

EXHIBIT 21

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 J. DOUGLAS RICHARDS IN SUPPORT OF
PLAINTIFFS' MOTION FOR REIMBURSEMENT OF EXPENSES AND
CREATION OF A FUND FOR FUTURE LITIGATION EXPENSES**

I, J. Douglas Richards, declare as follows:

1. I am a partner at the law firm of Cohen Milstein Sellers & Toll PLLC ("Cohen Milstein"). 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 Co-Lead Counsel to the End-Payor Class Plaintiffs in this litigation. During the course of this litigation, my firm has been involved in the following activities:

- Investigating facts and conducting legal research in preparation for filing first complaints;
- Researching and drafting various pleadings, including opposition to motion to dismiss, motion to compel, motions for summary judgment and motions in limine;
- Reviewing and producing plaintiffs' documents; preparing for and defending named plaintiffs depositions;
- Preparing for and participating in meet and confers regarding various discovery-related disputes;
- Conferring with experts regarding preparation of expert reports; preparing for and defending expert depositions;
- Preparing for and participating in court conferences;

- Preparing for and participating in trial, including reviewing and selecting exhibits and deposition testimony, meeting and conferring with defendants, preparing witnesses, participating in trial strategy meetings and researching and drafting pleadings.

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 9,972.5 hours, which includes 9,661 attorney hours, 5.75 hours spent by investigators, 6 hours spent by law clerks, and 299.75 hours spent by paralegals. My firm spent an additional 26.5 attorney hours, finalizing the Teva settlement agreement and addressing notice and administrative issues related to the Teva settlement.

4. This firm has incurred a total of \$467,816.52 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)	317,636.97
Travel/Hotel/Meals	112,818.09
Copying Services	6,932.13
Research Services	14,026.50
Telephone/Teleconference/Fax	352.63
FedEx/Messengers/Postage	1,609.56
Court Fees	2,354.26
Other (Expert Witness/Consultant)	11,715.00
Other (Secretarial Overtime)	371.38
TOTAL	467,816.52

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 Cohen Milstein's website. *See* www.cohenmilstein.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.

COHEN MILSTEIN SELLERS & TOLL PLLC



J. Douglas Richards

Dated: September 8, 2015