

Exhibit I

**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 David P. Germaine in Support of
Direct Purchaser Plaintiffs' Motion for Attorneys' Fees, Reimbursement of Expenses, and
Incentive Awards for the Named Plaintiffs**

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

1. I am a shareholder in the law firm Sperling & Slater, LLC, 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. Over the course of this litigation, Sperling & Slater, P.C. has been involved in the following specific activities on behalf of the direct purchaser class:

- Investigating the background information and preparation of the complaint and case timeline.
- Responding to Rule 34 Requests for Production directed to class representative FWK.
- Document review and production for class representative FWK
- Responded to Interrogatories directed to class representative FWK.
- Preparing for and defending class representative FWK to testify at deposition.

- Assisting in the preparation of class certification briefing with regard to FWK.
- Keeping class representative FWK informed as to the status of the litigation

3. All attorneys and paralegals 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 and paralegals in this case from inception until December 28, 2022. This does not include time relating to this motion. All hourly rates are as of December 1, 2022.

Name	Position	Hours	2022 Rate (\$/Hour)	Lodestar (\$)
Joseph M. Vanek	Shareholder	55.3	\$1,035	\$57,235.50
David P. Germaine	Shareholder	20.3	\$845	\$17,153.50
John P. Bjork	Shareholder	106.5	\$765	\$81,625.50
Alberto Rodriguez	Shareholder	4.0	\$765	\$3,060.00
Martin Amaro	Associate	21.2	\$605	\$12,826.00
Diane Fan	Paralegal	19.65	\$385	\$7,565.25
A. Lisa Fridgeirsson	Paralegal	.3	\$385	\$115.50
TOTAL		227.25		\$179,428.25

5. My firm has also incurred a total of \$12,587.48 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	
Legal Research	\$100.05
Expert	\$3,300
Discovery Hosting	\$9,187.43
Total:	\$12,587.48

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 23rd day of February, 2022.



David P. Germaine