

# EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re: Seroquel XR (Extended Release  
Quetiapine Fumarate) Antitrust Litig.

Master Dkt. No. 20-1076-CFC

This Document Relates To:

All Direct Purchaser Class Actions

**DECLARATION OF DAVID B. ROCHELSON ON BEHALF OF GARWIN  
GERSTEIN & FISHER LLP IN SUPPORT OF CLASS COUNSEL’S  
MOTION FOR ATTORNEYS’ FEES, REIMBURSEMENT OF EXPENSES  
AND SERVICE AWARDS FOR THE NAMED PLAINTIFFS**

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

1. I am partner at the law firm of Garwin, Gerstein & Fisher LLP. I  
submit this declaration in support of Class Counsel’s Motion for Attorneys’ Fees,  
Reimbursement of Expenses and Service Awards for the Class Representatives.

2. During the course of this litigation, my firm has been involved in the  
following activities on behalf of the direct purchaser class:

- Investigating the case and helping to prepare the complaints,  
including the amended complaint, in this matter;
- Drafting Plaintiffs’ opposition to Defendants’ motion to dismiss;
- Leading discovery efforts on behalf of all Plaintiffs, including  
extensive negotiations with Defendants and third parties and  
motion practice before the Court;

- Reviewing, analyzing, and digesting hundreds of thousands of pages of documents and data produced by Defendants (and third parties);
- Drafting and managing enforcement of subpoenas served on key third parties;
- Preparing for and taking depositions of key fact and expert witnesses;
- Working with economic, scientific, industry and regulatory experts concerning all aspects of the case;
- Drafting papers in support of the motion for class certification;
- Serving as the primary drafters of dispositive motions such as the opposition to Defendants' motion for summary judgment; affirmative *Daubert* motions; oppositions to *Daubert* motions; affirmative motions *in limine*; oppositions to motions *in limine*; and various pretrial submissions;
- Serving a key role on Plaintiffs' trial team, including by managing the team, coordinating with co-counsel, negotiating with Defendants, formulating trial strategy, preparing witness lists, preparing live cross examinations of two key defense witnesses, designating testimony for presentation by video (including negotiations concerning same), preparing exhibit lists, preparing statements of fact and law to be litigated, arguing motions at the pretrial conference, and preparing jury instructions; and
- Negotiating settlement agreements with AstraZeneca and Handa.

3. GGF's senior paralegal also co-led the paralegal team at trial, including by managing deposition designations, war-room logistics and set-up, and preparing various motions, briefs, and related exhibits for filing.

4. All attorneys, paralegals and other support staff at my firm were instructed to keep contemporaneous time records reflecting their time spent on this

case, and did so. My firm also kept books and records concerning the expenses my firm necessarily incurred in the prosecution of this litigation, prepared from receipts and other source material.

5. The schedule below reports the time spent by my firm's attorneys, paralegals and other support staff from inception until May 1, 2025 (the date that the settlement-in-principle was reached with AstraZeneca). This submission does not include time relating to this motion. All hourly rates are my firm's usual and customary rates, for this and other similar matters as of May 1, 2025.<sup>1</sup>

<b>Professional</b>	<b>Position</b>	<b>Hourly Rate as of May 1, 2025</b>	<b>Total Hours</b>	<b>Total Lodestar</b>
Carl Baker*	Former Paralegal	\$475.00	92.75	\$44,056.25
Samuel Bonderoff	Partner	\$1200.00	1.50	\$1,800.00
Elena Tsang*	Former Partner	\$840.00	3.00	\$2,520.00
Claire Cimino	Paralegal	\$515.00	371.25	\$191,193.75
Deborah Elman	Partner	\$1200.00	41.75	\$50,100.00
Bruce Gerstein	Partner	\$1750.00	43.75	\$76,562.50
Jonathan Gerstein	Partner	\$1200.00	2,133.75	\$2,560,500.00
Kimberly Hennings*	Partner	\$990.00	693.60	\$686,664.00
Dan Litvin	Partner	\$1200.00	263.25	\$315,900.00

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<sup>1</sup> Former employees are identified with an asterisk. For former employees, the rates shown were the employees' rates at the time they left the firm.

