

# EXHIBIT J

**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 ANDREW KELLY ON BEHALF OF  
ODOM & DES ROCHES, LLC IN SUPPORT OF CLASS COUNSEL’S MOTION FOR  
ATTORNEYS’ FEES, REIMBURSEMENT OF EXPENSES AND SERVICE AWARDS  
FOR THE NAMED PLAINTIFFS**

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

1. I am a Manager and Member of the law firm Odom & Des Roches, LLC, attorneys for the Direct Purchaser Class Plaintiffs in the above-captioned case. I submit this declaration in support of Direct Purchaser 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 helping to prepare the first complaint in this matter;
- Drafting sections of Plaintiffs’ opposition to Defendants’ motion to dismiss;
- Conducting discovery on behalf of all Plaintiffs, including extensive negotiations with Defendants and third parties, and motion practice before the Court;
- Reviewing, analyzing, and digesting hundreds of thousands of pages of documents and data produced by Defendants and third parties, and preparing

for, taking and defending of fact and expert depositions;

- Working with patent, industry and regulatory experts concerning all aspects of the case;
- Participating in drafting various briefs and related filings, including the opposition to Defendants' motions for summary judgment; oppositions to *Daubert* motions; affirmative *Daubert* motions; affirmative motions *in limine*; oppositions to motions *in limine*; and various pretrial submissions;
- Preparing for and participating in trial, including direct and cross examination of expert witnesses, editing of deposition testimony to be played by video, and negotiations and argument concerning same.

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 and time thereafter related to this settlement only. 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).

Professional's Name	Position/Status	Total Hours	Hourly Rate as of July 1, 2022	Total Lodestar
Des Roches, Stuart	Partner	170.00	985.00	\$167,450.00
Kelly, Andrew	Partner	2241.00	930.00	\$2,084,130.00
Letter, Chris	Partner	40.50	765.00	\$30,982.50
Maas, Thomas	Of Counsel	2029.25	750.00	\$1,521,937.50
Chiorean, Dan	Partner	3.00	700.00	\$2,100.00
Glantz, Craig *	Of Counsel	54.50	650.00	\$35,425.00
Stow-Serge, Christopher *	Associate	3279.25	550.00	\$1,803,587.50
Schmidt, Anne *	Associate	2894.50	525.00	\$1,519,612.50
Hass, Amanda	Associate	278.00	525.00	\$145,950.00
Hoffman, Caroline	Associate	169.25	450.00	\$76,162.50
Fitzpatrick, John *	Associate	4.00	400.00	\$1,600.00
Fontenot, Kimberly	Paralegal	1967.25	290.00	\$570,502.50

Kennelly, Amy	Paralegal	1326.50	265.00	\$351,522.50
<b>TOTAL</b>		<b>14457.00</b>		<b>\$8,310,962.50</b>


5. My firm has also incurred a total of \$466,017.03 (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>
Service of Subpoenas	\$307.50
Document database	
Filing fees/court costs	\$200.00
Litigation fund assessment	\$369,725.68
Postage/air express/messengers	44.61
Reproduction costs (outside vendor)	10602.75
Research and datasets	847.36
Telephone/teleconference/facsimile	
Travel/hotel/meals	\$84,289.13
<b>Total:</b>	<b>\$466,017.03</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 15<sup>th</sup> day of September, 2022.

  
Andrew Kelly