

EXHIBIT 31

**THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

In re: NEXIUM (ESOMEPRAZOLE) ANTITRUST LITIGATION	MDL No. 2409
This Document Relates to:	Civil Action No. 1:12-md-02409-WGY
All Actions	

**DECLARATION OF MICHAEL M. BUCHMAN IN SUPPORT OF PLAINTIFFS'
MOTION FOR REIMBURSEMENT OF EXPENSES AND CREATION OF
A FUND FOR FUTURE LITIGATION EXPENSES**

I, Michael M. Buchman, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a member of Motley Rice LLC. 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:

- Pre-trial and trial preparation
- Legal Research/Docket Research - Pacer
- Contract Attorneys- Document Review
- Trial witness preparation

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 867.35 hours, which includes 806.50 attorney hours and 60.85 hours spent by paralegals.

4. This firm incurred a total \$14,406.94 in non-reimbursed expenses in connection with the prosecution of this litigation through the end of trial, including return travel from trial.

5. These expenses are summarized as follows:

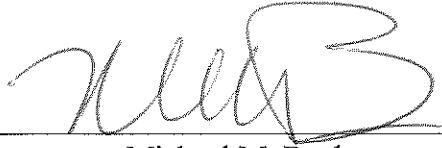
EXPENSE	AMOUNT
Litigation Fund Contribution(s)	\$10,000
Travel/Hotel/Meals	\$1,447.50
Copying Services	1,444.02
Research Services	\$863.24
Telephone/Teleconference/Fax	\$0.00
FedEx/Messengers/Postage	\$20.51
Court Fees	\$0.00
Other (describe) (Professional Fees)	\$631.67
TOTAL	\$14,406.94

6. 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 invoiced, 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.

7. This firm's practice includes antitrust class actions and certain attorneys at this firm have 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 Motley Rice LLC's website. *See www.motleyrice.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.

Dated August 26, 2015



Michael M. Buchman