Katie McGee*	Former Paralegal	\$350.00	8.95	\$3,132.50
Rimma Neman	Clerk	\$335.00	27.00	\$9,045.00
Joseph Oppen*	Partner	\$1300.00	90.80	\$118,040.00
Clare Pellegrini	Paralegal	\$515.00	702.25	\$361,658.75
David Rochelson	Partner	\$1200.00	2,280.25	\$2,736,300.00
Susan Roth*	Paralegal	\$515.00	17.25	\$8,883.75
Anna Tydniouk*	Former Associate	\$960.00	1,114.25	\$1,069,680.00
Apolinar Uriarte	Paralegal	\$485.00	428.00	\$207,580.00
Aakruti Vakharia*	Former Associate	\$435.00	43.25	\$18,813.75
Ashley Velasques*	Former Clerk	\$250.00	58.00	\$14,500.00
Avery Wolff*	Former Paralegal	\$125.00	0.50	\$62.50
<b>Total:</b>			8415.10	\$8,476,992.75

6. The schedule below reports a total of \$787,073.59 in unreimbursed expenses that my firm incurred.

<b>Expense</b>	<b>Amount</b>
Court reporting/transcription services	\$87.00
Filing fees	\$400.00
Litigation Fund Contributions	\$695,000.00
Express Shipping/Postage	\$1,212.14

Telephone/Teleconference/Zoom/LoopUp	\$787.28
Photocopying	\$1,951.75
Travel/hotel/meals	\$16,494.43
Legal research and databases	\$66,142.36
Supplies	\$1,003.53
Subpoenas	\$1,495.10
Consulting/Expert Fees	\$2,500.00
<b>Total</b>	<b>\$787,073.59</b>

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

Executed this 7th day of July, 2025

/s/ David Rochelson

# EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re: Seroquel XR (Extended Release  
Quetiapine Fumarate) Antitrust Litig.

Master Dkt. No. 20-1076-CFC

This Document Relates To:

All Direct Purchaser Class Actions

**DECLARATION OF DAVID F. SORENSEN ON BEHALF OF  
BERGER MONTAGUE PC IN SUPPORT OF CLASS  
COUNSEL’S MOTION FOR ATTORNEYS’ FEES,  
REIMBURSEMENT OF EXPENSES AND SERVICE AWARDS  
FOR THE NAMED PLAINTIFFS**

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

1. I am an Executive Shareholder at the law firm of Berger Montague PC (“BMPC”). I submit this declaration in support of Class Counsel’s Motion for Attorneys’ Fees, Reimbursement of Expenses and Service Awards for the Named Plaintiffs.

2. During the course of this litigation, BMPC has been involved in various litigation activities on behalf of Plaintiffs and the Class, including: (1) overarching litigation strategy; (2) overseeing and guiding various aspects of fact and expert discovery, including defending and taking economic expert depositions,

taking Party depositions, negotiating extensive document and data discovery from third-parties, and negotiating with Defendants for documents and transactional data; (3) dispositive and *Daubert* motion briefing; (4) oral argument, including concerning discovery disputes and motions *in limine*; (5) class certification briefing; (6) trial preparation; and (7) participating in settlement negotiations.

3. BMPC attorneys have developed specialized knowledge and experience in economic issues that arise in pharmaceutical antitrust cases such as this one, including relating to analysis and proof of monopoly power and the relevant antitrust market, class certification, and the calculation of damages. BMPC attorneys utilized this specialized knowledge and experience on behalf of the Class in this case, to great success. BMPC attorneys led efforts to obtain discovery relevant to proving AstraZeneca Pharmaceuticals LP and AstraZeneca UK Limited's ("AstraZeneca") monopoly power, damages, and class certification, including testimony, forecasting documents, sales data, and documents showing AstraZeneca's expectations concerning how the market would have taken shape in the but-for world free of AstraZeneca and Handa Pharmaceuticals, LLC's ("Handa" and, with AstraZeneca, "Defendants") alleged misconduct.<sup>1</sup>

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<sup>1</sup> Par Pharmaceutical, Inc. ("Par") was previously a defendant. Par filed for bankruptcy and claims against it have been discharged. D.I. 187, 662.

