

Exhibit H

**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 Michael Roberts in Support of
Direct Purchaser Plaintiffs' Motion for Attorneys' Fees, Reimbursement of Expenses, and
Incentive Awards for the Named Plaintiffs**

I, Michael Roberts, subject to the penalties of perjury provided by 18 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bars of Arkansas, Tennessee, Texas, Florida, New York, Illinois, the U.S. District Courts for the Eastern Districts of Arkansas and of Wisconsin, the Eighth Circuit Court of Appeals, and the U.S. Supreme Court. I am the managing partner and the founder of Roberts Law Firm US, PC, attorneys for plaintiff KPH Healthcare Services, Inc. ("KPH") and 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. Roberts Law Firm US, PC has significant experience in antitrust law, class action practice, electronic discovery, case investigation, and settlement negotiation. I have served as lead and co-lead counsel and on executive committees in multiple complex class actions.

3. 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 preparing KPH's complaint;
- Preparation of initial disclosures on behalf of KPH;
- Participating in discovery; including, responding to discovery requests; negotiating custodians and search terms on behalf of KPH; reviewing and producing documents and data on behalf of KPH; participating in meet and confers on behalf of KPH; preparing for and defending KPH's 30(b)(6) deposition and negotiating topics related to same; and third-party discovery, including analysis of documents produced by third-party, drafting correspondence and participating in meet and confers with third-party; and,
- Litigation strategy, including participating in meetings with counsel for the Direct Purchaser Class Plaintiffs on litigation strategy.

4. 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.

5. The schedule below reports the time spent by my firm's attorneys, paralegals, and staff in this case from inception until January 24, 2023. All hourly rates are as of January 1, 2023, 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).

Name	Position	Hours	2022 Rate (\$/Hour)	Lodestar (\$)
Mike Roberts	Managing Partner	23.6	\$940	\$22,184
Debra Josephson*	Partner	145.1	\$760	\$110,276
Erich Schork	Partner	0.1	\$760	\$76
Karen Halbert	Partner	27.1	\$760	\$20,596
Sarah DeLoach	Partner	81.4	\$590	\$48,026
Stephanie Smith	Partner	250.5	\$780	\$195,390
Kelly Rinehart	Associate	4.7	\$550	\$2,585
Will Olson*	Associate	0.7	\$475	\$333
Angelicia Isclaw	Paralegal	12.7	\$170	\$2,159
April Burton	Paralegal	2.1	\$170	\$357
TOTAL		548		\$401,982

6. My firm has also incurred a total of \$7,591.52 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
Travel/Hotel/Meal Expenses	
Service of subpoenas	
Filing fees or other court costs	\$ 1,260.00
Document database vendor	\$ 537.90
Court transcripts	
Deposition transcripts	\$ 3,546.70
Consulting/Expert fees	
Cash expenses for which receipts are not avail.	
Litigation fund contributions	
Other (describe below)	\$ 2,246.92
TOTAL	\$ 7,591.52

Description of "Other" Expenses	Amount
Court Fees	\$ 92.00
Online Research	\$ 1,010.42
Postage	\$ 19.50
Ricoh Relativity Fees	\$ 1,125.00
OTHER TOTAL	\$ 2,246.92

7. 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.

8. 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.



Michael Roberts