

EXHIBIT 29

**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 FRANK R. SCHIRRIPA IN SUPPORT OF
PLAINTIFFS' MOTION FOR REIMBURSEMENT OF EXPENSES AND
CREATION OF A FUND FOR FUTURE LITIGATION EXPENSES**

I, Frank R. Schirripa, Esq., declare as follows:

1. I am a partner at the law firm of Hach Rose Schirripa & Cheverie, 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 End-Payor Class Plaintiffs and Certified Class Representatives – the Laborers' International Union of North America Local 17 Health Care Fund and the Laborers' International Union of North America Local 35 Health Care Fund in this litigation. During the course of this litigation, my firm has been involved in the following activities:

- Investigating factual allegations, drafting and filing two class action complaints; reviewing and providing additional allegations for the amended complaint.
- All aspects of discovery related to plaintiffs and class representatives, the Laborers' International Union of North America Local 17 and the Laborers' International Union of North America Local 35, including plaintiffs' document collection, review and production, responding to interrogatories, deposition preparation, and defending the deposition of LIUNA Local 35 Health Care Fund manager, Diane Klobukowski.
- Researched and drafted Plaintiffs' motion for partial summary judgment for noninfringement of AstraZeneca's '789 patent; researched and drafted a motion in limine; researched and drafted the opposition to defendants' motion for partial summary judgment as to an overarching conspiracy.

- Attended court hearings in connection with the appointment of co-lead counsel and case management, defendants’ motion for dismissal, plaintiffs’ motion for class certification and portions of the trial.
- Member of the trial team – trial preparation, including making deposition and exhibit designations; preparing class representatives/witness to testify at trial if needed; drafting witness evaluations; preparing cross-examination of defense merits and expert witnesses.

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 588.25 hours, which includes 550 attorney hours and 38.25 hours spent by paralegals and law clerks.

4. This firm has incurred a total of \$16,997.55 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	\$10,500.00
Travel/Hotel/Meals	\$5,264.55
Copying Services	\$45.00
Research Services	\$775.00
Telephone/Teleconference/Fax	\$63.00
FedEx/Messengers/Postage	-
Court Fees	\$350.00
TOTAL	\$16,997.55

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 Hach Rose Schirripa & Cheverie LLP's website. *See* <http://hrsclaw.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.

HACH ROSE SCHIRRIPA & CHEVERIE LLP

A handwritten signature in black ink, appearing to read 'Frank R. Schirripa', written over a horizontal line.

Frank R. Schirripa

Dated: September 2, 2015