4. BMPC attorneys played a significant role in reviewing, analyzing, and digesting relevant documents and data produced by AstraZeneca, Handa, and third parties, and took three fact depositions.

5. BMPC attorneys also played an active role in expert discovery, supporting Plaintiffs' economic experts, Dr. Russell E. Lamb, Dr. Martha A. Starr, and Dr. Keith Leffler, and deposing AstraZeneca's economic expert Dr. Richard A. Mortimer and medical expert, Dr. Alan Newman.

6. BMPC attorneys were the primary drafters of Plaintiffs' motion for class certification. BMPC attorneys also significantly contributed to summary judgment and *Daubert* briefing, including opposing Defendants' motion for summary judgment, opposing Defendants' *Daubert* motions to exclude Dr. Leffler, Dr. Fix, Ms. Marchetti, and Ms. DeLeon; and Plaintiffs' affirmative *Daubert* motions to exclude Dr. Maria Garibotti.

7. BMPC attorneys were actively involved in settlement efforts, including negotiation of cooperation from Handa.

8. BMPC attorneys were actively working to prepare for trial at the time of settlement. For example, BMPC attorneys contributed significantly to the jury instructions; motion *in limine* briefing; preparing the Final Pretrial Order; identifying, reviewing, and exchanging exhibit lists, deposition designations, and objections; and were preparing to present opening statements, present and cross-

examine several fact witnesses and several of Plaintiffs' and Defendants' economic and medical expert witnesses at trial.

9. All attorneys, paralegals and other support staff at BMPC were instructed to keep contemporaneous time records reflecting their time spent on this case and did so. BMPC also kept books and records concerning the expenses BMPC necessarily incurred in the prosecution of this litigation, prepared from receipts and other source material.

10. The schedule below reports the time spent by BMPC attorneys, paralegals and other support staff from inception until May 1, 2025 (the date that the settlement-in-principle was reached with AstraZeneca). This submission does not include time relating to this motion nor time related to the final negotiation of the Settlement with AstraZeneca, submissions of the motion for preliminary approval of the Settlement Agreements, or notice and claims administration. All hourly rates are BMPC's usual and customary rates, for this and other similar matters.<sup>2</sup>

<b>Professional</b>	<b>Position</b>	<b>Total Hours</b>	<b>Hourly Rates of May 1, 2025</b>	<b>Total Lodestar</b>
Sorensen, David F.	Executive Shareholder	122.50	\$1,425.00	\$174,562.50

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<sup>2</sup> Former BMPC employees and former contract attorneys are identified with an asterisk. For those individuals, the rates shown were their rates at the time of their departure. All other rates are rates as of May 1, 2025.

