

EXHIBIT

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CLEMENTE MUELLER, P.A.
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*Liaison Counsel for the
Direct Purchaser Class Plaintiffs*

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY

IN RE NEURONTIN ANTITRUST
LITIGATION

MDL Docket No. 1479
Master Civil Action No. 02-1390
(FSH)

THIS FILING RELATES TO:
DIRECT PURCHASER CLASS CASES

Civil Action Nos.
02-1830 (FSH)
02-2731 (FSH)

**DECLARATION OF RUSSELL A. CHORUSH ON BEHALF OF HEIM,
PAYNE & CHORUSH, L.L.P. IN SUPPORT OF DIRECT PURCHASER
CLASS COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES
AND REIMBURSEMENT OF EXPENSES**

I, Russell A. Chorush, under penalty of perjury under the laws of the United States of America, declare as follows:

1. I am a member of the law firm of Heim, Payne & Chorush, L.L.P. ("HPC"). I am submitting this declaration in support of Class Counsel's motion for attorney fees and reimbursement of expenses in connection with services rendered

by HPC in the above-entitled actions. A copy of my resume is attached hereto as Exhibit 1. The factual matters set forth and the assertions made herein are true and correct to the best of my knowledge, information and belief.

2. As a counsel of record in this case for the Direct Purchaser Plaintiffs, my firm has been integrally involved in many aspects of this litigation for six and one half years.

3. Organization of counsel is critical to the efficient management of complex litigation such as this case. My firm coordinated assignments with Class Counsel through email and regular conference calls. All attorneys, paralegals, and law clerks in my firm were instructed to keep contemporaneous time records reflecting their time spent on this case.

4. From the inception of this litigation to the present, my firm expended the total of 800.80 hours in this litigation. The total lodestar for my firm is \$529,825.00.

5. The schedule below is a summary of the amount of time spent, from inception through present, by my firms' attorney and its support staff in this litigation, and the lodestar calculation based on current billing rates. The schedule was prepared from contemporaneous, daily time records regularly prepared and maintained by our firm, which are available at the request of the Court. Time

expended in preparing this application for fees and reimbursement of expenses has not been included in this request.

Attorneys and Staff	Status	Total Hours	Current Hourly Rate	Total Lodestar
Russell A Chorush	Attorney	639.20	750.00	479,400.00
Miranda Y. Jones	Attorney	27.50	450.00	12,375.00
Christopher M. Koepke	Attorney	113.85	300.00	34,155.00
Carrie J. Anderson	Paralegal	7.25	250.00	1,812.50
Amber L. Branum	Legal Assistant	.50	165.00	82.50
Natasha M. Baudoun	Legal Assistant	9.50	160.00	1,520.00
Amanda M. Wilson	Legal Assistant	3.00	160.00	480.00

6. My firm also has incurred a total of \$ 17,234.09 in unreimbursed expenses in connection with the prosecution of this litigation. These expenses were reasonably and necessarily incurred in connection with this litigation and include:

Expense	Amount
Outside Copies	128.06
Potage / Air Express Messengers	493.18
Filing Fees	350.00
Computer Research	1,480.05
Miscellaneous Case Expenses	507.62
Travel	14,275.18

7. The expenses incurred in this action are also reflected on the books and records of my firm. These books and records are prepared from expense

vouchers, check records and other source material and accurately record the expenses incurred.

Dated: 19 June, 2014

Russell Chorus

State of Texas
County of Harris

Before me, Amber L. Branum, on this day personally appeared Russell A. Chorus, known to me to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of the office this 19th day of June, 2014.

Amber L. Branum
Notary Public's Signature

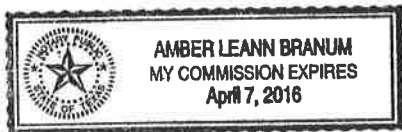


Exhibit 1

RUSSELL A. CHORUSH

EDUCATION

- University of Texas at Austin (B.S. Chemistry, Honors, 1989)
- Cornell University (Masters 1992 and Ph.D., Chemistry, 1994)
- University Houston Law Center (J.D., summa cum laude, 2001) Valedictorian of Class of 2001 and the Top Scorer on the July 2001 Texas Bar Examination

Awards & Honors

- Super Lawyer Rising Star (Thomson-Reuters) (2005, 2007, 2009-2011)
- University of Houston Law Center Rising Star Award (2005)
- Recipient of the highest score on the July 2001 Texas Bar Exam
- Valedictorian of the University of Houston Law Center Class of 2001

Dr. Chorush specializes in patent infringement and antitrust cases in the high technology arena. He has represented various clients in litigation in fields ranging from electronics to pharmaceuticals.

