

# EXHIBIT G

**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 DAVID C. RAPHAEL, JR. ON BEHALF OF  
SMITH, SEGURA, RAPHAEL & LEGER IN SUPPORT OF CLASS COUNSEL'S  
MOTION FOR ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND  
SERVICE AWARDS FOR THE NAMED PLAINTIFFS**

David C. Raphael, Jr., 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 Smith Segura Raphael & Leger, LLP, attorneys for the Direct Purchaser Class Plaintiffs and class representative Value Drug Company ("Value Drug"). 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 initial complaints in this matter;
- Managing and coordinating discovery and document production by direct purchaser class representative Value Drug Company ("Value Drug"), including drafting responses to written discovery requests, negotiating with Defendants regarding the scope of discovery directed to Plaintiffs, collecting and reviewing Value Drug data and documents for production, and preparing for and defending depositions;
- Reviewing, analyzing, and digesting hundreds of thousands of pages of documents and data produced by Defendants, and participating in all aspects

of discovery, including taking and defending fact and expert depositions;

- Working with industry 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 preparation of plaintiff witnesses for trial testimony, trial examinations of fact and expert witnesses, editing of deposition testimony to be played by video, and negotiations and argument concerning same;
- Consulting with lead counsel and direct purchaser class representative, Value Drug Company, in connection with settlement discussions with Impax.

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
Smith, David	Senior Partner	7.90	800	\$6,320.00
Raphael, Jr. David	Partner	2,232.20	710	\$1,584,862.00
Segura, Susan	Partner	575.40	710	\$408,534.00
Leger, Erin	Partner	1,718.50	600	\$1,031,100.00
Brooks, Brian	Partner *	.40	575	\$230.00
Bolton, Mittie	Associate *	1,032.40	500	\$516,200.00
Martin, Michael	Contract Attorney	767.20	375	\$287,700.00
Blackwell, Nancy	Paralegal	806.60	225	\$181,485.00
Thompson, Donna	Paralegal	14.00	155	\$2,170.00
Patel, Aruna	Paralegal *	18.40	165	\$3,036.00

Windham, Mark	Paralegal *	5.30	200	\$1,060.00
<b>TOTAL</b>		<b>7,178.30</b>		<b>\$4,022,697.00</b>

5. My firm has also incurred a total of \$373,701.99 (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	\$782.00
Litigation fund assessment	\$295,495.98
Postage/air express/messengers	\$802.24
Reproduction costs	\$6,950.50
Research and datasets	\$2,382.89
Service of Subpoenas (and related expenses)	\$89.16
Telephone/teleconference/facsimile	\$3,490.08
Travel/hotel/meals	\$63,709.14
<b>TOTAL:</b>	<b>\$373,701.99</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.



David C. Raphael, Jr.