<b>Professional</b>	<b>Position</b>	<b>Total Hours</b>	<b>Hourly Rates of May 1, 2025</b>	<b>Total Lodestar</b>
Curley, Andrew C.	Shareholder	3,150.50	\$1,005.00	\$3,166,252.50
Coslett, Caitlin G	Shareholder	282.60	\$1,000.00	\$282,600.00
Wallin, Michaela	Shareholder	16.40	\$855.00	\$14,022.00
Caplan, Zachary	Shareholder	5.60	\$925.00	\$5,180.00
Chaudhury, Aurelia*	Associate	101.30	\$470.00	\$47,611.00
Brinn, Hope Elizabeth	Associate	3.00	\$640.00	\$1,920.00
McGrath, Julia	Associate	2,369.10	\$700.00	\$1,658,370.00
Hollinger, J. Taylor	Associate	570.30	\$625.00	\$356,437.50
Sauder, Karissa*	Associate	32.70	\$450.00	\$14,715.00
Boman, Laurel	Associate	232.60	\$635.00	\$147,701.00
Etheridge, Icee	Associate	50.00	\$700.00	\$35,000.00
Crowe, Cate D.	Counsel	184.60	\$725.00	\$133,835.00
Osterwise, Jeff	Senior Counsel	1.80	\$815.00	\$1,467.00
Klein, Joseph P.	Senior Counsel	1,208.20	\$875.00	\$1,057,175.00
Schwartz, Richard Daniel	Senior Counsel	29.90	\$885.00	\$26,461.50
Choe, Caroline J	Paralegal	1,704.80	\$460.00	\$784,208.00
Filbert, David	Paralegal	8.10	\$470.00	\$3,807.00
Werwinski, Diane R.	Paralegal	420.10	\$460.00	\$193,246.00
Ginis, Haroula	Paralegal	72.70	\$460.00	\$33,442.00
Frohbergh, Patricia L.*	Paralegal	6.80	\$450.00	\$3,060.00
Leo, Susan L.	Paralegal	1.50	\$485.00	\$727.50
Seigel, Jessica*	Other	123.90	\$400.00	\$49,560.00
Stein, Mark*	Research Specialist	3.50	\$345.00	\$1,207.50
Hamner, Peter	Research Specialist	1.00	\$700.00	\$700.00
<b>Total</b>		<b>10,703.50</b>		<b>\$8,193,268.00</b>

11. The schedule below reports a total of \$758,749.25 in unreimbursed expenses that BMPC incurred.

Expense	Amount
Court reporting/transcription services	\$186.00
Filing fees	\$1,474.26
Litigation Fund Contributions	\$695,000.00
Postage/FedEx/Delivery/Freight	\$733.30
Telephone	\$26.73
Photocopying/Reproduction	\$11,798.50
Travel/hotel/meals	\$21,159.32
Research fees (including legal research, data, and business entity search fees for class certification)	\$28,304.08
Document Database Vendor	\$67.06
<b>Total</b>	<b>\$758,749.25</b>

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

Executed this First day of July, 2025



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David F. Sorensen

# EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re: Seroquel XR (Extended Release  
Quetiapine Fumarate) Antitrust Litig.

Master Dkt. No. 20-1076-CFC

This Document Relates To:

All Direct Purchaser Class Actions

**DECLARATION OF THOMAS J. MAAS ON BEHALF OF ODOM &  
DES ROCHES, LLC IN SUPPORT OF CLASS COUNSEL’S MOTION FOR  
ATTORNEYS’ FEES, REIMBURSEMENT OF EXPENSES AND SERVICE  
AWARDS FOR THE NAMED PLAINTIFFS**

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

1. I am a member and co-manager at the law firm Odom & Des Roches, LLC (“ODR”). I submit this declaration in support of Class Counsel’s Motion for Attorneys’ Fees, Reimbursement of Expenses, and Service Awards for the Named Plaintiffs.
2. During the course of this litigation, my firm has been involved in the following activities on behalf of the direct purchaser class.
3. ODR conducted pre-filing investigations and analysis alongside other class counsel, with a focus on the ability and willingness of generic ANDA filers to

enter the market earlier with less-expensive, AB-rated generic versions of Seroquel XR “but for” the challenged conduct.

4. Once the pre-filing investigation was completed and the complaints were filed, ODR assisted in drafting and revising the class Plaintiffs’ opposition brief to Defendants’ motion to dismiss.

5. ODR also played a significant role in fact discovery in this case, including drafting and revising document requests, interrogatories, and subpoenas for both Defendants and several third parties, and then negotiating the scope of document productions. ODR assisted in the review of the over 2 million pages of documents obtained from Defendants and third parties in this case. ODR also led Plaintiffs’ efforts to investigate and assess: (a) one of Defendants’ primary defenses in this case, which asserted pro-competitive justifications based on alleged manufacturing failures by prospective generic competitor Handa; (b) related highly technical manufacturing and regulatory issues, including documents from Handa and its various partners over time, including third parties Catalent, Deerfield, and Par; and (c) the ability of other generic competitors—including Accord—to enter the market earlier “but for” the challenged conduct.

