April 2, 2015. Throughout this litigation, my firm has abided by this protocol as we have performed work, incurred expenses, and submitted monthly reports of our time and expenses. My firm’s submission of its compensable time and reimbursable expenses in this Declaration and its exhibits comports with this time and expense reporting protocol.

3. During the period from April 2, 2015, through August 24, 2022, and at the direction of EPP Co-Lead Counsel, my firm has been involved in the following activities on behalf of the EPPs:

- Identified, collected, reviewed, and produced documents from class representative Wisconsin Masons' Health Care Fund;
- Reviewed, analyzed and coded documents produced by Defendants;
- Conducted legal research and assisted in drafting opposition to defendants' motion to dismiss;
- Assisted EPP Co-Lead Counsel with preparation for defending class representative Wisconsin Masons' Health Care Fund at deposition;
- Assisted EPP Co-Lead Counsel with preparing class representative Wisconsin Masons' Health Care Fund's for testifying at trial; and
- Conducted legal research and assisted on various projects in preparation for and during trial.

4. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the partners, attorneys and other professional support staff of my firm in this litigation. The lodestar calculation is based on my firm's historic hourly billing rates, except for work done on first-tier document review, which was capped at \$350 per hour, from April 2, 2015, through August 24, 2022.

5. My firm participated in discovery by using a document review attorney to analyze and code documents produced by Defendants and third-parties. Because document review is a collaborative and iterative process, Co-Lead Counsel Labaton Sucharow offered our firm (and others) the opportunity to use a document review attorney employed by Labaton Sucharow to work together with other case document reviewers at the office of Labaton Sucharow in New York. The document review team working in shared office space created efficiencies and allowed for the direct exchange of information, ideas and strategies among the review team, which benefitted the

Classes. The document review attorney's hourly rate was initially paid by Labaton Sucharow, which Labaton Sucharow then recouped by invoicing my firm for these services. Thus, my firm ultimately paid for the document review attorney (Labaton Sucharow was fully reimbursed), and that unreimbursed lodestar time appears on Exhibit 1 to this Declaration. Labaton Sucharow is not seeking reimbursement of the cost of this document review attorney, and this document review attorney's lodestar does not appear on Exhibit 1 to Labaton Sucharow's Declaration.

6. The total number of hours expended on this litigation by my firm from April 2, 2015, through August 24, 2022, is 4,720.75 hours. The total lodestar for my firm is \$1,765,950.00. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. The total hours for the document review attorney were determined by the examination of contemporaneous, daily time records regularly prepared and maintained by Labaton Sucharow, which have been provided to EPP Co-Lead Counsel for their review.

7. As detailed in Exhibit 2, my firm has incurred a total of \$167,594.39 in unreimbursed expenses during the period from April 2, 2015, through August 24, 2022.

8. The unreimbursed expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 11th day of October, 2022 at Minneapolis, Minnesota.



Michelle J. Looby

Exhibit 1

OPANA ER
TIME REPORT
Firm Name: Gustafson Gluek PLLC
Reporting Period: April 2, 2015 - August 24, 2022

(1) Investigations
(2) Discovery
(3) Pleadings, Briefs
(4) Court Appearances & Preparation

(5) Settlement
(6) Class Certification
(7) Trial & Preparation
(8) Case Management & Litigation Strategy

Name	Status	1	2	3	4	5	6	7	8	Current Hourly Rate	Cumulative Hours	Cumulative Lodestar
Daniel E Gustafson	P									\$900 00	0 00	\$0 00
Daniel E Gustafson	P			2 25					1 75	\$950 00	4 00	\$3,800 00
Daniel E Gustafson	P		1 25	0 25					0 75	\$975 00	2 25	\$2,193 75
Daniel E Gustafson	P									\$1,025 00	0 00	\$0 00
Daniel E Gustafson	P								1 25	\$1,075 00	1 25	\$1,343 75
Daniel E Gustafson	P								1 00	\$1,100 00	1 00	\$1,100 00
Daniel E Gustafson	P					0 50		1 25		\$1,200 00	2 25	\$2,700 00
Karla M Gluek	P			0 25						\$825 00	0 50	\$412 50
Karla M Gluek	P		3 50	0 50					2 50	\$875 00	6 50	\$5,687 50
Karla M Gluek	P		0 25						1 50	\$900 00	1 75	\$1,575 00
Karla M Gluek	P		0 50						1 00	\$925 00	1 50	\$1,387 50
Karla M Gluek	P					0 25		1 00		\$1,000 00	1 25	\$1,250 00
Jason S Kilene	P									\$700 00	0 00	\$0 00
Jason S Kilene	P		9 25	3 00					1 50	\$750 00	13 75	\$10,312 50
Jason S Kilene	P		1 25							\$800 00	1 25	\$1,000 00
Jason S Kilene	P		7 00						0 25	\$850 00	7 25	\$6,162 50
Jason S Kilene	P		1 75							\$875 00	1 75	\$1,531 25
Jason S Kilene	P								0 25	\$900 00	0 25	\$225 00
Jason S Kilene	P			1 00					0 50	\$925 00	1 50	\$1,387 50
Jason S Kilene	P					0 50				\$950 00	0 50	\$475 00
Michelle J Looby	P									\$450 00	0 00	\$0 00
Michelle J Looby	P		13 00	1 25					8 25	\$500 00	22 50	\$11,250 00
Michelle J Looby	P		14 25	0 50					3 00	\$600 00	17 75	\$10,650 00
Michelle J Looby	P		47 75	1 50					3 00	\$625 00	52 25	\$32,656 25
Michelle J Looby	P		4 50	1 25			0 25		2 00	\$650 00	8 00	\$5,200 00
Michelle J Looby	P		0 25	5 75					9 00	\$675 00	15 00	\$10,125 00
Michelle J Looby	P			0 25		3 25		110 00	3 75	\$775 00	117 25	\$90,868 75
Sara J Payne	A									\$400 00	0 00	\$0 00
Sara J Payne	A			21 50					0 25	\$425 00	21 75	\$9,243 75
Sara J Payne	A								0 50	\$450 00	0 50	\$225 00
Joshua J Rissman	A									\$400 00	0 00	\$0 00
Joshua J Rissman	A	0 25	9 25	0 25					1 00	\$425 00	10 75	\$4,568 75
Joshua J Rissman	A		25 75						0 50	\$450 00	26 25	\$11,812 50
Joshua J Rissman	P	3 50	65 00						2 00	\$475 00	70 50	\$33,487 50
Joshua J Rissman	P		3 50						0 50	\$500 00	4 00	\$2,000 00
Joshua J Rissman	P			3 50			1 00		6 50	\$600 00	11 00	\$6,600 00
Joshua J Rissman	P		0 75	1 00				23 75	0 75	\$675 00	26 25	\$17,718 75
Daniel J Nordin	A		12 50	0 50						\$375 00	13 00	\$4,875 00
Daniel J Nordin	A		2 25							\$425 00	2 25	\$956 25
Abou B Amara	A							46 00	0 25	\$375 00	46 25	\$17,343 75
Johanna K Smith	A			14 50						\$300 00	14 50	\$4,350 00
Robert Carrigan	DRA		4,047 50							\$350 00	4,047 50	\$1,416,625 00
Diana Jakubauskiene	PL		7 00	1 75					73 75	\$200 00	82 50	\$16,500 00
Diana Jakubauskiene	PL		0 50					0 50	49 50	\$300 00	50 50	\$15,150 00
Shaurae Williams	PL								12 00	\$100 00	12 00	\$1,200 00
TOTALS		3.75	4,278.50	60.75	0.00	4.50	1.25	182.50	189.50		4,720.75	\$1,765,950.00

