

EXHIBIT C

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE SUBOXONE (BUPRENORPHINE
HYDROCHLORIDE AND NALOXONE)
ANTITRUST LITIGATION**

MDL No. 2445

Master File No. 2:13-MD-2445-MSG

THIS DOCUMENT RELATES TO:

All Direct Purchaser Class Actions

**DECLARATION OF JESSICA R. MACAULEY ON BEHALF OF HAGENS BERMAN
SOBOL SHAPIRO LLP IN SUPPORT OF CLASS COUNSEL'S MOTION FOR
ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES AND SERVICE AWARDS
FOR THE NAMED PLAINTIFFS**

I, Jessica R. MacAuley, subject to the penalties of perjury provided by 28 U.S.C. § 1746, hereby declare as follows:

1. I am a partner at the law firm of Hagens Berman Sobol Shapiro LLP. I submit this declaration in support of Class Counsel's Motion for Attorneys' Fees, Reimbursement of Expenses and Service Awards for the Named Plaintiffs.

2. On August 7, 2013, Hagens Berman Sobol Shapiro LLP was designated as Co-Lead Counsel for the direct purchaser class. (ECF No. 44). On September 27, 2019, Hagens Berman Sobol Shapiro LLP was confirmed as Co-Lead Counsel for the certified direct purchaser class (ECF No. 588).

3. During the course of this litigation, my firm has been involved in the following activities on behalf of the direct purchaser class:

- Researched and drafted a complaint on behalf of Meijer, Inc. and Meijer Distribution, Inc. and the class;
- Drafted and edited motions before the Judicial Panel on Multi-District Litigation;
- Participated in drafting the opposition to the defendants' motions to dismiss;
- Participated in preparation for the motion to dismiss hearing, including the creation of a slide presentation deck;

- Drafted and negotiated with the defendant regarding pretrial stipulations, including the protective order and ESI protocol;
- Participated in drafting the opposition to Reckitt’s motion for reconsideration of the Court's motion to dismiss order;
- Reviewed documents produced by Reckitt from the investigation by the Federal Trade Commission that was produced before service by plaintiffs of requests for production. Review focused on issues related to the citizen petition and causation;
- Met and conferred with Reckitt counsel regarding missing metadata and other issues with the FTC production;
- Participated in drafting written discovery, including requests for production;
- Drafted white papers regarding citizen petition and causation issues;
- Drafted motions to amend and amended class complaint;
- Identified and worked closely with several consultants (financial and FDA regulatory specialists) and retained experts for scientific analysis of studies relied on by defendant for safety and other claims;
- Engaged in extensive meet and confer efforts with defendants following motion to dismiss order and written discovery service over objections;
- Drafted document and deposition subpoenas to non-parties including FOIA requests to FDA;
- Co-led lengthy meet and confer sessions with defendant regarding document search terms (spanning nearly eight months);
- Worked with class representative Meijer, Inc. to respond to requests for production and other discovery and assisted in document production;
- Met and conferred with Reckitt regarding production from class representative Meijer, drafted opposition to motion to compel and supplemental briefing regarding same;
- Reviewed and coded document production from Reckitt with a focus on treatment advocates, scientific bases for safety claims, and issues regarding pediatric safety and misuse;
- Partner, Jessica MacAuley, prepared for and was the lead examiner for three important fact depositions of witnesses:
 - Nicholas Reuter,
 - Vickie Seeger, and
 - Lenn Murrelle (30(b)(6) for non-party Venebio).
- Assisted in the preparation and second-chaired the deposition of class representative Meijer;
- Provided documents, strategy input, and drafted parts of outlines for the depositions of fact witnesses:
 - Kellie Taylor (FDA designee);
 - Patti Weston; and
 - Richard Powers.
- Researched issues related to fact witnesses who would be asserting their 5th amendment right and participated in drafting motions to the Court;

