

**EXHIBIT**

**31**

CLEMENTE MUELLER, P.A.  
Jonathan D. Clemente  
218 Ridgedale Avenue  
Cedar Knolls, NJ 07927  
Tel.: 973/455-8008  
*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 OREN GISKAN IN SUPPORT OF DIRECT  
PURCHASER CLASS COUNSEL'S MOTION FOR AN AWARD OF  
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

I, Oren Giskan, 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 Giskan Solotaroff Anderson & Stewart. 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 me at my former firm, Prongay & Borderud, in the above-entitled actions. 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, Prongay & Borderud was involved, to the best of my recollection, in the factual investigation for and preparation of a complaint that was included in the above entitled actions.

3. From the inception of this litigation to the present, Prongay & Borderud expended a total of four hours in this litigation. The total lodestar for Prongay & Borderud is \$2700 (based on my current rate).

4. 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.

<b>Attorneys and Staff</b>	<b>Status</b>	<b>Total Hours</b>	<b>Current Hourly Rate</b>	<b>Total Lodestar</b>
Oren Giskan	Partner	4	\$675	\$2700

5. 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: June 17, 2014

  
Oren Giskan

Sworn to and subscribed before me this 17<sup>th</sup> day  
of June, 2014.

  
NOTARY PUBLIC

DARNLEY D. STEWART  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 02ST6186133  
Qualified in New York County  
My Commission Expires April 28, 2012  
JUNE 18, 2016

# EXHIBIT 1

**OREN GISKAN** is admitted to practice in the states of New York (1993) and Illinois (1990). He received his law degree from the University of Pennsylvania in 1990 and his Bachelor of Arts from the University of Chicago in 1986.

Mr. Giskan served as lead class counsel in *In re Check Loan Litigation*, N.D. Cal. 09-md-02032 (\$100 million settlement of claims related to increase of minimum monthly credit card payments); *Cohen v. JP Morgan Chase & Co. and JP Morgan Chase Bank*, E.D.N.Y. 04-cv-4098 (settlement of deceptive claims related to charging of mortgage fee resulting in a recovery of 100% of damages for class members); *Sebrow v. Allstate Insurance Company*, E.D. N.Y., CV-07-3929 (settlement of deceptive practice claims regarding non-renewal of homeowners insurance policies), *Education Station v. Yellow Book USA*, Superior Court of New Jersey (\$70 million settlement of false advertising claims), *Danielson v. Rockford Memorial Hospital*, Circuit Court of Winnebago County Illinois, No. 01 L 139 (settlement of patient billing claims under the Illinois Consumer Fraud Act), and *Truschel v. Juno Online Inc.*, Supreme Court of the State of New York, New York County, No. 01/602486 (settlement of consumer protection claims regarding failure to provide Internet service). He is actively litigating several other consumer fraud actions throughout the country as lead or class counsel. Prior to forming the firm of Giskan & Solotaroff in October 2002, Mr. Giskan worked for the firms of Prongay & Borderud, the Law Offices of James V. Bashian, P.C. and Zwerling, Schachter & Zwerling, LLP, in New York, New York where he was actively involved as lead counsel for plaintiffs in many securities class action lawsuits including: *Hal Bloomberg Trust v. Gencor Industries, Inc.*, M.D. Fla., 99-106-Civ-Orl; *Kaplan v. Prins Recycling Corp.*, D.N.J., 96 Civ. 2444; *In re Lady Luck Gaming Corporation Securities Litigation*, D. Nev., CV-S-95-266-LDG (RLH); *In re American Pacific Securities Litigation*, D. Nev., CV-S-93-00576-PMP; and *In re Foodmaker/Jack-in-the-Box Securities Litigation*, W.D. Wash., No. C93-517WD. He also actively participated as one of the lead counsel in coordinated nationwide class actions against America Online Inc. regarding its deceptive billing practices.

From 1990-92, Mr. Giskan was an associate with Jenner & Block in Chicago, Illinois where he focused on securities and general commercial litigation.