Partner (P)
Of Counsel (OC)
Associate (A)
Paralegal (PL)

Exhibit 2

**OPANA ER
EXPENSE REPORT**

Firm Name: Gustafson Gluek PLLC

Reporting Period: April 2, 2015 - August 24, 2022

Disbursement	Cumulative Amount
Electronic Research	\$556.23
Filing / Misc. Fees	\$0.00
Litigation Fund Contribution	\$150,000.00
Overnight Delivery/Messengers	\$48.47
Photocopying	\$155.00
Postage	\$0.00
Service of Process Fees	\$0.00
Telephone / Fax	\$67.41
Transportation / Meals / Lodging / Airfare	\$5,468.72
Co-Counsel Fees	\$0.00
Expert Fees	\$190.63
Secretarial OT / Word Processing	\$0.00
Court Reporter Service/Transcript Fees	\$0.00
Microfilm / Video / Disks Duplication	\$0.00
Other: Epiq Database	\$11,107.93
TOTAL	\$167,594.39

EXHIBIT I

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE OPANA ER ANTITRUST
LITIGATION

MDL No. 2580

Lead Case No. 14-cv-10150

THIS DOCUMENT RELATES TO:

Hon. Harry D. Leinenweber

All End-Payor Actions

**DECLARATION OF FRANK R. SCHIRRIPIA IN SUPPORT OF END-PAYOR
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES
ON BEHALF OF HACH ROSE SCHIRRIPIA & CHEVERIE LLP**

I, Frank R. Schirripa, declare and state as follows:

1. I am a partner at the law firm Hach Rose Schirripa & Cheverie LLP. I submit this Declaration in support of End Payor Plaintiffs' ("EPP") motion for an award of attorneys' fees and reimbursement of costs and expenses in connection with services rendered and expenses incurred by my firm in connection with this litigation.

2. EPP Co-Lead Counsel sent all Class Counsel, including my firm, time and expense reporting protocol after being appointed by the Court on April 2, 2015. Throughout this litigation, my firm has abided by this protocol as we have performed work, incurred expenses, and submitted monthly reports of our time and expenses. My firm's submission of its compensable time and reimbursable expenses in this Declaration and its exhibits comports with this time and expense reporting protocol.

3. During the period from April 2, 2015, through August 24, 2022, and at the direction of EPP Co-Lead Counsel, my firm has been involved in the following activities on behalf of the EPPs:

- Identified, collected, reviewed, and produced documents from class representative International Union of Operating Engineers Local 138 Welfare Fund;
- Reviewed, analyzed and coded documents produced by Defendants;
- Assisted EPP Co-Lead Counsel with preparation for defending class representative International Union of Operating Engineers Local 138 Welfare Fund at deposition;

4. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the partners, attorneys and other professional support staff of my firm in this litigation. The lodestar calculation is based on my firm's historic hourly billing rates, except for work done on first-tier document review, which was capped at \$350 per hour, from April 2, 2015, through August 24, 2022. Time expended in preparing any papers for this motion for fees and reimbursement of expenses has not been included in this request, nor has the time of any timekeeper who devoted fewer than ten (10) hours to this litigation.


5. The total number of hours expended on this litigation by my firm from April 2, 2015, through August 24, 2022, is 2,911.7 hours. The total lodestar for my firm is \$1,091,074.00. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. The total hours were determined by the examination of contemporaneous, daily time records regularly prepared and maintained by my firm, and which have been provided to EPP Co-Lead Counsel for their review.

6. As detailed in Exhibit 2, my firm has incurred a total of \$70,136.83 in unreimbursed expenses during the period from April 2, 2015, through August 24, 2022.

7. The unreimbursed expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 5th day of October, 2022 at New York, New York.



Frank R. Schirripa

EXHIBIT 1

EXHIBIT 1

TIME REPORT

Firm Name: Hach Rose Schirripa & Cheverie, LLP

Reporting Period: April 2, 2015 - August 31, 2022

- | | |
|-------------------------------------|---|
| (1) Investigations | (5) Settlement |
| (2) Discovery | (6) Class Certification |
| (3) Pleadings, Briefs | (7) Trial & Preparation |
| (4) Court Appearances & Preparation | (8) Case Management & Litigation Strategy |

Name	Status	1	2	3	4	5	6	7	8	Historical Hourly Rate	Cumulative Hours	Cumulative Lodestar
Frank Schirripa	P		9.4	7.5					4.8	\$695.00	21.7	\$15,081.50
Frank Schirripa	P		67.9							\$725.00	67.9	\$49,227.50
Frank Schirripa	P		0.5							\$800.00	0.5	\$400.00
Frank Schirripa	P		3.3					5.2		\$925.00	8.5	\$7,862.50
Daniel Rehns	P		29.8						23.8	\$625.00	53.6	\$33,500.00
Daniel Rehns	P		45.2							\$675.00	45.2	\$30,510.00
Denis Carey	OC		2,690.4							\$350.00	2,690.4	\$941,640.00
Seth Pavsner	A								1.8	\$375.00	1.8	\$675.00
Seth Pavsner	A								1.1	\$475.00	1.1	\$522.50
Seth Pavsner	A		7.7	1.0					1.8	\$660.00	10.5	\$6,930.00
Hillary Nappi	A		10.5							\$450.00	10.5	\$4,725.00
TOTALS		0.0	2,864.7	8.5	0.0	0.0	0.0	5.2	33.3		2,911.7	\$1,091,074.00

Partner (P)

Of Counsel (OC)

Associate (A)

EXHIBIT 2

EXHIBIT 2

**In re OPANA ER Antitrust Litigation
No. 14-CV-10150
EXPENSE REPORT**

**FIRM NAME: HACH ROSE SCHIRRIPA & CHEVERIE LLP
REPORTING PERIOD: APRIL 2, 2015 through AUGUST 31, 2022**

DESCRIPTION	CUMULATIVE TOTAL
Litigation Fund Assessments	\$70,000.00
Meals, Hotels and Transportation	\$136.83
TOTAL EXPENSES	\$70,136.83

EXHIBIT J

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE OPANA ER ANTITRUST
LITIGATION

MDL No. 2580

Lead Case No. 14-cv-10150

THIS DOCUMENT RELATES TO:

Hon. Harry D. Leinenweber

All End-Payor Actions

**DECLARATION OF JOSEPH R. SAVERI IN SUPPORT OF END-PAYOR
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEY' FEES AND EXPENSES
ON BEHALF OF JOSEPH SAVERI LAW FIRM, LLP**

I, Joseph R. Saveri, declare and state as follows:

1. I am a partner at the law firm Joseph Saveri Law Firm, LLP ("JSLF"). I submit this Declaration in support of End Payor Plaintiffs' ("EPP") motion for an award of attorneys' fees and reimbursement of costs and expenses in connection with services rendered and expenses incurred by JSLF in connection with this litigation. I have personal knowledge of the facts stated herein and, if called as a witness, I would and could testify competently to them.

