

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**IN RE: LIPITOR ANTITRUST  
LITIGATION**

**THIS DOCUMENT RELATES TO:**

*All Direct Purchaser Class Actions*

**MDL No. 2332**

**Master Docket No. 3:12-cv-2389  
(PGS/JBD)**

**SUPPLEMENTAL DECLARATION OF GREGORY T. ARNOLD ON  
BEHALF OF HAGENS BERMAN SOBOL SHAPIRO LLP IN SUPPORT OF  
DIRECT PURCHASER CLASS COUNSEL’S MOTION FOR ATTORNEYS’  
FEES, REIMBURSEMENT OF EXPENSES AND SERVICE AWARDS FOR  
THE NAMED PLAINTIFFS**

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

1. I am a partner at the law firm of Hagens Berman Sobol Shapiro, LLP (HBSS). I submit this declaration in further support of Direct Purchaser Class Counsel’s Motion for Attorneys’ Fees, Reimbursement of Expenses and Service Awards for the Named Plaintiffs.

2. I submitted a declaration on April 22, 2024, in support of direct purchaser class counsel’s motion for attorneys’ fee, reimbursement of expenses and service awards. Included in that April 22<sup>nd</sup> declaration was a summary of the time and lodestar relating to HBSS’ work on the case.

3. It has recently come to my attention that certain older time entries had 2019 billing rates inadvertently applied to time entries prior to that date. Upon learning of this, I did a manual review of all HBSS time entries and ensured that ‘historical rates’ in effect at the time of the time entries were applied to those earlier entries. This review had no impact on the time entries themselves (*i.e.*, the timekeeper who performed the task, the date on which the tasks were performed, the time spent on the task, the task(s) performed, etc.), although it did impact the calculation of the overall HBSS lodestar at “historic rates.”

4. The schedule below reports the time spent by my firm’s attorneys, paralegals and other support staff from inception until February 7, 2024 (the date that the settlement was executed) and time thereafter related only to the settlement, with the now-corrected “Lodestar Historical Rate” figures. This submission does not include time relating to this motion. In accordance with the Time and Expense Order, all hourly rates are reported below at both then-current (*i.e.*, historical) billing rates and at current billing rates, and contract attorneys have been billed at no more than \$250 per hour.<sup>1</sup>

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<sup>1</sup> Former employees are identified with an asterisk.

<b>Professional</b>	<b>Position</b>	<b>Hours</b>	<b>Lodestar Historical Rates</b>	<b>Lodestar Current Rates</b>
Addanki, Srinidhi*	Co-Op	0.2	\$5.00	\$6.00
Aramati, Adam M*	Paralegal	94.0	\$14,100.00	\$14,100.00
Arnold, Greg	Partner	2905.3	\$1,744,796.00	\$2,760,035.00
Arnold, Michael*	Staff	6.4	\$192.00	\$192.00
Barker, Michael*	Paralegal	77.5	\$11,625.00	\$20,537.50
Barnes, Lauren	Partner	98.1	\$47,571.70	\$93,195.00
Berman, Steve	Partner	1.5	\$1,087.50	\$2,025.00
Bruns, Cameron B*	Paralegal	235.8	\$35,370.00	\$35,370.00
Burd, Beatriz*	Staff	4.7	\$235.00	\$235.00
Burns, Erin	Partner	9.4	\$7,990.00	\$8,225.00
Compagna, Brian N*	Attorney	55.0	\$13,750.00	\$13,750.00
Cruseaden, John A*	Attorney	12.3	\$3,062.50	\$3,062.50
Devries, A J*	Paralegal	10.6	\$1,590.00	\$1,590.00
Downey, Rachel	Attorney	89.1	\$21,073.40	\$44,550.00
Falcon, Linaris	Staff	140.7	\$23,148.50	\$49,227.50
Gaw, Debra*	Attorney	148.3	\$46,714.50	\$46,714.50
Gunther, Steve P*	Paralegal	2.0	\$300.00	\$300.00
Gwardschaladse, Jess*	Staff	5.5	\$275.00	\$275.00
Hayes, Laura	Attorney	7.5	\$3,530.00	\$4,500.00
Jackson, Marcella*	Paralegal	32.1	\$11,442.50	\$12,037.50
Johnson, Kristen	Partner	802.4	\$314,570.20	\$762,280.00
Kavanah, Matthew*	Paralegal	78.1	\$19,295.00	\$19,525.00
Khan, Iman	Paralegal	27.1	\$6,990.00	\$9,485.00
Largmann, Taylor*	Paralegal	5.6	\$907.50	\$1,820.00
LaSalle, Kristie*	Attorney	174.6	\$67,763.20	\$96,030.00
MacKerron, Jane	Paralegal	0.3	\$97.50	\$112.50
Mann, Benjamin*	Staff	0.4	\$10.00	\$12.00
McGarry, Daniel J*	Paralegal	38.0	\$5,778.10	\$6,641.25
McGovern, Grace*	Staff	0.8	\$40.00	\$40.00
Nalven, David*	Partner	262.8	\$184,435.00	\$249,660.00

Professional	Position	Hours	Lodestar Historical Rates	Lodestar Current Rates
Nicklaus, James	Attorney	54.9	\$24,550.00	\$39,802.50
O'Brien, Jennifer*	Paralegal	0.8	\$271.00	\$280.00
Pelles, Emily*	Staff	1.3	\$352.50	\$357.50
Penza, Vittorio*	Staff	25.0	\$750.00	\$750.00
Portney, Joshua	Attorney	115.1	\$40,285.00	\$48,917.50
Seder, Cayla*	Staff	0.5	\$12.50	\$15.00
Shumate, Sage*	Staff	0.2	\$10.00	\$10.00
Silva, Achebe*	Paralegal	608.8	\$173,395.50	\$197,860.00
Sobol, Thomas	Partner	1149.4	\$909,313.50	\$1,551,690.00
Swiec, Nicole E*	Paralegal	39.5	\$5,926.50	\$5,926.50
Vasicek, Andrew* J	Attorney	90.8	\$27,225.00	\$31,308.75
Waggoner, Heidi	Staff	2.0	\$350.00	\$350.00
Wang, Sarah*	Staff	4.0	\$200.00	\$200.00
<b>Total:</b>		7418.2	\$3,770,386.60	\$6,133,001.00

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 16<sup>th</sup> day of May, 2024

  
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 Gregory T. Arnold