

# **Exhibit J**

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Novartis and Par Antitrust Litigation
This Document Relates To:  Direct Purchaser Action

1:18-cv-04361-AKH

**Declaration of Gerald L. Rutledge in Support of  
Direct Purchaser Plaintiffs' Motion for Attorneys' Fees, Reimbursement of Expenses, and  
Incentive Awards for the Named Plaintiffs**

I, Gerald L. Rutledge, subject to the penalties of perjury provided by 28 U.S.C. § 1746, do hereby declare as follows:

1. I am a partner at Law Office of Alfred G. Yates, Jr., P.C., 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 Incentive Awards for the Named Plaintiffs.

2. During this litigation, my firm was involved in the review of documentary evidence to marshal material facts in support of antitrust allegations on behalf of the Direct Purchaser Class. Our analysis related to evidence regarding:

- Anticompetitive negotiations and agreement terms;
- Generic launch intent and readiness in the absence of an anticompetitive agreement;
- Generic launch and anticompetitive agreement term valuation forecasts; and
- Litigation costs avoided by an anticompetitive agreement.

This became part of the internal Agreements Team White Paper that informed the case litigation strategy for the Direct Purchaser Plaintiffs.

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

4. The table below reports the time spent by my firm's attorneys in this case from May 2019 through July 2020. This does not include time related to the preparation of this declaration.

<b><i>Professional Name (Position)</i></b>	<b><i>Total Hours</i></b>	<b><i>Current Hourly Rate</i></b>	<b><i>Lodestar</i></b>
Alfred G. Yates, Jr. (Partner)	37.75	\$ 690	\$ 26,047.50
Gerald L. Rutledge (Partner)	963.00	\$ 690	\$ 664,470.00
<b>Totals:</b>	1,000.75		\$ 690,517.50

5. My firm worked in association with the Garwin Gerstein & Fisher LLP law firm which incurred all case related expenses.

6. I have experience working in other antitrust cases, and specifically with the Garwin Gerstein & Fisher LLP law firm in other antitrust cases including, but not limited to, contributions in the following cases: *Aggrenox Antitrust Litigation*, 3:14-md-02516, (USDC Conn.); *EpiPen Direct Purchaser Litigation*, No. 0:20-cv-00827 (USDC Minn.); *Hypodermic Products Antitrust Litig.*, 05-cv-1602 (USDC N.J.); *Lidoderm Antitrust Litig.*, 3:14-md-02521 USDC N.D. Ca.); *Natchitoches Parish Hospital Services District v. Tyco International, LTD et al.*, 05-12024 (D. MA); and *Suboxone (Buprenorphine Hydrochloride and Naloxone) Antitrust Litig.*, 2:13-md-02445 (USDC E.D. Pa.).

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

Executed this 15th day of February, 2023.

  
Gerald L. Rutledge, Esquire