

EXHIBIT F

**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 Direct Purchaser Actions	Hon. Harry D. Leinenweber

**DECLARATION OF MATTHEW P. McCahill ON BEHALF OF
KAPLAN FOX & KILSHEIMER, LLP IN SUPPORT OF CLASS COUNSEL’S MOTION
FOR ATTORNEYS’ FEES, REIMBURSEMENT OF EXPENSES AND SERVICE
AWARDS FOR THE NAMED PLAINTIFFS**

Matthew P. McCahill, 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 of Kaplan Fox & Kilsheimer, LLP, attorneys for the Direct Purchaser Class Plaintiffs, Liaison Counsel for the Direct Purchaser Class, and co-counsel for Named Plaintiffs Meijer, Inc. and Meijer Distribution, Inc. (collectively, “Meijer”) 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 this litigation my firm has been involved in various activities on behalf of both our client Meijer and the Direct Purchaser Class. Chief among those activities were:

- Investigating the case and preparing the *Meijer* complaint, and helping to prepare the Direct Purchaser Plaintiffs’ Consolidated Amended Class Action Complaint;
- Researching and drafting sections of Plaintiffs’ opposition to Defendants’ motion to dismiss;
- Conducting offensive discovery efforts on behalf of all Plaintiffs, including

extensive negotiations with Defendants, the Federal Trade Commission, and third parties regarding interrogatories and document and FOIA requests, and certain related motion practice before the Court;

- Conducting, in conjunction with co-counsel, defensive discovery efforts on behalf of Named Plaintiff Meijer, including drafting of discovery responses, and helping to prepare and defend Meijer’s Rule 30(b)(6) deposition;
- Reviewing, analyzing, and digesting hundreds of thousands of pages of documents and data produced by Defendants, the Federal Trade Commission, and third parties, and preparing and taking fact depositions and helping to prepare for certain expert depositions;
- Working with economic experts concerning various aspects of the case;
- Researching and drafting briefs and related filings, including those in support of Plaintiffs’ motion for class certification and responding to Defendants’ opposition papers; in opposition to Defendants’ motions for summary judgment; affirmative motions *in limine*; oppositions to Defendants’ motions *in limine*; and various pretrial submissions, including the final pretrial order and jury instructions; and
- Preparing for and participating in trial, including presentation of testimony by video (and negotiations and argument concerning same), and numerous pre-trial and trial projects undertaken at the direction of Co-Lead Counsel.

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 fee motion and any 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 a former employee):

Professional’s Name	Position/Status	Total Hours	Hourly Rate as of July 1, 2022	Total Lodestar
Kaplan, Robert	Partner	18.40	1150	21,160.00
Kilsheimer, Richard	Partner*	336.30	900	302,670.00
McCahill, Matthew	Partner	1,308.40	840	1,099,056.00

Professional's Name	Position/Status	Total Hours	Hourly Rate as of July 1, 2022	Total Lodestar
Specks, Gary	Of Counsel	24.20	925	22,385.00
Uris, Jason	Associate	366.90	510	187,119.00
Schwartz, Aaron	Associate	321.00	510	163,710.00
Labaton, Ralph	Associate*	398.40	395	157,368.00
Howe, Walter	Associate	121.90	425	51,807.50
Fabiani, Charlotte	Law Clerk*	26.00	230	5,980.00
Fox, Brandon	Law Clerk	14.70	265	3,895.50
Moonsammy, Mandrika	Paralegal	32.80	350	11,480.00
Harvey, Tanya	Paralegal	25.50	300	7,650.00
Gomes, Wilfred	Paralegal*	2.00	270	540.00
Flecha, Samia	Paralegal	3.70	195	721.50
TOTAL		3,000.20		\$2,035,542.50

5. My firm has also incurred a total of \$174,651.59 (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
Court reporter	\$110.50
Document database	\$134.44
Filing fees/court costs	\$600.00
Litigation fund assessment	\$125,000.00
Postage/air express/messengers	\$1,842.40
Reproduction costs (outside vendor)	\$932.86
Research and datasets	\$23,209.89
Travel/hotel/meals	\$22,821.50
Total:	\$174,651.59

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 16th day of September, 2022.


Matthew P. McCahill