2. EPP Co-Lead Counsel sent all Class Counsel, including SLF, time and expense reporting protocol after being appointed by the Court on April 2, 2015. Throughout this litigation, JSLF has abided by this protocol as we have performed work, incurred expenses, and submitted monthly reports of our time and expenses. My firm's submission of its compensable time and reimbursable expenses in this Declaration and its exhibits comports with this time and expense reporting protocol.

During the period from April 2, 2015, through August 24, 2022, and at the direction of EPP Co-Lead Counsel, JSLF researched the facts giving rise to the claims in this litigation and others factual and legal research in connection with our pre-filing investigation and reviewed, analyzed and coded documents produced by Defendants.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the partners, attorneys and other professional support staff of my firm in this litigation. The lodestar calculation is based on my firm's historic hourly billing rates, except for work done on first-tier document review, which was capped at \$350 per hour, from April 2, 2015, through August 24, 2022.

4. The total number of hours expended on this litigation by my firm from April 2, 2015, through August 24, 2022, is 1,753.2 hours. The total lodestar for my firm is \$616,212.00. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. The total hours were determined by the examination of contemporaneous, daily time records regularly prepared and maintained by my firm, and which have been provided to EPP Co-Lead Counsel for their review.

5. As detailed in Exhibit 2, my firm has incurred a total of \$42,434.10 in unreimbursed expenses during the period from April 2, 2015, through August 24, 2022.

6. The unreimbursed expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 5th day of October, 2022 at San Francisco, California.

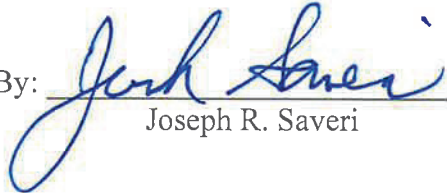
By: 
Joseph R. Saveri

EXHIBIT 1

**OPANA ER
TIME REPORT**

**Firm Name: Joseph Saveri Law Firm
Reporting Period: April 2, 2015 - August 31, 2022**

- (1) Investigations
- (2) Discovery
- (3) Pleadings, Briefs
- (4) Court Appearances & Preparation
- (5) Settlement
- (6) Class Certification
- (7) Trial & Preparation
- (8) Case Management & Litigation Strategy

Name	Status	1	2	3	4	5	6	7	8	Current Hourly Rate	Total Hours This Period	Lodestar This Period	Cumulative Hours	Cumulative Lodestar
Elissa Buchannan	A		1,736.9							\$350.00	1,736.9	\$607,915.00	1,736.9	\$607,915.00
Ryan J. McEwan	A		7.3							\$490.00	7.3	\$3,577.00	7.3	\$3,577.00
Ryan J. McEwan	A		4.6							\$500.00	4.6	\$2,300.00	4.6	\$2,300.00
Ryan J. McEwan	A		4.4							\$550.00	4.4	\$2,420.00	4.4	\$2,420.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
TOTALS		0.0	1,753.2	0.0	0.0	0.0	0.0	0.0	0.0		1,753.2	\$616,212.00	1,753.2	\$616,212.00

Partner (P)
Of Counsel (OC)
Associate (A)
Paralegal (PL)

EXHIBIT 2

**OPANA ER
EXPENSE REPORT**

Firm Name: Joseph Saveri Law Firm

Reporting Period: April 2, 2015 - August 31, 2022

Disbursement	Current Amount	Cumulative Amount
Electronic Research	\$2,433.60	\$2,433.60
Filing / Misc. Fees	\$0.00	\$0.00
Litigation Fund Contribution	\$40,000.00	\$40,000.00
Overnight Delivery/Messengers	\$0.00	\$0.00
Photocopying	\$0.50	\$0.50
Postage	\$0.00	\$0.00
Service of Process Fees	\$0.00	\$0.00
Telephone / Fax	\$0.00	\$0.00
Transportation / Meals / Lodging	\$0.00	\$0.00
Co-Counsel Fees	\$0.00	\$0.00
Expert Fees	\$0.00	\$0.00
Secretarial OT / Word Processing	\$0.00	\$0.00
Court Reporter Service/Transcript Fees	\$0.00	\$0.00
Microfilm / Video / Disks Duplication	\$0.00	\$0.00
TOTAL	\$42,434.10	\$42,434.10

EXHIBIT K

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE OPANA ER ANTITRUST LITIGATION	MDL No. 2580
THIS DOCUMENT RELATES TO: All End-Payor Actions	Lead Case No. 14-cv-10150 Hon. Harry D. Leinenweber

**DECLARATION OF MURIELLE J. STEVEN WALSH IN SUPPORT OF END-PAYOR
PLAINTIFFS’ MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND EXPENSES
ON BEHALF OF POMERANTZ LLP**

I, Murielle J. Steven Walsh, declare and state as follows:

1. I am a partner at the law firm Pomerantz LLP. I submit this Declaration in support of End Payor Plaintiffs’ (“EPP”) motion for an award of attorneys’ fees and reimbursement of costs and expenses in connection with services rendered and expenses incurred by my firm in connection with this litigation.

2. EPP Co-Lead Counsel sent all Class Counsel, including my firm, time and expense reporting protocol after being appointed by the Court on April 2, 2015. Throughout this litigation, my firm has abided by this protocol as we have performed work, incurred expenses, and submitted monthly reports of our time and expenses. My firm’s submission of its compensable time and reimbursable expenses in this Declaration and its exhibits comports with this time and expense reporting protocol.

3. During the period from April 2, 2015, through August 24, 2022, and at the direction of EPP Co-Lead Counsel, my firm has performed the following tasks on behalf of the EPPs: i)

engaged in client communications regarding the litigation; ii) participated in meet and confer meetings and other conference calls regarding discovery issues; iii) reviewed relevant documents and drafted memorandum regarding review findings; and iv) drafted memoranda in response to motion to dismiss and researched the legal issues regarding same.

4. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the partners, attorneys and other professional support staff of my firm in this litigation. The lodestar calculation is based on my firm's historic hourly billing rates, except for work done on first-tier document review, which was capped at \$350 per hour, from April 2, 2015, through August 24, 2022.

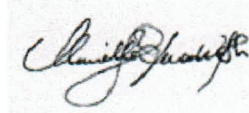
5. The total number of hours expended on this litigation by my firm from April 2, 2015, through August 24, 2022, is 787.70 hours. The total lodestar for my firm is \$328,619.50. The total hours were determined based on contemporaneous, daily time records regularly prepared and maintained by my firm, and which have been provided to EPP Co-Lead Counsel for their review.