6. ODR also constructed a deposition strategy and identified key witnesses associated with prospective generic competitors, ultimately deposing six

related fact witnesses as first-chair counsel for the class and contributing to several other related depositions.

7. For expert discovery, ODR led Plaintiffs' extensive efforts to search for, interview, and ultimately retain an appropriate technical expert (Dr. J. Fix), who eventually addressed the technical aspects of both Plaintiffs' and Defendants' patent and manufacturing theories. ODR attorneys led Plaintiffs' efforts to work with Dr. Fix to prepare the manufacturing aspects of his reply expert report and prepare him for his deposition; an ODR attorney also served as the first-chair attorney defending his deposition. ODR similarly had primary responsibility for retaining and working with Plaintiffs' FDA regulatory expert (Ms. J. DeLeon) as she prepared her expert report, including preparing her for a deposition and defending her at that deposition. ODR also took the lead in analyzing multiple expert reports from each of Defendants' opposing manufacturing and regulatory experts (J. Jobbins and E. Connolly), including the highly technical underlying substantive material cited therein. ODR attorneys also deposed both experts.

8. ODR was also a key, core member of the direct purchaser class Plaintiffs' trial team. Two ODR partners were designated to lead the examination of multiple key live witnesses at trial. ODR attorneys also took lead on or materially contributed to the deposition designations of several witnesses whose videotaped testimony would have been played at trial.

9. ODR attorneys also led the efforts for the direct purchaser class with respect to a number of related pre-trial submissions, motions, and contested evidentiary issues, including without limitation evidentiary objections to the hundreds of potential trial exhibits for both parties, briefing and oral argument on two *Daubert* motions, and a stipulation agreed to by the parties regarding manufacturing issues and a disputed potential rebuttal case. ODR attorneys also materially contributed to analysis, preparation, and/or drafting of a number of other contested pre-trial issues, including without limitation summary judgment and *Daubert* motions, motions in limine, and the final pretrial order.

10. ODR's senior paralegal also co-led the paralegal team at trial, including without limitation primary responsibility for exhibits, exhibit lists, and related objections. Both of ODR's paralegals also contributed materially to other essential trial preparation efforts, including deposition designations, war-room logistics and set-up, and preparing various motions, briefs, and related exhibits for filing.

11. All ODR attorneys, paralegals, and other support staff were instructed to keep contemporaneous time records reflecting their time spent on this case, and did so. ODR also kept books and records concerning the expenses the firm necessarily incurred in the prosecution of this litigation, prepared from receipts and other source material.

12. The schedule below reports the time spent by ODR's attorneys and paralegals from inception until May 1, 2025 (the date that the settlement-in-principle was reached with AstraZeneca). This submission does not include time relating to this motion. All hourly rates are ODR's usual and customary rates, for this and other similar matters as of May 1, 2025.<sup>1</sup>

<b>Professional</b>	<b>Position</b>	<b>Total Hours</b>	<b>Hourly Rate as of May 1, 2025</b>	<b>Total Lodestar</b>
Stuart E. Des Roches	Partner	105.25	\$1,200.00	\$126,300.00
Andrew W. Kelly*	Partner	10.50	\$1,185.00	\$12,442.50
Chris Letter*	Partner	486.20	\$925.00	\$449,735.00
Thomas J. Maas	Partner	2,410.25	\$900.00	\$2,169,225.00
Dan Chiorean	Partner	392.50	\$900.00	\$353,250.00
Amanda Hass*	Associate	1,564.75	\$750.00	\$1,173,562.50
Caroline L. Hoffman	Associate	845.75	\$600.00	\$507,450.00
Annie M. Schmidt*	Associate	2.50	\$525.00	\$1,312.50
Christopher Stow-Serge*	Associate	1.50	\$550.00	\$825.00
Kimberly Fontenot	Paralegal	836.00	\$450.00	\$376,200.00
Amy Kennelly	Paralegal	812.50	\$425.00	\$345,312.50

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<sup>1</sup> Former members and employees are identified with an asterisk. For former members and employees, the rates shown are their respective rates at the time they left the firm.

