

EXHIBIT 33

**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 AARON KAUFMANN IN SUPPORT OF
PLAINTIFFS' MOTION FOR REIMBURSEMENT OF
EXPENSES AND CREATION OF
A FUND FOR FUTURE LITIGATION EXPENSES**

I, Aaron Kaufmann, declare as follows:

1. I am a partner at the law firm of Leonard Carder 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 Plaintiff International Brotherhood of Electrical Workers Local 595 Health and Welfare Fund ("IBEW 595 H&W Fund") in this litigation. During the course of this litigation, my firm has been involved in the following activities:

- Investiagion of facts
- Review of documents
- Review and produce documents
- Preare for and defend deposition of Plaintiff IBEW 595 H&W Fund

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 57.80 hours, which includes 54.2 attorney hours and 3.6 hours spent by paralegals.

4. This firm has incurred a total of \$5,540.98 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:

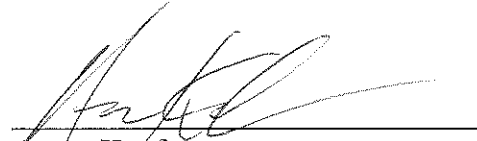
EXPENSE	AMOUNT
Litigation Fund Contribution(s)	\$ 5,250.00
Travel/Hotel/Meals	NA
Copying Services	NA
Research Services	\$ 130.56
Telephone/Teleconference/Fax	NA
FedEx/Messengers/Postage	\$ 24.42
Court Fees	\$ 100.00
Other (describe) – Notary service	\$ 36.00
TOTAL	\$5,540.98

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 representation of unions, health and welfare benefits trust fund, and employees in class and individual class actions and this firm has substantial experience in 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 Leonard Carder's website. See www.leonardcarder.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.

LEONARD CARDER



Aaron Kaufmann

Dated: September 3, 2015