

EXHIBIT 12

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re: NEXIUM (ESOMEPRAZOLE)
ANTITRUST LITIGATION

MDL No. 2409

Civil Action No. 1:12-md-02409-WGY

This Document Relates To:

All Actions

**DECLARATION OF SMITH SEGURA & RAPHAEL, LLP
IN SUPPORT OF PLAINTIFFS' MOTION FOR REIMBURSEMENT OF EXPENSES
AND CREATION OF A FUND FOR FUTURE LITIGATION EXPENSES**

I, Susan C. Segura, declare as follows:

1. I am a partner at the law firm of Smith Segura & Raphael, LLP. I submit this Declaration in support of Plaintiffs' Motion for Reimbursement of Expenses in connection with services rendered in prosecuting this action through trial.

2. My firm has acted as counsel to the Direct Class Plaintiffs in this litigation.

During the course of this litigation, my firm has been involved in the following activities:

- Performed investigations and factual research regarding potential claims, drafted complaints for Burlington Drug Company, Inc. ("Burlington") and Value Drug Company ("Value") and regularly communicated with Burlington's and Value's representatives to keep them fully informed throughout this litigation;
- Handled all aspects of discovery directed to all Direct Purchaser Plaintiffs, including drafting responses to Defendants' various discovery requests, participating in meet and confer conferences with opposing counsel, managing and coordinating production of documents by Burlington and Value, preparing Burlington's and Value's 30(b)(6) representatives for deposition, and defending those depositions;
- Participated in document review, coding and evidence compilation concerning claims against Defendants;
- Drafted Oppositions and related pleadings in response to Defendants' multiple Motions for Summary Judgment;

- Participated in preparation for trial, including coordinating with all Plaintiffs (Direct Purchaser, End Payor, and Opt-Out Plaintiffs) for attending and testifying at trial, as well as preparing trial testimony outlines for all Direct Purchaser Plaintiffs;
- Assisted in coordination of daily trial team efforts (*via* paralegal member of trial team); assisted in drafting various evidentiary memoranda and briefs during trial (*via* attorney member of trial team).

3. The total number of hours expended by my firm from inception of the litigation through November 24, 2014, the date on which the settlement with Teva was agreed to in principal, is 6441.80 hours, which includes 4046.30 attorney hours and 2395.50 hours spent by paralegals.

4. This firm has incurred a total of \$187,655.67 in non-reimbursed expenses in connection with the prosecution of this litigation through the end of trial, including return travel from trial. These expenses are summarized as follows:

EXPENSE	AMOUNT
Litigation Fund Contribution(s)	\$120,000.00
Travel/Hotel/Meals	\$55,082.53
Copying Services	\$3,222.40
Research Services	\$5,597.05
Telephone/Teleconference/Fax	\$2,726.98
FedEx/Messengers/Postage	\$826.71
Court Fees	\$200.00
Other (describe)	
TOTAL	\$187,655.67

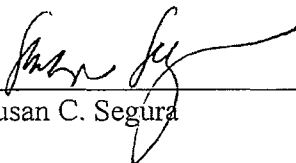
5. The expenses incurred in this action are reflected on my firm's books and records, which are maintained in the ordinary course of business and prepared from invoices, receipts,

credit card bills, cancelled checks and wire transfer notices, expense vouchers, check records, and other source materials, and they represent an accurate recordation of the expenses incurred.

6. This firm's practice emphasizes antitrust class actions and this firm has substantial experience in pharmaceutical antitrust class action cases. A firm biography and the biography of each attorney currently employed with the firm who has worked on this case is available upon request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

SMITH SEGURA & RAPHAEL, LLP



Susan C. Segura

Dated: August 26, 2015