

EXHIBIT

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

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IN RE NEURONTIN ANTITRUST)	MDL Docket No. 1479
LITIGATION)	Master File No. 02-1390 (FSH)
)	
-----X)	

DECLARATION OF CHAD GIELEN

I, Chad Gielen, do declare as follows:

1. I am the President/Chief Executive Officer of Louisiana Wholesale Drug Co., Inc. (“LWD”) a named plaintiff and certified representative of the direct purchaser class in the above-captioned litigation. LWD is a pharmaceutical wholesale business located in Sunset, Louisiana.
2. I became the President/CEO of LWD in November 2011. Before assuming this position, I was employed as the General Manager of LWD beginning in 2009. I have personal knowledge of all matters attested to herein and am authorized to execute this declaration on behalf of LWD.
3. As a named plaintiff, LWD has actively participated in this action from its inception. Among other things, LWD has, through various employees, collected and produced documents and transactional data in response to defendants’ document requests and, through a corporate designee, answered questions at a deposition taken by defendants’ attorneys in June 2009. Throughout my tenure at LWD, I was consulted and kept informed about the progress of the case and the settlement negotiations that eventually resulted in a \$190 million cash settlement for the direct purchaser class.

4. Before his retirement in November 2011, Gayle White was the President of LWD. During his tenure as President, Mr. White participated in various aspects of this litigation on behalf of LWD, including the decision to file the action.

5. I wholeheartedly support final approval of the \$190 million settlement reached between the direct purchaser class and the defendants in this case. LWD is a sophisticated business enterprise and understands the risks, time, and expense associated with litigating complex antitrust cases like this one. While I am not a lawyer, I feel the settlement obtained by counsel to be an exceptional result based on experience in several other complex litigations. LWD has been involved in several actions alleging that generic drug competition was wrongfully delayed or suppressed. Relative to those cases, this case, which was litigated for over ten years, seemed uniquely complicated, risky, and expensive.

6. As a class representative, LWD understands that attorneys' fees are to be awarded by the Court in this class action litigation. However, had LWD retained the law firms and/or attorneys specified in the engagement letter to represent it in an individual action, LWD would have retained these same attorneys based on a 33 1/3% contingency fee in the event of settlement or compromise without trial and/or based on a 40% contingency fee in the event of trial, with any applicable contingency fee percentage computed in addition to out-of-pocket cost and expense.


7. LWD understands that the attorneys appointed by the Court to represent the class in this litigation intend to submit a request to the Court for an attorneys' fee award equal to one-third of the \$190 million settlement fund (plus accrued interest) and for reimbursement of the expenses they incurred litigating this case. LWD fully supports Class Counsel's application for an award of attorneys' fees and reimbursement of expenses as requested.

8. Class Counsel have repeatedly shown themselves to be experienced and highly skilled in achieving significant recoveries for my company and for direct purchasers more generally in cases alleging delayed or impeded generic competition, and other claims. In this case, Class Counsel provided exceptional legal services to LWD and the other direct purchasers comprising the aggrieved class in this complex case, which was not without substantial risk.

9. The benefit conferred upon the Class of direct purchasers by the settlement negotiated by Class Counsel is significant. Moreover, Class Counsel's requested fee is consistent with the fees that I understand have been awarded to class counsel in similar antitrust cases involving allegations of impeded generic competition in which LWD has actively participated as a representative plaintiff.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: June 16, 2014



Chad Gielen
President/Chief Executive Officer
Louisiana Wholesale Drug Co., Inc.