<b>Professional</b>	<b>Position</b>	<b>Total Hours</b>	<b>Hourly Rate as of May 1, 2025</b>	<b>Total Lodestar</b>
<b>Total:</b>		<b>7,467.70</b>		<b>\$5,515,615.00</b>

13. The schedule below reports a total of \$746,292.49 in unreimbursed expenses that my firm incurred.

<b>Expense</b>	<b>Amount</b>
Court reporting/transcription services	\$0 – N/A
Filing fees	\$0 – N/A
Litigation Fund Contributions	\$695,000.00
Postage/FedEx	\$2,315.96
Telephone	\$0 – N/A
Photocopying	\$6,798.50
Travel/hotel/meals	\$39,728.54
Legal research and datasets	\$2,449.49
<b>Total</b>	<b>\$746,292.49</b>

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

Executed this third day of July, 2025

/s/ Thomas J. Maas

# EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re: Seroquel XR (Extended Release  
Quetiapine Fumarate) Antitrust Litig.

Master Dkt. No. 20-1076-CFC

This Document Relates To:

All Direct Purchaser Class Actions

**DECLARATION OF CHRISTOPHER M. FIRST ON BEHALF OF HEIM,  
PAYNE, AND CHORUSH LLP IN SUPPORT OF CLASS COUNSEL’S  
MOTION FOR ATTORNEYS’ FEES, REIMBURSEMENT OF EXPENSES  
AND SERVICE AWARDS FOR THE NAMED PLAINTIFFS**

I, Christopher M. First, 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 Heim Payne & Chorush, LLP. I  
submit this declaration in support of Class Counsel’s Motion for Attorneys’ Fees,  
Reimbursement of Expenses and Service Awards for the Named Plaintiffs.

2. During the course of this litigation, my firm has led all patent-related  
aspects of the case on behalf of the direct purchaser class including the following:  
(1) performing a pre-lawsuit investigation of the merits relating to AstraZeneca’s  
Seroquel XR patents; (2) full participation in fact discovery including drafting  
patent-related requests for production and interrogatories, and preparing for and  
taking fact depositions related to patent issues; (3) assessing the documentary and

testimonial evidence produced by Handa and AstraZeneca, researching relevant legal issues, and formulating strategy and analysis on the merits of various legal positions and strategies; (4) full participation in expert discovery interacting with patent-related experts, overseeing the development of opening and reply expert reports, and taking depositions of Defendants' experts that relate to patent issues; (5) full participation in *Daubert* and MSJ practice, including key role in multiple hearings on those topics; and (6) trial preparation and substantive tasks relating to same.

3. All attorneys, paralegals and other support staff at my firm were instructed to keep contemporaneous time records reflecting their time spent on this case, and did so. My firm also kept books and records concerning the expenses my firm necessarily incurred in the prosecution of this litigation, prepared from receipts and other source material.

4. The schedule below reports the time spent by my firm's attorneys, paralegals and other support staff from inception until May 2, 2025 (the day after the settlement-in-principle was reached with AstraZeneca and trial team departed). This submission does not include time relating to this motion. All hourly rates are

my firm's usual and customary rates, for this and other similar matters as of May 1, 2025.<sup>1</sup>