6. As detailed in Exhibit 2, my firm has incurred a total of \$20,356.45 in unreimbursed expenses during the period from April 2, 2015, through August 24, 2022.

7. The unreimbursed expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 10th day of October, 2022 at Rumson, New Jersey.



Murielle J. Steven Walsh
Pomerantz LLP
600 Third Avenue, Floor 20
New York, NY 10016
Phone: 212-661-1100
Fax: 917-463-1044
Email: mjsteven@pomlaw.com

Exhibit 1

10/10/2022

Pomerantz LLP
Hours and Amount by Historical Rate
From 4/2/2015 to 8/24/2022

Page 1 of 1

Opana

ATTORNEY	STATUS	HISTORICAL RATE	HOURS	HISTORICAL TOTAL
Neu-Stoppelman, Mary E.	Project Associate	\$350.00	316.80	\$110,880.00
Goldstein, Jayne	Partner	\$820.00	61.20	\$50,184.00
Goldstein, Jayne	Partner	\$805.00	53.10	\$42,745.50
Gattegno, Perry	Associate	\$350.00	356.60	\$124,810.00
ATTORNEY TOTAL			787.7	\$328,619.50
FIRM'S TOTAL			787.7	\$328,619.50

Exhibit 2

10/10/2022

Detailed Matter Cost Report

Page 1 of 1

Matter: 3392-0001 - Opana
From 4/2/2015 to 8/24/2022**Cost Detail**

Date	Comment	Amount	BillNo
Computer Research			
04/02/2015	BNA: March 2015 research charges (Invoice #50960077)	\$5.77	<i>UnBilled</i>
04/06/2015	Pacer Service Center: Research charges incurred during period January 2015 through March 2015 (Invoice #2613808-Q12015)	\$8.10	<i>UnBilled</i>
05/01/2015	Westlaw Inv#831745498 Acct#1000812592	\$134.04	<i>UnBilled</i>
06/01/2015	West Group: May 2015 research charges (Invoice #831926432)	\$52.87	<i>UnBilled</i>
08/01/2015	West Group: July 2015 research charges (Invoice #832286472)	\$152.95	<i>UnBilled</i>
08/04/2015	BNA: July 2015 research charges (Invoice #50985515)	\$2.72	<i>UnBilled</i>
	Computer Research Total:	\$356.45	
Litigation Fund			
03/16/2016	Labaton Sucharow LLP: Opana Lit Fund	\$20,000.00	<i>UnBilled</i>
	Litigation Fund Total:	\$20,000.00	
	Disbursement Totals:	\$20,356.45	

EXHIBIT L

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE OPANA ER ANTITRUST LITIGATION	MDL No. 2580
THIS DOCUMENT RELATES TO: All End-Payor Actions	Lead Case No. 14-cv-10150 Hon. Harry D. Leinenweber

**DECLARATION OF JAYNE A. GOLDSTEIN IN SUPPORT OF END-PAYOR
PLAINTIFFS’ MOTION FOR AN AWARD OF ATTORENYS’ FEES AND EXPENSES
ON BEHALF OF MILLER SHAH LLP (FORMERLY SHEPHERD FINKELMAN
MILLER & SHAH, LLP)**

I, Jayne A. Goldstein, declare and state as follows:

1. I am a partner at the law firm Miller Shah LLP¹ (formerly Shepherd Finkelman Miller & Shah, LLP). I submit this Declaration in support of End Payor Plaintiffs’ (“EPP”) motion for an award of attorneys’ fees and reimbursement of costs and expenses in connection with services rendered and expenses incurred by my firm in connection with this litigation.

2. EPP Co-Lead Counsel sent all Class Counsel, including my firm, time and expense reporting protocol after being appointed by the Court on April 2, 2015. Throughout this litigation, my firm has abided by this protocol as we have performed work, incurred expenses, and submitted monthly reports of our time and expenses. My firm’s submission of its compensable time and

¹ I was a partner at Pomerantz LLP from April 4, 2013 through December 31, 2016. I understand that they filed a declaration in this matter that includes my time while at Pomerantz. I became a partner at Miller & Shah (formerly known as Shepherd Finkelman Miller & Shah) from January 1, 2017 until the present. This declaration only includes my time while at Miller & Shah.

reimbursable expenses in this Declaration and its exhibits comports with this time and expense reporting protocol.

3. During the period from April 2, 2015, through August 24, 2022, and at the direction of EPP Co-Lead Counsel, my firm has been involved in the following activities on behalf of the EPPs:

- Identified, collected, reviewed, and produced documents from class representative Fraternal Order of Police Miami Lodge 20 Insurance Trust Fund;
- Reviewed, analyzed and coded documents produced by Defendants;
- Participated in strategy and assisted with various teams and experts;
- Assisted EPP Co-Lead Counsel with preparation for defending class representative Fraternal Order of Police Miami Lodge 20 Insurance Trust Fund at deposition;

4. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the partners, attorneys and other professional support staff of my firm in this litigation. The lodestar calculation is based on my firm's historic hourly billing rates, except for work done on first-tier document review, which was capped at \$350 per hour, from April 2, 2015, through August 24, 2022.

5. The total number of hours expended on this litigation by my firm from April 2, 2015 through August 24, 2022 is 989.40 hours. The total lodestar for my firm is \$480,080. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. The total hours were determined by the examination of contemporaneous, daily time records regularly prepared and maintained by my firm, and which have been provided to EPP Co-Lead Counsel for their review.

6. As detailed in Exhibit 2, my firm has incurred a total of \$54,974.39 in unreimbursed expenses during the period from April 2, 2015 through August 24, 2022.

7. The unreimbursed expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 8th day of October, 2022 at Delray Beach, FL.

/s/Jayne A. Goldstein
Jayne A. Goldstein

EXHIBIT 1

**OPANA ER
TIME REPORT**

Firm Name: Miller Shah

Reporting Period: April 2, 2015 - August 24, 2022

- (1) Investigations
- (2) Discovery
- (3) Pleadings, Briefs
- (4) Court Appearances & Preparation
- (5) Settlement
- (6) Class Certification
- (7) Trial & Preparation
- (8) Case Management & Litigation Strategy

Name	Status	1	2	3	4	5	6	7	8	Current Hourly Rate	Total Hours This Period	Lodestar This Period	Cumulative Hours	Cumulative Lodestar
sjohnson	OC									\$350.00	534.0	\$186,900.00	534.0	\$186,900.00
mhe	OC									\$350.00	159.0	\$55,650.00	159.0	\$55,650.00
Jayne Goldstein	P									\$775.00	62.6	\$48,515.00	62.6	\$48,515.00
Jayne Goldstein	P									\$825.00	174.0	\$143,550.00	174.0	\$143,550.00
Jayne Goldstein	P									\$850.00	34.4	\$29,240.00	34.4	\$29,240.00
Jayne Goldstein	P									\$925.00	5.6	\$5,180.00	5.6	\$5,180.00
mols	A									\$325.00	12.2	\$3,965.00	12.2	\$3,965.00
Jayne Goldstein	P									\$950.00	7.6	\$7,220.00	7.6	\$7,220.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
TOTALS		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0		989.4	\$480,220.00	989.4	\$480,220.00

