

EXHIBIT 13

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 ARCHANA TAMOSHUNAS IN SUPPORT OF
PLAINTIFFS' MOTION FOR REIMBURSEMENT OF EXPENSES AND
CREATION OF A FUND FOR FUTURE LITIGATION EXPENSES**

I, Archana Tamoshunas, declare as follows:

1. I am a partner at the law firm of Taus, Cebulash & Landau, LLP. 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 Purchaser Class Plaintiffs in this litigation. During the course of this litigation, my firm has been involved in the following activities from the inception of the case: (1) drafting the complaint; (2) briefing and motions, including those related to venue transfer, class certification, and summary judgment; (3) document review, preparation for depositions, and factual analyses; (4) trial preparation including preparation of witness examinations, trial exhibits, deposition designations, and exhibit objections; and (5) briefing during trial, including bench memos, privilege motions and directed verdict motions.

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 1,394.20 hours, which includes 1,362.50 attorney hours and 31.70 hours spent by paralegals or summer associates.

4. This firm has incurred a total of \$124,444.44 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	
Copying Services	2,021.25
Research Services	2,356.10
Telephone/Teleconference/Fax	
FedEx/Messengers/Postage	67.09
Court Fees	
Other (describe)	
TOTAL	124,444.44

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 Taus, Cebulash & Landau's website. See <http://www.tcllaw.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.

Taus, Cebulash & Landau, LLP

A handwritten signature in black ink, appearing to read 'Archana Tamoshunas', written over a horizontal line.

Archana Tamoshunas

Dated: September 8, 2015