Professional	Position	Total Hours	Hourly Rate as of May 1, 2025	Total Lodestar
Russell A. Chorush	P	221.80	1225	\$271,705.00
Michael F. Heim	P	2.50	1300	\$3,250.00
Chris M. First	P	2959.85	750	\$2,219,887.50
Carlos I. Ruiz	A	760.10	550	\$418,055.00
Kyle S. Ruvolo	A	3334.75	515	1,717,396.25
Michael B. Dunbar	A	222.10	465	\$103,276.50
Carrie J. Anderson*	PL	0.60	250	\$150.00
Amber L. Branum	PL	144.60	275	\$39,765.00
Ericka Tristan Torres	PL	3.50	250	\$875.00
Suzie L. Wilson	PL	2.00	275	\$550.00
<b>Total:</b>		<b>7651.8</b>		<b>\$4,774,910.25</b>

5. The schedule below reports a total of \$732,360.44 in unreimbursed expenses that my firm incurred.

Expense	Amount
Telephone/Teleconference/Facsimile	\$0.00

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<sup>1</sup> Former employees are identified with an asterisk. For former employees, the rates shown were the employees' rates at the time they left the firm.

Photocopies - In-House	\$0.00
Photocopies - Outside	\$1,757.10
Postage/Air Express/Messengers	\$0.00
Filing Fees	\$0.00
Research	\$2,285.46
Travel/Hotel/Meals	\$31,505.69
Litigation Fund Assessments	\$695,000.00
Other: Admission Pro Hac Vice	\$0.00
Other: Miscellaneous / books, publications for research purposes	\$161.65
Other: FedEx Overnight Delivery	\$1,650.54
Other: Expert Consultant Retainer	\$0.00
<b>Total</b>	<b>\$732,360.44</b>

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

Executed this 23 day of June, 2025:

/s/ Christopher M. First

# EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re: Seroquel XR (Extended Release  
Quetiapine Fumarate) Antitrust Litig.

Master Dkt. No. 20-1076-CFC

This Document Relates To:

All Direct Purchaser Class Actions

**DECLARATION OF PETER KOHN ON BEHALF OF  
FARUQI & FARUQI LLP IN SUPPORT OF CLASS COUNSEL’S  
MOTION FOR ATTORNEYS’ FEES, REIMBURSEMENT OF EXPENSES  
AND SERVICE AWARDS FOR THE NAMED PLAINTIFFS**

I, Peter Kohn, subject to the penalties of perjury provided by 28 U.S.C. § 1746, hereby declare as follows:

1. I am a partner at the law firm Faruqi & Faruqi LLP. 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, Reimbursement of Expenses and Service Awards for the Named Plaintiffs.

2. During the course of this litigation, my firm has been involved in the following activities on behalf of the direct purchaser class:

- Investigation of the case and preparing original and amended complaints;
- Drafting proposed discovery protective order and ESI protocol, and leading subsequent negotiations with Defendants regarding both;

- Drafting discovery requests directed to Defendants;
- Drafting subpoenas directed to third parties;
- Engaging in meet and confers with third parties regarding subpoenas;
- Leading the attorney team responsible for synthesizing evidence concerning Defendant AstraZeneca's motivation and ability to launch an authorized generic but-for the unlawful agreement;
- Contributing to the attorney team responsible for synthesizing evidence concerning generic competitors' ability to enter the market but-for the unlawful agreement;
- Reviewing documents and other materials, and assisting in preparing for and taking depositions of fact witnesses, as they pertained to causation and generic entry, including Brian Dell and Megan Smith.
- Interfacing with expert witnesses Russell L. Lamb, Ph. D. and Susan Marchetti in connection with their expert reports;
- Preparing for and defending the deposition of Ms. Marchetti;
- Drafting and assisting in drafting briefing (1) in opposition to Defendants' motion to dismiss for lack of jurisdiction; (2) in opposition to Defendants' motion to dismiss for failure to state a claim; (3) in support of plaintiffs' position in various discovery disputes; (4) in opposition to Defendants' motion to disqualify Dr. Keith Leffler and Ms. Marchetti; (5) in opposition to Defendants' motion for summary judgment; (6) in support of Plaintiffs' potential motions in limine; and (7) in support of Plaintiffs' positions in various trial structure disputes;
- Preparing for trial, including designating deposition testimony, identifying and assembling trial exhibits, drafting proposed jury instructions, reviewing and objecting to Defendants' designated

testimony and proposed trial exhibits, and preparing other materials in connection with the original and amended pretrial order; and

- Preparing for live witnesses at trial, including preparing demonstratives, selecting trial exhibits for Ms. Marchetti and drafting a trial examination for her expert testimony, drafting cross examination for Brian Dell, and assisting with preparation of witness outlines for other live trial witnesses.