Partner (P)
Of Counsel (OC)
Associate (A)
Paralegal (PL)

EXHIBIT 2

Opana ER Expenses - 8/2/15-8/24/22

Expense	Case Fund Contribution	edibattista	7/1/2016	0	N/A	\$20,000.00
Expense	Computer Research/Access	edibattista	7/27/2016	0	N/A	\$44.50
Expense	Computer Research/Access	edibattista	8/6/2016	0	N/A	\$33.89
Expense	Internal Copying	edibattista	1/31/2017	0	N/A	\$25.00
Expense	Travel and Related Expenses	edibattista	6/5/2017	0	N/A	\$222.15
Expense	Experts/Investigators	edibattista	10/13/2017	0	N/A	\$839.27
Expense	Travel and Related Expenses	edibattista	8/6/2018	0	N/A	\$45.90
Expense	Lunch for deposition at Florida office	edibattista	8/7/2018	0	N/A	\$60.00
Expense	Internal Copying	edibattista	8/31/2018	0	N/A	\$33.25
Expense	Travel and Related Expenses	edibattista	10/11/2018	0	N/A	\$1,009.06
Expense	Travel and Related Expenses	edibattista	11/5/2018	0	N/A	\$524.14
Expense	Travel and Related Expenses	edibattista	11/27/2018	0	N/A	\$1,976.96
Expense	Internet/Telephone	edibattista	11/27/2018	0	N/A	\$8.00
Expense	Computer Research/Access	edibattista	3/31/2019	0	N/A	\$136.27
Expense	Computer Research/Access	edibattista	3/31/2019	0	N/A	\$16.00
Expense	Case Fund Contribution	edibattista	4/15/2020	0	N/A	\$20,000.00
Expense	Case Fund Contribution	edibattista	6/15/2022	0	N/A	\$10,000.00
						\$54,974.39

EXHIBIT M

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE OPANA ER ANTITRUST
LITIGATION

MDL No. 2580

Lead Case No. 14-cv-10150

THIS DOCUMENT RELATES TO:

Hon. Harry D. Leinenweber

All End-Payor Actions

**DECLARATION OF MICHAEL LESSER IN SUPPORT OF END-PAYOR
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES
ON BEHALF OF THORNTON LAW FIRM**

I, Michael Lesser, declare and state as follows:

1. I am a partner at the Thornton Law Firm. I submit this Declaration in support of End Payor Plaintiffs' ("EPP") motion for an award of attorneys' fees and reimbursement of costs and expenses in connection with services rendered and expenses incurred by Thornton Law Firm in connection with this litigation.

2. Thornton Law Firm's work in this matter was overseen by a firm partner (and practice group) who is no longer a member of Thornton Law Firm and who is now of counsel to Labaton Sucharow. No present members of the firm had a role in or worked on this matter. To submit this Declaration, I have discussed the contents of this Declaration with the former partner responsible for this matter, and these sworn representations are based in part on those communications.

3. Based on my discussions with our former partner responsible for this matter, Thornton Law Firm participated in discovery by paying for two document review attorneys to

analyze and code documents produced by Defendants and third parties. Because document review is a collaborative and iterative process, Co-Lead Counsel Labaton Sucharow offered Thornton Law Firm (and others) the opportunity to use document review attorneys employed by Labaton Sucharow to work together with other case document reviewers at the office of Labaton Sucharow in New York. As a result, at no time were the two document review attorneys employees of Thornton Law Firm, present at the offices of Thornton Law Firm, and no present member of the firm had any interaction with them. A document review team working in shared office space created efficiencies and allowed for the direct exchange of information, ideas, and strategies among the review team, which benefitted the Classes. The two document review attorneys' hourly rates were initially paid by Labaton Sucharow, which Labaton Sucharow then recouped by invoicing Thornton Law Firm for these services. Thornton Law Firm did not directly pay the two document review attorneys. As a result, Thornton Law Firm ultimately bore the cost of the two document review attorneys (Labaton Sucharow was fully reimbursed), and that unreimbursed lodestar time appears on Exhibit 1 to this Declaration. Labaton Sucharow is not seeking reimbursement of the cost of these document review attorneys, and these document review attorneys' lodestars do not appear on Exhibit 1 to Labaton Sucharow's Declaration.

4. Based on my discussions with our former partner responsible for this matter, EPP Co-Lead Counsel sent all Class Counsel, including Thornton Law Firm, a time and expense reporting protocol after being appointed by the Court on April 2, 2015. Based on my discussions with our former partner responsible for this matter, throughout this litigation, Thornton Law Firm has abided by this protocol. Based on my discussions with our former partner responsible for this matter, Thornton Law Firm's submission of document review attorney compensable time and

reimbursable expenses in this Declaration and its exhibits comports with this time and expense reporting protocol.

5. During the period from August 22, 2016, through August 31, 2018, and at the direction of EPP Co-Lead Counsel, the document review attorneys whose hourly rates were ultimately paid by Thornton Law Firm (whose hourly rates were otherwise reimbursed by Thornton Law Firm to Labaton Sucharow) were involved in the following activities on behalf of the EPPs:

- Ayoola Badejo: Reviewed, analyzed and coded documents, including spreadsheets, presentations, and e-mails produced by Defendants and performed targeted searches for specific documents by subject matter;
- Marie Mukete: Reviewed, analyzed and coded documents, including spreadsheets, presentations, and e-mails produced by Defendants and performed targeted searches for specific documents by subject matter; assisted supervising attorneys with preparation for deposition, including review of documents relevant to deposition preparation;

6. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by Ayoola Badejo and Marie Mukete in this litigation. The lodestar calculation is based on a billing rate of \$350 an hour, believed to be reasonable for work done on first-tier document review, and the same as the billing rate applicable to all document review attorneys in this matter.

7. The total number of hours expended on this litigation by Ayoola Badejo and Marie Mukete from April 2, 2015, through August 24, 2022, is 3277.6 hours. The total lodestar for the work of Ayoola Badejo and Marie Mukete is \$1,147,160.00. The hourly rate for these document review attorneys is believed to be reasonable for document review and related work in contingent billable matters. The total hours were determined by the examination of contemporaneous, daily

time records regularly prepared and maintained by Labaton Sucharow and our former partner, and which have been provided to EPP Co-Lead Counsel for their review.

8. As detailed in Exhibit 2, Thornton Law Firm has incurred a total of \$70,358.65 in unreimbursed expenses during the period from April 2, 2015, through August 24, 2022.

9. The unreimbursed expenses incurred in this action are reflected on the books and records of Thornton Law Firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 10th day of October 2022 at Boston, Massachusetts.