- Drafting questions to nine witnesses asserting their 5th amendment rights following the Court's order regarding same;
- Prepared for negotiations with counsel and attended multiple status conferences with court during discovery;
- Researched and drafted multiple memoranda about case theory and strategy with focus on safety and abuse/misuse claims;
- Researched potential experts and met and worked closely with retained experts, in particular Nicholas Jewell and Laurence Westreich;
- Partner, Jessica MacAuley, prepared for and was the lead examiner for two defense expert depositions:
 - Robert J. Geller; and
 - Lenn Murrelle.
- Provided documents, strategy input, and drafted parts of outlines for defense expert witness Dolores Curtis and Dr. Andrew Kwait.
- Researched and drafted potential *Daubert* motions against defense experts and edited drafts;
- Researched and drafted oppositions to *Daubert* motions filed against plaintiff experts Nicholas Jewell and Laurence Westreich;
- Worked closely with co-plaintiff groups – in particular Amneal and State Attorney Generals – including preparing for and attending strategy conferences about discovery and summary judgment;
- Drafted sections of summary judgment briefing – in particular regarding citizen petition and scientific evidence – and participated in editing briefs, statements of fact, and collecting exhibits;
- Assisted in preparations for summary judgment argument and prepared to argue summary judgment issues related to class representative Meijer, Inc.
- Led team tasked with serving subpoenas on witnesses who had previously asserted the 5th amendment and researched and drafted motions regarding implications of asserting the 5th amendment;
- Critical part of trial team with responsibility for direct testimony of key fact and expert witnesses, cross examinations of key fact and expert defense witnesses, significant leadership on pretrial filings and negotiations, and significant work on strategy and order of proof planning; and
- Prepared for and attended mediations on July 5, 2015, November 18, 2017, and January 24, 2023.

4. All attorneys, paralegals and other support staff at my firm were instructed to keep contemporaneous time records reflecting their time spent on this case and did so. My firm also kept books and records concerning the expenses my firm necessarily incurred in the prosecution of this litigation, prepared from receipts and other source material.

5. The schedule below reports the time spent by my firm’s attorneys, paralegals, and other support staff from inception until October 4, 2023 (the date that the settlement-in-principle was reached) and the time thereafter, through October 31, 2023, related only to the settlement. This submission does not include time relating to this motion. All hourly rates are my firm’s usual and customary rates for this and other similar matters.¹

Professional	Position	Hourly Rate as of October 4, 2023	Total Hours	Total Lodestar
Thomas Sobol	Partner	1200.00	308.1	\$369,720.00
David Nalven*	Partner	950.00	66.9	\$63,555.00
Lauren Barnes	Partner	935.00	402.4	\$376,244.00
Kristen Johnson	Partner	935.00	380.7	\$355,954.50
Greg Arnold	Partner	935.00	2.6	\$2,431.00
Erin Burns	Partner	850.00	2.8	\$2,380.00
Jessica MacAuley	Partner	780.00	3,694.0	\$2,881,320.00
Jeniphr Breckenridge*	Partner	600.00	30.5	\$18,300.00
Hannah Schwarzschild	Of Counsel	700.00	4,478.9	\$3,135,230.00
James Nicklaus	Of Counsel	700.00	88.0	\$61,600.00
Daniel Polonsky	Associate	400.00	17.8	\$7,120.00
Kristie LaSalle*	Associate	625.00	4.2	\$2,625.00
Rachel Downey	Associate	475.00	8.1	\$3,847.50
Raffi Melanson	Associate	600.00	0.3	\$180.00

¹ Former employees are identified with an asterisk. For former employees, the rates shown were the employees’ hourly billing rates at the time they left the firm.

