

# **EXHIBIT 34**

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

I, Glen DeValerio declare as follows:

1. I am a partner at the law firm of Berman DeValerio. 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:

- Reviewing, editing and finalizing all court documents filed by the end-payor class plaintiffs;
- Filing all court documents on behalf of end-payor class plaintiffs;
- Providing advice on litigation strategy and how to address discovery and motion practice (i.e. filings under seal); and
- Making court appearances on behalf of end-payor class plaintiffs.

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 1,176 hours, which includes 1,174 attorney hours and 1.9 hours spent by paralegals.

4. This firm has incurred a total of \$5,422.13 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)	\$0
Travel/Hotel/Meals	\$902.22
Copying Services	\$2,481.49
Research Services	\$595.88
Telephone/Teleconference/Fax	\$110.12
FedEx/Messengers/Postage	\$149.92
Court Fees	\$950.00
Other (court reporter service/transcript fees)	\$232.50
<b>TOTAL</b>	<b>\$5,422.13</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. 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 Berman DeValerio's website. See [www.BermanDeValerio.com](http://www.BermanDeValerio.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 31, 2015

**BERMAN DEVALERIO**

*/s/ Glen DeValerio*

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