Michael Lesser
BBO# 631128
Thornton Law Firm, LLP
One Lincoln Street, Suite 1300
Boston, MA 02111
617-720-1333
mlesser@tenlaw.com

EXHIBIT 1

**OPANA ER
TIME REPORT**

Firm Name: Thornton Law Firm

Reporting Period: April 2, 2015 - August 31, 2022

- (1) Investigations
- (2) Discovery
- (3) Pleadings, Briefs
- (4) Court Appearances & Preparation
- (5) Settlement
- (6) Class Certification
- (7) Trial & Preparation
- (8) Case Management & Litigation Strategy

Name	Status	1	2	3	4	5	6	7	8	Hourly Rate	Total Hours This Period	Lodestar This Period	Cumulative Hours	Cumulative Lodestar
Ayoola Badejo	DRA		2,050.1							\$350.00	2,050.1	\$717,535.00	2,050.1	\$717,535.00
Marie Mukete	DRA		1,227.5							\$350.00	1,227.5	\$429,625.00	1,227.5	\$429,625.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
TOTALS		0.0	3,277.6	0.0	0.0	0.0	0.0	0.0	0.0		3,277.6	\$1,147,160.00	3,277.6	\$1,147,160.00

Partner (P)
Of Counsel (OC)
Associate (A)
Document Review Attorney (DRA)
Paralegal (PL)

EXHIBIT 2

**OPANA ER
EXPENSE REPORT**

Firm Name: Thornton Law Firm

Reporting Period: April 2, 2015 - August 31, 2022

Disbursement	Current Amount	Cumulative Amount
Electronic Research	\$0.00	\$0.00
Filing / Misc. Fees		
Litigation Fund Contribution	\$70,000.00	\$70,000.00
Overnight Delivery/Messengers	\$0.00	\$0.00
Photocopying / Medical Record and Delivery	\$358.65	\$358.65
Postage	\$0.00	\$0.00
Service of Process Fees	\$0.00	\$0.00
Telephone / Fax	\$0.00	\$0.00
Transportation / Meals / Lodging	\$0.00	\$0.00
Co-Counsel Fees	\$0.00	\$0.00
Expert Fees	\$0.00	\$0.00
Secretarial OT / Word Processing	\$0.00	\$0.00
Court Reporter Service/Transcript Fees	\$0.00	\$0.00
Microfilm / Video / Disks Duplication	\$0.00	\$0.00
	\$0.00	\$0.00
TOTAL	\$70,358.65	\$70,358.65

EXHIBIT N

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE OPANA ER ANTITRUST
LITIGATION

MDL No. 2580

Lead Case No. 14-cv-10150

THIS DOCUMENT RELATES TO:

Hon. Harry D. Leinenweber

End-Payor Actions

**DECLARATION OF JUSTIN N. BOLEY OF WEXLER BOLEY & ELGERSMA LLP
IN SUPPORT OF END PAYOR PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, EXPENSES, AND SERVICE AWARDS**

I, Justin N. Boley, hereby declare as follows:

1. I am a Partner at Wexler Boley & Elgersma LLP (“WBE”), admitted to practice before this Court, and filed an appearance in this matter. I submit this declaration in support of End Payor Plaintiffs’ motion for attorneys’ fees, expenses, and service awards.

I. FIRM BACKGROUND

2. WBE is a national leader in complex commercial litigation, including private antitrust litigation, unfair competition, Medicare and Medicaid fraud, *qui tam* actions, and consumer protection. Our firm has brought a wide variety of class action cases in state and federal courts to address corporate misconduct in the pharmaceutical, entertainment, service rental, transportation, manufacturing, lumber, energy, electronics, and finance industries. Since its founding, the firm has recovered over a billion dollars for its clients and consumers.

II. OVERVIEW OF WORK PERFORMED BY WBE

A. Work Performed in Connection with the Litigation

3. WBE worked on almost every aspect of preparing this case for trial, and played a substantial role at trial, helping Co-Lead Counsel in prosecuting a novel and significant theory before this Court and eventually reaching a favorable settlement with Impax for our clients. Our firm’s involvement included writing pretrial motions, crafting trial strategy with Co-Lead Counsel, preparing witnesses for examination at trial, attorney and support staff attendance at trial to provide contemporaneous assistance, negotiating with Impax to reach a favorable settlement, reviewing and synthesizing daily trial transcripts for relevant testimony for use in witness preparation and closing statements, and coordinating Plaintiffs’ opposition to Defendant’s Fed. R. Civ. Pro. Rule 50 motion.

B. Lodestar Summary

4. In performing the work above, WBE attorneys and staff expended 2,398.6 hours for a total lodestar of \$ 1,157,249.50.

5. In accordance with the Court’s and Co-Lead Counsel’s direction concerning time and expense reporting, the firm’s attorneys and staff kept contemporaneous records of the time they spent on this litigation. In reporting their time, WBE exercised billing judgment to eliminate inefficiency and duplication, and then submitted its daily time records to Co-Lead Counsel for review and audit. Consistent with direction from Co-Lead Counsel and to further streamline the settlement process, WBE has omitted approximately 21.9 hours from the fee petition from one Partner, one Associate, and two Paralegals. WBE’s hourly rates are similar to rates for which fees were sought and approved by courts in other complex class cases. WBE is prepared to submit its time records for *in camera* review if requested by the Court.

6. Below is a summary of the individuals who worked on this matter from WBE, their roles (Partner, Associate, Paralegal, Litigation Staff), the total number of hours they worked, their historic hourly billing rates, and their total lodestar. Later in this declaration we detail the specific work performed by each individual.

Timekeeper	Role	Historical Rates	Hours	Lodestar
Justin N. Boley	Partner	\$450	.6	\$270.00
		\$475	24.6	\$11,685.00
		\$675	13	\$8,775.00
		\$750	9.7	\$7,275.00
		\$770	.5	\$385.00

Timekeeper	Role	Historical Rates	Hours	Lodestar
		\$800	8.4	\$6,720.00
		\$850	363.1	\$308,635.00
TOTAL			419.9	\$343,745.00
Bethany R. Turke	Partner	\$500	.9	\$450.00
		\$550	10.9	\$5,995.00
		\$675	.3	\$202.50
TOTAL			12.1	\$6,647.50
Tyler J. Story	Associate	\$350	22.8	\$7,980.00
		\$575	.4	\$230.00
		\$625	258.4	\$161,500.00
TOTAL			281.6	\$169,710.00
Eaghan S. Davis	Associate	\$525	257	\$134,925.00
TOTAL			257	\$134,925.00
Zoran Tasić	Associate	\$550	29	\$15,950.00
TOTAL			29	\$15,950.00
Adam Prom	Associate	\$340	14.4	\$4,896.00
TOTAL			14.4	\$4,896.00
Tara Williams	Contract Associate	\$350	1,191	\$416,850.00
TOTAL			1,191	\$416,850.00
Ashtin Otto	Paralegal	\$250	3.4	\$850.00

Timekeeper	Role	Historical Rates	Hours	Lodestar
		\$275	.1	\$27.50
		\$300	1.0	\$300.00
		\$335	189.1	\$63,348.50
TOTAL			193.6	\$64,526.00
GRAND TOTAL			2,398.6	\$1,157,249.50

C. Staffing and Tasks Performed in This Matter

7. WBE staffed this matter with attorneys and staff who performed tasks based on their skills, experience, and expertise, and which were responsive to the needs of the case.

