

EXHIBIT

15

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

In re Neurontin Antitrust Litigation

Master File No. 02-1390

THIS DOCUMENT RELATES TO:

Civil Action No. 02-1830

Civil Action No. 02-2731

LOUISIANA WHOLESALE DRUG
COMPANY, INC., MEIJER, INC. and
MEIJER DISTRIBUTION, INC., on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

PFIZER, INC. and WARNER-LAMBERT CO.,

Defendants.

**DECLARATION OF CYNTHIA ROGOWSKI IN SUPPORT OF MOTION FOR AN
AWARD OF ATTORNEYS', REIMBURSEMENT OF EXPENSES, AND INCENTIVE
AWARDS FOR CLASS REPRESENTATIVES**

I, Cynthia Rogowski, declare as follows:

1. I am Senior Counsel for Meijer, Inc., and Meijer Distribution, Inc., (together "Meijer"), 2929 Walker Avenue, NW, Grand Rapids, MI 49544, a named plaintiff and certified class representative of the direct purchaser class in this consolidated antitrust class action. As Senior Counsel of Meijer, I am authorized to execute this Declaration on behalf of Meijer.

2. On behalf of Meijer, I and others at Meijer participated in and were kept abreast of the status and progress of this litigation through regular communication with Class counsel.

Among other things, in this litigation Meijer has:

- a. through various of its employees collected and produced documents and voluminous transactional data regarding its purchases of Neurontin in response to Defendants' document requests;
- b. through corporate designee Jacquelyn J. DeBruler, Meijer's Pharmacy OTC Buyer and Merchandiser, answered questions at a deposition taken by Defendants' attorneys on June 10, 2009 pursuant to Federal Rule of Civil Procedure 30(b)(6), for which Ms. DeBruler was ably prepared and represented by Class counsel, including David P. Germaine of Vanek, Vickers & Masini, P.C. and Richard Kilsheimer of Kaplan, Fox & Kilsheimer, LLP.


3. I and others at Meijer were also kept informed of settlement proceedings, including participating in the December, 2010 mediation sessions, that resulted in a \$190 million cash settlement for the direct purchaser class. Meijer has been involved in several actions alleging that generic drug competition was wrongfully delayed or suppressed, and we believe the result achieved here is excellent. I understand that class members will receive a share of the net settlement fund essentially in proportion to their purchases of Neurontin during the relevant time period. I believe that is fair and efficient. Meijer, therefore, strongly supports the request for approval of the settlement.

4. As a certified class representative, Meijer understands that the amount of attorneys' fees is to be determined and awarded by the Court. However, had Meijer individually retained counsel to represent Meijer in this complex litigation, it would have retained these same attorneys on an hourly or contingency fee arrangement and would have been responsible for out-of-pocket costs and expenses.

5. I understand that the attorneys representing the direct purchaser class in this litigation intend to submit a request to the Court for an award of attorneys' fees equal to one third of the total settlement amount, and for reimbursement of expenses. Meijer supports this request, and we believe that class counsel provided services of the highest quality.

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

Dated: 6/24/17



Cynthia Rogowski
Senior Counsel