

# EXHIBIT H

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE OPANA ER ANTITRUST LITIGATION	MDL No. 2580
THIS DOCUMENT RELATES TO:	Lead Case No. 14-cv-10150
All Actions	Hon. Harry D. Leinenweber

**DECLARATION OF BARRY S. TAUS ON BEHALF OF  
TAUS, CEBULASH & LANDAU, LLP IN SUPPORT OF CLASS COUNSEL’S MOTION  
FOR ATTORNEYS’ FEES, REIMBURSEMENT OF EXPENSES AND SERVICE  
AWARDS FOR THE NAMED PLAINTIFFS**

Barry S. Taus, subject to the penalties of perjury provided by 18 U.S.C. § 1746, does hereby declare as follows:

1. I am a Partner in the law firm Taus, Cebulash & Landau, LLP, attorneys for the Direct Purchaser Class Plaintiffs in the above-captioned case. I submit this declaration in support of Direct Purchaser Class Plaintiffs’ Motion for Attorneys’ Fees, Reimbursement of Expenses, and Service Awards for the Named Plaintiffs.

2. During the course of this litigation, my firm has been involved in various activities on behalf of the Direct Purchaser Class. Chief among those activities were:

- Investigating the case and analyzing/editing the initial complaint and consolidated amended complaint;
- Participating in the research and drafting of Plaintiffs’ opposition to Defendants’ motion to dismiss;
- Analyzing law and evidence regarding patent, agreement and regulatory issues relevant to Opana ER;
- Participating in numerous internal calls and meet and confers with Defendants regarding discovery issues;

- Conducting extensive discovery, including leading Direct Purchaser Class Plaintiffs' analysis and review of evidence regarding (1) the purpose, effect and valuation of the Endo Credit; and (2) the effect of the FDA's REMS program relating to Opana ER;
- Taking and defending depositions of fact and expert witnesses, including (1) Roberto Cuca, Endo's 30(b)(6) witness regarding various topics, including the Endo Credit; and (2) Todd Engle, Impax's 30(b)(6) witness regarding various topics, including Impax's forecasts of the expected impact of the entry of generic versions of Opana ER on Impax's (and Endo's) sales and profits;
- Working with economic, scientific, industry and regulatory experts concerning various aspects of the case, including the value of the Endo Credit, market power issues and regulatory and causation issues relating to FDA's REMS program;
- Participating in researching and drafting various briefs and related filings, including: oppositions to *Daubert* motions; affirmative *Daubert* motions; affirmative motions *in limine*; oppositions to motions *in limine*; and various pretrial submissions, including jury instructions;
- Participating in trial preparation, including analyzing and editing numerous deposition videos for use at trial; responding to Defendants' objections to Plaintiffs' deposition designations, and drafting objections to Defendants' deposition designations; managing Plaintiffs' construction of a comprehensive exhibit list, and Plaintiffs' objections to Defendants' exhibits; leading Direct Purchaser Class Plaintiffs' analysis of evidence related to issues regarding market power and the Endo Credit; and assisting trial counsel in developing themes and materials used in the examination or cross-examination of various trial witnesses.

3. All attorneys, paralegals and staff at my firm were instructed to keep contemporaneous time records reflecting their time spent on this case and did so.

4. The schedule below reports the time spent by my firm's attorneys, paralegals, and staff in this case from inception until July 4, 2022. This does not include time relating to this motion and post-trial briefing. All hourly rates are as of July 1, 2022, unless a person had left the firm previously, in which case the rate is the person's rate as of the time of departure from the firm (\* designates former employee).

<b>Professional's Name</b>	<b>Position/Status</b>	<b>Total Hours</b>	<b>Hourly Rate as of July 1, 2022</b>	<b>Total Lodestar</b>
Taus, Barry	Partner	1,810.50	865	\$1,566,082.50
Tamoshunas, Archana	Partner	1,021.20	740	\$755,688.00
Greaves, Miles	Partner	27.60	600	\$16,560.00
Rosin, Evan	Associate	160.70	425	\$68,297.50
Nelson, Gwendolyn	Associate	25.20	525	\$13,230.00
Bonoli, Tess	Associate *	1,172.30	350	\$410,305.00
Bonoli, Tess	Intern *	9.60	225	\$2,160.00
Brown, Neisha	Paralegal	34.00	225	\$7,650.00
<b>TOTAL</b>		<b>4,261.10</b>		<b>\$2,839,973.00</b>

5. My firm has also incurred a total of \$221,212.77 (as of July 4, 2022) in unreimbursed expenses in connection with the prosecution of the litigation. These expenses were reasonably and necessarily incurred in connection with this litigation and include:

<b>Expense</b>	<b>Amount</b>
Court reporter	-----
Document database	-----
Filing fees/court costs	\$50.00
Litigation fund assessment	\$200,000.00
Postage/air express/messengers	-----
Reproduction costs (outside vendor)	-----
Research and datasets	\$8,321.69
Telephone/teleconference/facsimile/photocopies	\$4,603.00
Travel/hotel/meals	\$8,238.08
<b>Total:</b>	<b>\$221,212.77</b>

6. The expenses incurred in this action are also reflected on the books and records of my firm. These books and records are prepared from expense vouchers, receipts and other source material and accurately record the expenses incurred.

7. Pursuant to 28 U.S.C. § 1746, I declare under the penalties of perjury that the foregoing is true and correct.

Executed this 16<sup>th</sup> day of September, 2022.

  
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Barry S. Taus