8. I supervised and managed the workload of attorneys Tyler J. Story and Eaghan S. Davis in the case; reviewed and edited pretrial motions, consulted with co-counsel about evidentiary objections, strategized with co-counsel regarding opening and closing statements, and witness preparation and examination, attended trial to contemporaneously strategize with co-counsel about witness examination and evidentiary objections, and helped Co-Lead Counsel negotiate with Impax to reach favorable settlement.

9. Bethany R. Turke, Associate (now Partner), participated in the End-Payor Plaintiffs' discovery efforts in this case and supervised and managed the workload of Tara Williams on discovery matters.

10. Tyler J. Story, Senior Associate, worked on several substantive aspects of the case, which included drafting pretrial and trial motions, strategizing with Co-Lead Counsel regarding evidentiary issues related to antitrust injury and damages, assisting Co-Lead Counsel in preparing the End-Payor Plaintiffs' expert economist for trial testimony, reviewing and

editing trial demonstratives, reviewing and synthesizing daily trial transcripts for testimony relevant to the legal elements of Plaintiffs' antitrust claims, and assisting co-counsel in preparing to oppose Endo's Rule 50 motion.

11. Eaghan S. Davis, Associate, assisted in researching and drafting pretrial motions, assisted in researching evidentiary admission issues, attended trial to track exhibits for use in briefing, reviewed and synthesized daily trial transcripts for testimony relevant to the legal elements of Plaintiffs' antitrust claims, assisted co-counsel in preparing for Plaintiffs' opposition to Endo's Rule 50 motion by answering inquiries about relevant testimony, assisted co-counsel in preparing for closing argument by answering inquiries about relevant testimony.

12. Zoran Tasić, Senior Associate, assisted in drafting several pretrial motions *in limine* and opposing Defendants' motions *in limine*.

13. Adam Prom, Associate, who has since left the firm's employ, assisted in researching legal claims for inclusion in the amended consolidated complaint and drafting sections of said complaint.

14. Tara Williams, Document Reviewer, assisted in pretrial discovery and document review, wrote weekly memoranda summarizing her review, and participated in weekly progress meetings with co-counsel's reviewers.

III. EXPENSES INCURRED IN THE PROSECUTION OF THE LITIGATION

15. In connection with its efforts in this matter, WBE incurred a variety of out-of-pocket expenses. Below is an itemized list of the unreimbursed expenses the firm incurred during the prosecution of this litigation. Those expenses are reflected in the firm's books and records that are regularly maintained in the ordinary course of the firm's business and are based on the receipts and data maintained by the firm.

Expense Category	Amount
Electronic Research	\$2,842.22
Filing/Misc. Fees	
Litigation Fund Contribution	\$90,000.00
Overnight Delivery/Messengers	
Photocopying	\$1.60
Postage	
Service of Process Fees	
Telephone/Fax	\$31.98
Transportation/Meals/Lodging/Airfare	\$20,861.15
Co-Counsel Fees	
Expert Fees	
Secretarial OT/Word Processing	
Court Reporter Service/Transcript Fees	\$3,669.23
Microfilm/Video/Disks Duplication	
Other	\$462.36
TOTAL	\$117,868.54

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 11, 2022 in Chicago, Illinois.

/s/ Justin N. Boley

EXHIBIT O

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE OPANA ER ANTITRUST LITIGATION	MDL No. 2580 Lead Case No. 14-cv-10150
THIS DOCUMENT RELATES TO: All End-Payor Actions	Hon. Harry D. Leinenweber

**DECLARATION OF ROBERT KITCHENOFF IN SUPPORT OF END-PAYOR
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
EXPENSES ON BEHALF OF WEINSTEIN KITCHENOFF & ASHER LLC**

I, Robert Kitchenoff, declare and state as follows:

1. I am a partner at the law firm Weinstein Kitchenoff & Asher LLC. I submit this Declaration in support of End Payor Plaintiffs' ("EPP") motion for an award of attorneys' fees and reimbursement of costs and expenses in connection with services rendered and expenses incurred by my firm in connection with this litigation.

2. EPP Co-Lead Counsel sent all Class Counsel, including my firm, time and expense reporting protocol after being appointed by the Court on April 2, 2015. Throughout this litigation, my firm has abided by this protocol as we have performed work, incurred expenses, and submitted monthly reports of our time and expenses. My firm's submission of its compensable time and reimbursable expenses in this Declaration and its exhibits comports with this time and expense reporting protocol.

3. During the period from April 2, 2015, through August 24, 2022, and at the direction of EPP Co-Lead Counsel, my firm reviewed, analyzed, and coded documents produced by Defendants.

4. My firm participated in discovery by using a document review attorney to analyze and code documents produced by Defendants and third-parties. Because document review is a collaborative and iterative process, Co-Lead Counsel Labaton Sucharow offered our firm (and others) the opportunity to use a document review attorney employed by Labaton Sucharow to work together with other case document reviewers at the office of Labaton Sucharow in New York. The document review team working in shared office space created efficiencies and allowed for the direct exchange of information, ideas and strategies among the review team, which benefitted the Classes. The document review attorney's hourly rate was initially paid by Labaton Sucharow, which Labaton Sucharow then recouped by invoicing my firm for these services. Thus, my firm ultimately paid for the document review attorney (Labaton Sucharow was fully reimbursed), and that unreimbursed lodestar time appears on Exhibit 1 to this Declaration. Labaton Sucharow is not seeking reimbursement of the cost of this document review attorney, and this document review attorney's lodestar does not appear on Exhibit 1 to Labaton Sucharow's Declaration.

5. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the partners, attorneys and other professional support staff of my firm in this litigation. The lodestar calculation is based on my firm's historic hourly billing rates, except for work done on first-tier document review, which was capped at \$350 per hour, from April 2, 2015, through August 24, 2022.

6. The total number of hours expended on this litigation by my firm from April 2, 2015, through August 24, 2022, is 1,704.00 hours. The total lodestar for my firm is \$596,400.00

The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. The total hours of the document review attorney were determined by the examination of contemporaneous, daily time records regularly prepared and maintained by Labaton Sucharow, which have been provided to EPP Co-lead Counsel for their review.”

7. As detailed in Exhibit 2, my firm has incurred a total of \$70,000.00 in unreimbursed expenses during the period from April 2, 2015, through August 24, 2022.

8. The unreimbursed expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 10th day of October, 2022 at Bala Cynwyd, Pennsylvania.

A handwritten signature in blue ink that reads "Robert S. Kitchenoff". The signature is written in a cursive style with a horizontal line extending from the end of the name.

