

EXHIBIT 11

**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 JOHN D. RADICE IN SUPPORT OF PLAINTIFFS'
MOTION FOR REIMBURSEMENT OF EXPENSES AND CREATION OF
A FUND FOR FUTURE LITIGATION EXPENSES**

I, John D. Radice, declare as follows:

1. I am a partner at the law firm of Radice Law Firm, PC. 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:

- Resided in Boston during trial with key responsibility for multiple witnesses and primary brief-writing responsibility for numerous motions and replies and in-depth work on jury instructions;
- Served as primary liason for multiple of plaintiffs' experts and worked extensively with those experts throughout the case;
- Took and defended numerous deposition of fact, 30(b)(6), and expert witnesses, including McGuire, McCool, Upadhye, Rosenthal, Bell and Palczuk;
- Drafted and edited many briefs and other submissions to the Court throughout the case;
- Investigated factual and legal issues before filing and throughout the case as developments warranted;
- Reviewed documents.

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 6,944 attorney hours.

4. This firm has incurred a total of \$220,796.74 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:

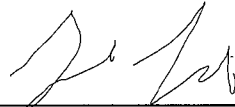
EXPENSE	AMOUNT
Litigation Fund Contribution(s)	\$120,000.00
Travel/Hotel/Meals	71,762.73
Copying Services	8,939.79
Research Services	8,635.10
Telephone/Teleconference/Fax	-
FedEx/Messengers/Postage	162.12
Court Fees	-
Other (expert (McCool) retainer and FOIA fees)	11,297.00
TOTAL	\$220,796.74

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 the Radice Law Firm's website. See www.radicelawfirm.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.

RADICE LAW FIRM, PC

A handwritten signature in black ink, appearing to read "John D. Radice", written over a horizontal line.

John D. Radice

Dated: August 21, 2015