

EXHIBIT 9

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

I, Russell A. Chorush, declare as follows:

1. I am a partner at the law firm of Heim, Payne & Chorush, L.L.P. 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:

- Reviewing documents relevant to the alleged infringement, validity, and enforceability of the patents asserted by AstraZeneca against Teva, Ranbaxy and DRL regarding generic versions of Nexium ("the Nexium Patents");
- Preparing for, taking, and/or attending depositions of corporate fact witnesses relating to the Nexium Patents;
- Preparing for, taking, and/or defending depositions of expert witnesses relating to the Nexium Patents;
- Assisting experts retained by direct purchaser class plaintiffs ("DPCPs") in the preparation of their reports relating to the Nexium Patents;
- Defending, assisting in the defense of, and/or attending the deposition of DPCPs' experts relating to the Nexium Patents asserted by AstraZeneca;
- Preparing various court pleadings (*e.g.*, Daubert motions and motions to exclude) prior to and during the Nexium trial relating to the testimony of various proposed experts on the issues relating to the Nexium Patents.

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 1,699.10 hours, which includes 1,600.10 attorney hours and 99 hours spent by paralegals and/or assistants.

4. This firm has incurred a total of \$180,047.09 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)	120,000.00
Travel/Hotel/Meals	53,530.86
Copying Services	247.70
Research Services	4,324.00
Telephone/Teleconference/Fax	994.20
FedEx/Messengers/Postage	453.66
Court Fees	100.00
Other	396.67
TOTAL	180,047.09

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 Heim, Payne & Chorush, L.L.P.'s website. See www.hpcllp.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.

HEIM, PAYNE & CHORUSH, L.L.P.


Russell A. Chorush, J.D., Ph.D.

Dated: September 8, 2015