

# **EXHIBIT 30**

**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 TODD M. SCHNEIDER IN SUPPORT OF  
PLAINTIFFS' MOTION FOR REIMBURSEMENT OF EXPENSES AND  
CREATION OF A FUND FOR FUTURE LITIGATION EXPENSES**

I, Todd M. Schneider, declare as follows:

1. I am a partner at the law firm of Schneider Wallace Cottrell Konecky Wotkyns, 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 in this litigation.

During the course of this litigation, my firm has been involved in the following activities:

- Investigation of facts;
- Draft complaint on behalf of International Brotherhood of Electrical Workers Local 595 Health and Welfare Fund v. AstraZeneca AB *et al.*, No. 12-cv-12378 (WGY);
- Draft consolidated amended complaint;
- Review and produce documents;
- Draft jury instructions; and
- Prepare for trial.

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 1113.85 hours, which includes 848.15 attorney hours and 265.70 hours spent by paralegals.

4. This firm has incurred a total of \$15,844.58 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:

<b>EXPENSE</b>	<b>AMOUNT</b>
Litigation Fund Contribution(s)	7,500.00
Travel/Hotel/Meals	6,373.64
Copying Services	0
Research Services	1,363.19
Telephone/Teleconference/Fax	0
FedEx/Messengers/Copies/Postage	607.75
Court Fees	0
Other (describe)	0
<b>TOTAL</b>	<b>15,844.58</b>

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 Schneider Wallace Cottrell Konecky Wotkyns LLP's website. See [www.schneiderwallace.com](http://www.schneiderwallace.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.

SCHNEIDER WALLACE COTTRELL  
KONECKY WOTKYNYS LLP

  
Todd M. Schneider

Dated: September 4, 2015