

EXHIBIT 7

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

I, Peter Kohn, declare as follows:

1. I am a partner at the law firm of Faruqi & Faruqi, 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 Direct Class Plaintiffs in this litigation.

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

- Investigation of facts prior to filing the first Direct Purchaser complaint as well as legal research and factual investigation throughout the duration of the case;
- Drafting, editing and/or revising various briefs and documents filed with the Court as well as reviewing filings and communications in preparation of such documents, including, but not limited to: initial pleadings, the motion to transfer, the motion to dismiss, motions to compel, motions to strike expert testimony, motions for reconsideration, the motion for class certification, motions for summary judgment and accompanying Rule 56.1 statements, and motions in limine;
- Preparation of memoranda, presentations, reports, and charts on various case-specific issues;
- Review and analysis of productions of defendant and third-party documents; reviewing and producing responsive plaintiff documents; drafting, editing and reviewing discovery requests and responses; preparation of and prosecution of subpoenas; taking, defending, and/or attending seven (7) depositions and drafting summaries thereafter;

- Preparation for, attendance, and participation at trial, including, but not limited to, preparing witnesses, designating deposition excerpts and exhibits and negotiating with defendants concerning objections to evidence; and preparing summaries and trial briefing;
- Conferring with experts and assisting with preparation of their reports as well as review of expert-related materials; and
- Case management activities, including attending hearings, meetings, and conference calls as well as other administrative/procedural matters specific to this 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 11,481.6 hours, which includes 11,041.3 attorney hours and 440.3 hours spent by paralegals.

4. This firm has incurred a total of \$202,099.79 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)	\$137,500.00
Travel/Hotel/Meals	\$50,965.19
Copying Services	\$1,909.44
Research Services	\$4,419.82
Telephone/Teleconference/Fax	\$2,482.00
FedEx/Messengers/Postage	\$1,457.84
Court Fees	\$919.50
Other (describe)	\$2,446.00 (process servers)
TOTAL	\$202,099.79

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 Faruqi & Faruqi, LLP's website. *See Our Attorneys*, Faruqi & Faruqi, LLP, <http://www.faruqilaw.com/our-attorneys> (last visited Sept. 3, 2015).

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.

FARUQI & FARUQI, LLP

/s/ Peter Kohn

Peter Kohn

Dated: September 8, 2015