Professional	Position	Hourly Rate as of October 4, 2023	Total Hours	Total Lodestar
Rebekah Glickman-Simon	Associate	450.00	9.8	\$4,410.00
Sophia Weaver	Associate	400.00	37.7	\$15,080.00
Audley Fuller	Staff Attorney	400.00	1.3	\$520.00
John Cruseaden*	Contract Attorney	300.00	70.7	\$21,210.00
Rickt Brown*	Contract Attorney	350.00	388.0	\$135,800.00
Ashley Folia*	Summer Associate	325.00	25.2	\$8,190.00
Manuel Rendo*	Summer Associate	325.00	13.6	\$4,420.00
Lauriane Williams	Law Clerk	390.00	0.5	\$195.00
Achebe Silva*	Paralegal	325.00	278.6	\$90,545.00
Christine Tierney	Paralegal	400.00	25.6	\$10,240.00
Dakota Snyder*	Paralegal	150.00	10.8	\$1,620.00
Daniel McGarry*	Paralegal	175.00	230.4	\$40,320.00
Erica Laning	Paralegal	350.00	1.0	\$350.00
Iman Khan	Paralegal	325.00	1.5	\$487.50
Jane MacKerron	Paralegal	350.00	22.2	\$7,770.00
Jennifer O'Brien*	Paralegal	350.00	9.4	\$3,290.00
Keiana James*	Paralegal	325.00	2.5	\$812.50
Linaris Falcon	Paralegal	375.00	50.0	\$18,750.00
Mado Glass*	Paralegal	250.00	153.3	\$38,325.00
Marcella Jackson*	Paralegal	375.00	181.7	\$68,137.50

Professional	Position	Hourly Rate as of October 4, 2023	Total Hours	Total Lodestar
Matthew Kavanah*	Paralegal	250.00	60.1	\$15,025.00
Megan Meyers	Paralegal	325.00	227.5	\$73,937.50
Mike Barker*	Paralegal	265.00	9.0	\$2,385.00
Nicole Swiec*	Paralegal	150.00	0.2	\$30.00
Nicolle Huerta	Paralegal	375.00	0.3	\$112.50
Taylor Largmann*	Paralegal	325.00	316.5	\$102,862.50
Valeria Alvarez	Paralegal	350.00	288.8	\$101,080.00
Radha Kerzan	Paralegal	325.00	0.2	\$65.00
Kevin Naughton	Investigator	325.00	2.0	\$650.00
Beatriz Burd*	Intern	50.00	37.9	\$1,895.00
Benjamin Mann*	Intern	50.00	14.8	\$740.00
Cayla Seder*	Intern	50.00	47.0	\$2,350.00
Genevieve McCloy*	Intern	50.00	2.3	\$115.00
Grace McGovern*	Intern	50.00	1.2	\$60.00
Jasmine Burgos*	Intern	50.00	4.2	\$210.00
Jessica Gwardschladse	Intern	50.00	61.3	\$3,065.00
Jiya Pinder*	Intern	50.00	65.0	\$3,250.00
Michael Arnold*	Intern	50.00	1.5	\$75.00
Olvia Binder*	Intern	50.00	8.2	\$410.00
Princess Dyer*	Intern	50.00	5.2	\$260.00

Professional	Position	Hourly Rate as of October 4, 2023	Total Hours	Total Lodestar
Sarah Wang*	Intern	50.00	25.0	\$1,250.00
Sofia Gausch*	Intern	50.00	14.1	\$705.00
Srinidhi Addanki*	Intern	50.00	91.5	\$4,575.00
Valeria Sepulveda*	Intern	50.00	18.7	\$935.00
Vittorio Penza*	Intern	50.00	7.0	\$350.00
Will Dathan	Intern	50.00	71.9	\$3,595.00
Total:			12,380.5	\$8,070,967.00

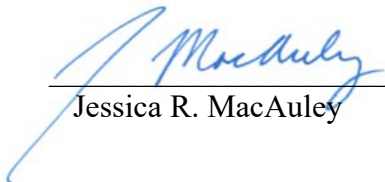
6. The schedule below reports a total of \$1,144,925.88 in unreimbursed expenses that my firm incurred.

Expense	Amount
Court reporting/transcription services	\$401.40
Filing fees	\$40.00
Litigation Fund Contributions	\$1,070,000.00
Postage/FedEx	\$1,817.17
Telephone	\$0.00
Photocopying	\$5,553.50
Travel/hotel/meals	\$38,754.19
Legal research and datasets	\$15,402.64
Process Servers and Subpoenas	\$1,641.00
Consulting and Expert Fees	\$11,315.59

Total	\$1,194,925.88
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Pursuant to 28 U.S.C. § 1746, I declare under the penalties of perjury that the foregoing is true and correct.

Executed this 27th day of December, 2023



Jessica R. MacAuley