

Exhibit F

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

In re Novartis and Par Antitrust Litigation

1:18-cv-04361-AKH

This Document Relates to:

All Direct Purchaser Actions

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

David C. Raphael, Jr., subject to the penalties of perjury provided by 28 U.S.C. § 1746, does hereby declare as follows:

1. I am a partner in the law firm Smith Segura Raphael & Leger, LLP ("SSRL"), attorneys for the Direct Purchaser Class Plaintiffs and class representative Drogueria Betances, LLC ("Betances"). I am admitted to practice *pro hac vice* in this matter. I submit this declaration in support of class counsel's motion for attorneys' fees and reimbursement of expenses in connection with services rendered by SSRL in the above-captioned litigation. The factual matters set forth and the assertions made herein are true and correct to the best of my knowledge, information, and belief.

2. SSRL has been representing drug wholesalers in antitrust litigation related to the delayed market entry of generic products for approximately twenty-five years. During that period, we have been extensively involved in assisting wholesaler clients (many of whom are members of the class in this case) in investigating violations of antitrust law in the pharmaceutical industry and pursuing claims as a result of those investigations. We are experienced in all aspects of pharmaceutical antitrust litigation, from the drafting of initial complaints through trial on the

merits. SSRL has been extensively involved in the development and prosecution of the Direct Purchasers' claims in the case. Chief among those activities were:

- Investigating the case and helping to prepare initial and amended complaints in this matter;
- Managing and coordinating discovery and document production by direct purchaser class representative Betances and other direct purchaser plaintiffs. This included drafting responses to written discovery requests; negotiating with Defendants regarding the scope of discovery directed to Plaintiffs; drafting various communications and participating in numerous meet-and-confer discussions with counsel for Defendants; participating in numerous conference calls and frequently corresponding with co-counsel regarding discovery directed to direct purchaser plaintiffs; coordinating with counsel for other class representatives and plaintiffs with respect to Defendants' discovery requests; coordinating Betances's search and collection of responsive data and documents; and conducting attorney review of Betances' data and documents for production;
- Communicating regularly with the principals of Betances throughout the litigation to keep them informed of all developments in the case;
- Preparing Betances's corporate designee for Rule 30(b)(6) deposition and defending that deposition;
- Reviewing and analyzing thousands of pages of documents and data produced by Defendants and preparing memoranda summarizing production on discrete topics of potential relevance;
- Issuing document subpoenas to, negotiating with, and obtaining production from, third parties PricewaterhouseCoopers, LLP, InvaGen Pharmaceuticals, Inc., Aurobindo Pharma USA, Inc., and Alembic Pharmaceuticals, Inc., the last of which required motion practice in the United States District Court for the Eastern District of Pennsylvania;
- Reviewing and analyzing production in response to the document subpoenas referenced above;
- Deposing and assisting with preparation for the deposition of Novartis witnesses;
- Assisting with briefing related to class certification with respect to Defendants' arguments on adequacy of class representatives;
- Preparing for trial, including review of deposition testimony for designations, selecting exhibits, and assisting in the assembly of the trial exhibit list;

- Participating in numerous conference calls and frequently corresponding with co-counsel regarding case management and litigation strategies; and
- Consulting with lead counsel and direct purchaser class representative, Betances, in connection with settlement discussions with Defendants.

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 January 31, 2023 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 December 31, 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).

Name	Status	Total Hours	Current Hourly Rate	Total Lodestar
David C. Raphael, Jr.	Partner	851.20	\$785	\$668,192.00
Susan C. Segura	Partner	649.30	\$785	\$509,700.50
Erin R. Leger	Partner	530.30	\$675	\$357,952.50
Brian D. Brooks *	Former Partner	128.80	\$575	\$74,060.00
Mittie J. Bolton *	Former Associate	177.70	\$500	\$88,850.00
Michael L. Martin *	Former Associate	333.00	\$375	\$124,875.00
Nancy Blackwell	Paralegal	320.00	\$250	\$80,000.00
Totals:		2,990.30		\$1,903,630.00

5. SSRL has also incurred a total of \$384,750.09 (as of January 31, 2023) 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:

Expenses	Amount
Filing Fees/Court Costs	\$656.60
Litigation Fund Assessments	\$370,000.00
Postage/Air Express/Messengers	\$634.89
Process Server/Subpoena Expenses	\$1,417.42
Reproduction Costs	\$2,124.20
Research and Datasets	\$3,884.22
Document Review Platform	\$1,887.50
Telephone/Teleconference/Facsimile	\$665.60
Travel/Hotel/Meals	\$3,479.66
Total:	\$384,750.09

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 February, 2023.

/s/ David C. Raphael, Jr.
David C. Raphael, Jr.