

EXHIBIT 32

**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 THOMAS G. SHAPIRO IN SUPPORT OF
PLAINTIFFS' MOTION FOR REIMBURSEMENT OF EXPENSES AND
CREATION OF A FUND FOR FUTURE LITIGATION EXPENSES**

I, Thomas G. Shapiro, declare as follows:

1. I am a partner at the law firm of Shapiro Haber & Urmy 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 was appointed by the Court as a member of Plaintiffs' Executive Committee for the End-Payor Class Plaintiffs in this litigation, "to have a significant and meaningful participation in the prosecution" of the action on behalf of the End-Payor Class.

(Amended Case Management Order No. 1, Doc. No. 85). During the course of this litigation, my firm has been involved in the following activities:

- Assistance with preparation and filing of complaints on behalf of certain plaintiffs.
- Legal research and writing for the opposition to motions to dismiss.
- Extensive document review.
- Digesting deposition transcripts in preparation for trial.
- Attending selected court hearings.
- Providing local assistance to Co-Lead Counsel.
- Review of key pleadings and developments in the case.

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 446.80 hours, which includes 434.90 attorney hours and 11.90 hours spent by paralegals.

4. This firm has incurred a total of \$11,410.67 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)	\$10,000.00
Travel/Hotel/Meals	\$706.83
Copying Services	\$131.70
Research Services	\$442.62
Telephone/Teleconference/Fax	\$79.45
FedEx/Messengers/Postage	\$10.07
Transcripts	\$40.00
TOTAL	\$11,410.67

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 class actions. 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 Shapiro Haber & Urmy's website. *See www.shulaw.com.*

I declare under penalty of perjury under the laws of the United States of America this 26th day of August, 2015 that the foregoing is true and correct to the best of my knowledge, information, and belief.

s/Thomas G. Shapiro
Thomas G. Shapiro