Prior to law school, Dr. Chorush served as a laboratory manager for Texas Instruments, Inc. ("TI") and Air Liquide Corporation. He is a co-author of the book "Handbook of Chemicals and Gases for the Semiconductor Industry" as well as a number of published articles and is a named inventor on several patents assigned to TI. Dr. Chorush is an author of six published articles in peer-reviewed journals including the Journal of the American Chemical Society, Analytical Chemistry and the Journal of Mass Spectrometry.

While at the University of Houston Law Center, Dr. Chorush served as the Notes & Comments editor on the Houston Law Review and received the following awards: the National Burton Award for Legal Achievement, the Dean's Scholarship, the Baker Botts Award, the West Group Outstanding Scholastic Achievement Award, the Suzanne White Booker Student Scholarship, the Locke Liddell & Sapp LLP—IP and Technology Scholarship, the Hutcheson & Grundy Scholarship, the Joan Garfinkel Glantz Prize, the Griggs & Harrison Award, and the LEX Awards (top score in his law school section) in the following areas: civil procedure, torts I, torts II, property II, and contracts II. Dr. Chorush also graduated as the valedictorian of his law school class and received the top score on the Texas Bar Examination in July of 2001.

Notable Current Cases

- ***In re K-Dur Antitrust Litigation***, MDL Docket No. 01-MD-1419 (D.N.J.) (representing plaintiffs)
- ***In re Neurontin Antitrust Litigation***, MDL Docket No. 02-MD-1479 (D.N.J.) (representing plaintiffs)
- ***King Drug Company Of Florence, Inc. et al. v. Cephalon, Inc., et al.***, Civ. No. 2:06-cv-1797 (E.D. Pa.) (representing plaintiffs)
- ***In re Androgel Antitrust Litigation***, MDL Docket No. 1:09-MD-2084 (N.D. Ga.) (representing plaintiffs)
- ***In re Prograf Antitrust Litigation***, MDL Docket No. 11-MD-2242 (D. Mass.) (representing plaintiffs)
- ***ROY-G-BIV Corporation v. ABB, Ltd. et al.***, Civ. No. 6:11-CV-00622 (E.D. Tex.) (representing plaintiff)
- ***Burlington Drug Co., Inc. v. Pfizer Inc. et al.***, Civ. No. 3:11-cv-6774 (D.N.J.) (representing plaintiffs)
- ***Louisiana Wholesale Drug Co., Inc. et al. v. Smithkline Beecham Corporation et al.***, Civ. No. 2:12-cv-00995 (D.N.J.) (representing plaintiffs)

Notable Past Cases

- ***In re Terazosin Hydrochloride Antitrust Litigation***, MDL Docket No. 99-MDL-1317 (S.D. Fla.) (represented plaintiffs, which obtained \$74 million settlement)
- ***In re Buspirone Antitrust Litigation***, Civ. No. 01-MDL-1410 (S.D.N.Y.) (represented plaintiffs, which obtained \$220 million settlement)
- ***In re Remeron Antitrust Litigation***, Civ. No. 2:02-CV-02007 (D.N.J.) (represented plaintiffs, which obtained \$75 million settlement)
- ***In re Oxycontin Antitrust Litigation***, MDL Docket No. 04-MDL-1603 (S.D.N.Y.) (represented plaintiffs, which obtained \$16 million settlement)
- **UniRAM Technology, Inc. v. Monolithic System Technology, Taiwan Semiconductor Manufacturing Company, Ltd., and TSMC North America**, Civ. No. 04-CV-1268 (N.D. Cal.) (represented plaintiff, which obtained \$30.5 million jury verdict)
- ***In re Tricor Antitrust Litigation***, Civ. No. 05-CV-340 (D. Del.) (represented plaintiffs, which obtained \$250 million settlement)
- ***ROY-G-BIV Corporation v. Fanuc Ltd. et al.***, Civ. No. 2:07-cv-418 (E.D. Tex.) (represented plaintiffs, which obtained favorable settlement)
- ***PACT XPP Technologies, AG v. Xilinx, Inc. and Avnet, Inc.***, Civ. No. 2:07-cv-563 (E.D. Tex.) (represented plaintiff, which obtained \$15.4 million jury verdict)
- ***Rochester Drug Co-Operative, Inc. v. Braintree Laboratories, Inc.***, Civ. No. 07-cv-142 (D. Del.) (represented plaintiffs, which obtained \$17.25 million settlement)