

EXHIBIT E

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

IN RE OPANA ER ANTITRUST
LITIGATION

MDL No. 2580

Lead Case No. 14-cv-10150

THIS DOCUMENT RELATES TO:

Hon. Harry D. Leinenweber

All Actions

**DECLARATION OF RUSSELL ALLEN CHORUSH ON BEHALF OF
HEIM, PAYNE & CHORUSH IN SUPPORT OF CLASS COUNSEL'S MOTION FOR
ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES AND SERVICE AWARDS
FOR THE NAMED PLAINTIFFS**

Russell A. Chorush, 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 Heim, Payne & Chorush, LLP, 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 complaints, including the amended complaint, in this matter;
- Drafting sections of Plaintiffs' opposition to Defendants' motion to dismiss;
- Reviewing, analyzing, and digesting hundreds of thousands of pages of documents produced by Defendants (and third parties), and participating in all aspects of discovery, including taking and defending fact and expert depositions;
- Working with scientific and patent litigation experts concerning aspects of the

case relating to patents;

- Participating in drafting various briefs and related filings, including: the opposition to Defendants' motion for summary judgment; oppositions to *Daubert* motions; affirmative *Daubert* motions; affirmative motions *in limine*; oppositions to motions *in limine*; and various pretrial submissions, including jury instructions;
- Attending and participating in mediation; and
- Preparing for and participating in trial, including direct and cross examination of expert witnesses and presentation of testimony by video.

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, except as to former employees, 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 (July 1, 2022)	Total Lodestar (\$)
Russell A. Chorush	Partner	750.00	1,000.00	750,000.00
Michael F. Heim	Partner	1.00	1,000.00	1,000.00
James B. Baxter*	Former Partner	3,150.00	475.00	1,496,250.00
Chris M. First	Partner	6.25	485.00	3,031.25
Miranda Y. Jones*	Former Partner	485.40	650.00	315,510.00
Chris L. Limbacher	Associate	13.30	335.00	4,455.50
Carlos I. Ruiz	Associate	94.40	335.00	31,624.00
Kyle S. Ruvolo	Associate	498.25	290.00	144,492.50
Michael M. Dunbar	Associate	6.40	275.00	1,760.00
Emma W. Perry*	Former Associate	45.50	275.00	12,512.50
Carrie J. Anderson*	Former Paralegal	59.30	250.00	14,825.00
Angie McGinnis*	Former Paralegal	76.60	250.00	19,150.00
Amber L. Branum	Former Assistant	830.00	215.00	178,450.00
Natasha Baudoin*	Former Assistant	49.25	205.00	10,096.25
Suzie L. Wilson	Former Assistant	22.20	250.00	5,550.00
TOTAL		6,087.85		\$2,988,707.00

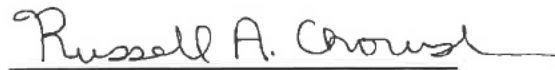
5. My firm has also incurred a total of \$ 299,290.78 (as of July 4, 2022) in unreimbursed expenses in connection with the prosecution of the litigation. These expenses were reasonably and necessarily incurred in connection with this litigation and include:

Expense	Amount (\$)
Filing fees/court costs	150.00
Litigation fund assessment	200,000.00
Postage/air express/messengers	4,473.43
Service of Subpoenas	265.92
Research and datasets	12,705.22
PACER fees	777.10
Travel/hotel/meals	78,093.41
Miscellaneous	2,825.70
Total:	\$299,290.78

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 18th day of September, 2022.


Russell A. Chorush