

# **EXHIBIT 20**

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 STEVE D. SHADOWEN IN SUPPORT OF  
PLAINTIFFS' MOTION FOR REIMBURSEMENT OF EXPENSES AND  
CREATION OF A FUND FOR FUTURE LITIGATION EXPENSES**

I, Steve D. Shadowen, declare as follows:

1. I am a partner at the law firm of Hilliard & Shadowen 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 End-Payor Class Plaintiffs in this litigation.

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

- Investigation of facts leading to the drafting and filing of the first complaint;
- Legal research and briefing in connection with, *inter alia*, oppositions to Defendants' motions to dismiss; discovery disputes; oppositions to multiple summary judgment, daubert motions, and motions in limine;
- Discovery-related tasks, including, *inter alia*, document review, responding to discovery issued by Defendants, taking depositions, meeting and conferring with Defendants over the scope of Defendants' productions;
- Pre-trial preparation, including, *inter alia*, designating deposition testimony and trial exhibits; objecting to Defendants' proposed trial exhibits; and drafting cross-examination outlines;
- Co-trial counsel during six-week trial, including, *inter alia*, examining fact and expert witnesses at trial; preparing to examine fact and expert witnesses at trial; analyzing privilege issues presented by trial testimony; preparing demonstratives; and determining Plaintiffs' order of proof.

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

principle, is 10552.12 hours, which includes 9502.57 attorney hours and 1049.55 hours spent by paralegals.

4. This firm has incurred a total of \$550,699.28 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:

<b>EXPENSE</b>	<b>AMOUNT</b>
Litigation Fund Contribution(s)	318,617.09
Travel/Hotel/Meals	205,843.25
Copying Services	700.65
Research Services	3,347.41
Telephone/Teleconference/Fax	4,355.12
FedEx/Messengers/Postage	126.37
Court Fees	0
Other (describe) office sup \$138.41; translation \$1396.59 and deposition exp \$16174.39	17,709.39
<b>TOTAL</b>	<b>550,699.28</b>

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.

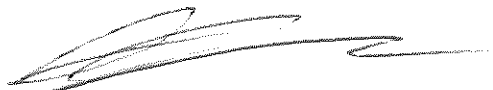
6. This firm's practice emphasizes antitrust class actions and this firm has substantial experience in pharmaceutical antitrust class action cases. A firm biography and the biography of each attorney currently employed with the firm who has worked on this case is

available upon request and on Hilliard & Shadowen LLP's website. *See*

<http://www.hilliardshadowenlaw.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.

Hilliard & Shadowen LLP

A handwritten signature in black ink, appearing to read "Steve D. Shadowen", written over a horizontal line.

Steve D. Shadowen

Dated: September 3, 2015