

EXHIBIT 2

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 DAVID F. SORENSEN IN SUPPORT OF
PLAINTIFFS' MOTION FOR REIMBURSEMENT OF EXPENSES AND
CREATION OF A FUND FOR FUTURE LITIGATION EXPENSES**

I, David F. Sorensen, declare as follows:

1. I am a managing shareholder at the law firm of Berger & Montague, P.C. 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 Purchaser Class Plaintiffs in this litigation. During the course of this litigation, my firm has been involved in, *inter alia*, the following case-related activities:

- Reviewed and analyzed thousands of pages of documents and data produced by Defendants and participated in all aspects of discovery on economic matters;
- Participated in briefing and arguing oppositions to Defendants' motions to dismiss and Direct Purchaser Class Plaintiffs' motion for class certification; participated in briefing on Direct Purchaser Class Plaintiffs' opposition to Defendants' Rule 23(f) petition, and the oppositions to Defendants' motions for summary judgment;
- Deposed two defense experts, five fact witnesses, and two third parties;
- Worked with economic experts regarding the underlying theories of antitrust violation, class certification, economic impact, and assessment of damages; and
- At trial, preparing witness examinations, briefed and responded to motions in limine and trial briefs and motions, drafted jury instructions and oppositions to Defendants' motions for directed verdict.

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 14,765.70 hours, which includes 10,348.70 attorney hours, 33 consultant hours, and 4,384 hours spent by paralegals.

4. This firm has incurred a total of \$809,204.75 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:

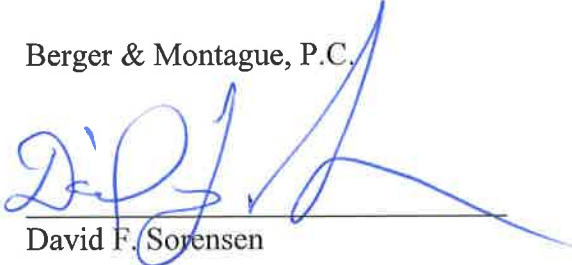
EXPENSE	AMOUNT
Litigation Fund Contribution(s)	\$525,000.00
Travel/Hotel/Meals	\$125,684.21
Copying Services	\$39,560.65
Research Services	\$70,005.43
Telephone/Teleconference/Fax	\$512.83
FedEx/Messengers/Postage/Process Server	\$913.63
Court Fees	\$1,102.00
Consulting Fees (IMS)	\$46,406.00
Petty Cash	\$20.00
TOTAL	\$809,204.75

6. 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 represent an accurate recordation of the expenses incurred.

7. 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 and on Berger & Montague, P.C.'s website. *See* <http://www.bergermontague.com>.

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.

Berger & Montague, P.C.

David F. Sorensen

Dated: September 9, 2015