Robert Kitchenoff

EXHIBIT 1

**OPANA ER
TIME REPORT**

**Firm Name: Weinstein Kitchenoff & Asher LLC
Reporting Period: April 2, 2015 - August 31, 2022**

- (1) Investigations
- (2) Discovery
- (3) Pleadings, Briefs
- (4) Court Appearances & Preparation
- (5) Settlement
- (6) Class Certification
- (7) Trial & Preparation
- (8) Case Management & Litigation Strategy

Name	Status	1	2	3	4	5	6	7	8	Current Hourly Rate	Total Hours This Period	Lodestar This Period	Cumulative Hours	Cumulative Lodestar
Migiwa Hayashi	DRA		1,704.0							\$350.00	1,704.0	\$596,400.00	1,704.0	\$596,400.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
											0.0	\$0.00	0.0	\$0.00
TOTALS		0.0	1,704.0	0.0	0.0	0.0	0.0	0.0	0.0		1,704.0	\$596,400.00	1,704.0	\$596,400.00

Partner (P)
Of Counsel (OC)
Associate (A)
Paralegal (PL)

EXHIBIT 2

**OPANA ER
EXPENSE REPORT**

Firm Name: Weinstein Kitchenoff & Asher LLC
Reporting Period: April 2, 2015 - August 31, 2022

Disbursement	Current Amount	Cumulative Amount
Electronic Research	\$0.00	
Filing / Misc. Fees	\$0.00	
Litigation Fund Contribution	\$0.00	\$70,000.00
Overnight Delivery/Messengers	\$0.00	
Photocopying	\$0.00	
Postage	\$0.00	
Service of Process Fees	\$0.00	
Telephone / Fax	\$0.00	
Transportation / Meals / Lodging	\$0.00	
Co-Counsel Fees	\$0.00	
Expert Fees	\$0.00	
Secretarial OT / Word Processing	\$0.00	
Court Reporter Service/Transcript Fees	\$0.00	
Microfilm / Video / Disks Duplication	\$0.00	
TOTAL	\$0.00	\$70,000.00

EXHIBIT P

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE OPANA ER ANTITRUST
LITIGATION

MDL No. 2580

Lead Case No. 14-cv-10150

THIS DOCUMENT RELATES TO:

Hon. Harry D. Leinenweber

All End-Payor Actions

**DECLARATION OF JOHN A. MACORETTA IN SUPPORT OF END-PAYOR
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES
ON BEHALF OF SPECTOR ROSEMAN & KODROFF, P.C.**

I, John A. Macoretta, declare and state as follows:

1. I am a partner at the law firm Spector Roseman & Kodroff, P.C. I submit this Declaration in support of End Payor Plaintiffs' ("EPP") motion for an award of attorneys' fees and reimbursement of costs and expenses in connection with services rendered and expenses incurred by my firm in connection with this litigation.

2. EPP Co-Lead Counsel sent all Class Counsel, including my firm, time and expense reporting protocol after being appointed by the Court on April 2, 2015. Throughout this litigation, my firm has abided by this protocol as we have performed work, incurred expenses, and submitted monthly reports of our time and expenses. My firm's submission of its compensable time and reimbursable expenses in this Declaration and its exhibits comports with this time and expense reporting protocol.

3. During the period from April 2, 2015, through August 24, 2022, and at the direction of EPP Co-Lead Counsel, my firm has been involved in the following activities on behalf of the EPPs:

- Identified, collected, reviewed, and produced documents from class representative Pa. Employee Benefits Trust Fund (“PEBTF”);
- Assisted EPP Co-Lead Counsel with preparation for defending class representative Kate Farley of PEBTF at deposition; and
- Reviewed and designated deposition testimony and documents from PEBTF in preparation for trial.

4. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the partners, attorneys and other professional support staff of my firm in this litigation. The lodestar calculation is based on my firm’s historic hourly billing rates, except for work done on first-tier document review, which was capped at \$350 per hour, from April 2, 2015, through August 24, 2022.

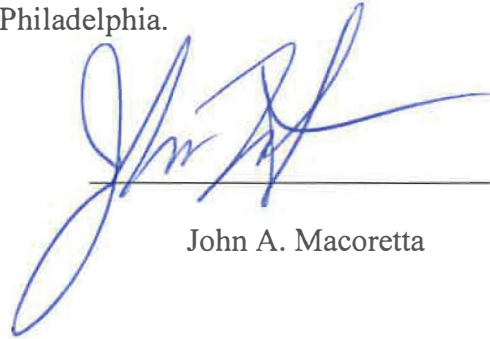
5. The total number of hours expended on this litigation by my firm from April 2, 2015, through August 24, 2022, is 170.9 hours. The total lodestar for my firm is \$89,536.50. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. The total hours were determined by the examination of contemporaneous, daily time records regularly prepared and maintained by my firm, and which have been provided to EPP Co-Lead Counsel for their review.

6. As detailed in Exhibit 2, my firm has incurred a total of \$26,402.60 in unreimbursed expenses during the period from April 2, 2015, through August 24, 2022.

7. The unreimbursed expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 6th day of October, 2022 at Philadelphia.



John A. Macoretta

EXHIBIT 1

**OPANA ER
TIME REPORT**

Firm Name:
Reporting Period: APRIL 2, 2015 THROUGH AUGUST 12, 2022

SPECTOR ROSEMAN & KODROFF, PC

- | | |
|-------------------------------------|---|
| (1) Investigations | (5) Settlement |
| (2) Discovery | (6) Class Certification |
| (3) Pleadings, Briefs | (7) Trial & Preparation |
| (4) Court Appearances & Preparation | (8) Case Management & Litigation Strategy |

Name	Status	1	2	3	4	5	6	7	8	Current Hourly Rate	Total Hours This Period	Lodestar This Period	Cumulative Hours	Cumulative Lodestar
J. Macoretta	P	0.3	1.2			0.9	0.6	10.4	7.6	\$975.00	21.0	\$17,076.50	21.00	\$17,076.50
D. Zinser	P	7.8	113.0			1.8	1.8	11.5	14.0	\$750.00	149.9	\$72,460.00	149.90	\$72,460.00
											0.0	\$0.00	0.00	\$0.00
TOTALS		8.1	114.2	0.0	0.0	2.7	2.4	21.9	21.6		170.9	\$89,536.50	170.90	89,536.50

Partner (P)
Of Counsel (OC)
Associate (A)
Paralegal (PL)

EXHIBIT 2

**OPANA ER
EXPENSE REPORT**

Firm Name: SPECTOR ROSEMAN & KODROFF, PC

Reporting Period: - APRIL 2, 2015 THROUGH AUUST 12, 2022

Disbursement	Current Amount	Cumulative Amount
Electronic Research	\$682.53	\$682.53
Filing / Misc. Fees	\$78.88	\$78.88
Litigation Fund Contribution	\$25,000.00	\$25,000.00
Overnight Delivery/Messengers	\$0.00	
Photocopying	\$225.75	\$225.75
Postage	\$0.00	
Service of Process Fees	\$0.00	\$0.00
Telephone / Fax	\$18.39	\$18.39
Transportation / Meals / Lodging	\$397.05	\$397.05
Co-Counsel Fees	\$0.00	\$0.00
Expert Fees	\$0.00	\$0.00
Secretarial OT / Word Processing	\$0.00	\$0.00
Court Reporter Service/Transcript Fees	\$0.00	\$0.00
Microfilm / Video / Disks Duplication	\$0.00	\$0.00
TOTAL	\$26,402.60	\$26,402.60