

EXHIBIT 22

**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 JAYNE A. GOLDSTEIN IN SUPPORT OF
PLAINTIFFS' MOTION FOR REIMBURSEMENT OF EXPENSES AND
CREATION OF A FUND FOR FUTURE LITIGATION EXPENSES**

I, Jayne A. Goldstein, declare as follows:

1. I am a partner at the law firm of Pomerantz 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 Co-Lead 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, legal research and preparation of Class Action Complaint
- Draft offensive discovery and respond to discovery from Defendants
- Review documents produced by Defendants
- Review document production from all End-Payor Plaintiffs, attend meet and confer calls regarding the productions, coordinate End-Payor Plaintiffs' production
- Prepare for and attend multiple depositions of multiple Class representatives
- Confer with multiple experts, defend expert depositions and prepare experts for trial
- Attend multiple pre-trial conferences and hearings, class certification hearing, mediation with mediator for First Circuit and oral argument for class certification appeal
- Designate testimony for trial
- Member of trial team, research issues during trial and attend trial, prepare witnesses for trial
- Review and comment on settlement agreement with Teva and accompanying Notice

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 5658.1 hours, which includes 5657.6 attorney hours and 0.5 hours spent by paralegals. My firm spent an additional 348.6 hours, including 348.6 attorney hours, finalizing the Teva settlement agreement and addressing notice and administrative issues related to the Teva settlement.

4. This firm has incurred a total of \$386,263.95 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)	313,708.89
Travel/Hotel/Meals	68,689.31
Service of Process Fees	440.50
Research Services	2,620.24
Telephone/Teleconference/Fax	345.50
FedEx/Messengers/Postage	113.84
Court Fees	226.00
Other (describe) clerical overtime	119.67
TOTAL	386,263.95

This firm has also incurred a total of \$ -0- in administrative and notice expenses associated with this litigation or the Teva settlement.

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 POMERANTZ's website. *See* www.pomlaw.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.

POMERANTZ LLP



Jayne A. Goldstein

Dated: September 8, 2015