3. All attorneys, paralegals and other support staff at my firm were instructed to keep contemporaneous time records reflecting their time spent on this case, and did so. My firm also kept books and records concerning the expenses my firm reasonably incurred in the prosecution of this litigation, prepared from receipts and other source material.

4. The schedule below reports the time spent by my firm's attorneys, paralegals and other support staff from inception until May 1, 2025 (the date that the settlements-in-principle were reached). This submission does not include time relating to this motion. All hourly rates are my firm's usual and customary rates, for this and other similar matters as of May 1, 2025.<sup>1</sup>

<b>Professional</b>	<b>Position</b>	<b>Total Hours</b>	<b>Hourly Rate as of 5/1/25</b>	<b>Total Lodestar</b>
Aloise, Anthony	Paralegal	9.30	\$470.00	4,371.00
Behnke, Derek	Paralegal	11.80	\$470.00	5,546.00
Calvello, David	Partner	69.10	\$670.00	\$46,297.00
Clark, Neill	Counsel	1,137.90	\$950.00	\$1,081,005.00

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<sup>1</sup> Former employees are identified with an asterisk. For former employees, the rates shown were the employees' rates at the time they left the firm.

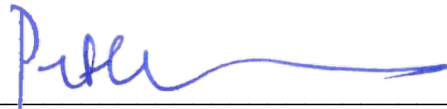
Doherty, Stephen	Counsel	146.90	\$800.00	\$117,520.00
Felderman, David*	Partner	2.00	\$690.00	\$1,380.00
Fields, Kristyn	Partner	14.30	\$690.00	\$9,867.00
Giacalone, Brian	Paralegal	1.70	\$375.00	\$637.50
Kohn, Peter	Partner	211.20	\$1190.00	\$251,328.00
Lukens, Joseph T.	Partner	8.10	\$1175.00	\$9,517.50
Steinfeld, Adam	Partner	1,444.00	\$950.00	\$1,371,800.00
Thompson, Timothy	Paralegal	24.30	\$335.00	\$8,140.50
Van Gorder, Michael*	Partner	62.20	\$615.00	\$38,253.00
<b>Total:</b>		<b>3,142.80</b>		<b>\$2,945,662.50</b>

5. The schedule below reports a total of \$701,537.24 in unreimbursed expenses that my firm incurred.

<b>Expense</b>	<b>Amount</b>
Court reporting/transcription services	\$0.00
Filing fees	\$675.00
Litigation Fund Contributions	\$695,000.00
Postage/FedEx	\$446.22
Telephone	\$0.00
Photocopying	\$0.00
Travel/hotel/meals	\$2,241.96
Legal research and datasets	\$3,174.06
<b>Total</b>	<b>\$701,537.24</b>

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

Executed this 28th day of June, 2025.



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PETER KOHN

# EXHIBIT F

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re: Seroquel XR (Extended Release  
Quetiapine Fumarate) Antitrust Litigation

Master Dkt. No. 20-1076-CFC

This Document Relates to:

All Direct Purchaser Actions

**DECLARATION OF DAVID C. RAPHAEL, JR. ON BEHALF OF  
SMITH SEGURA RAPHAEL & LEGER, LLP IN SUPPORT OF CLASS  
COUNSEL’S MOTION FOR ATTORNEYS’ FEES, REIMBURSEMENT  
OF EXPENSES AND SERVICE AWARDS FOR THE NAMED  
PLAINTIFFS**

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

1. I am a partner with the law firm Smith Segura Raphael & Leger, LLP (“SSRL”). I submit this declaration in support of Class Counsel’s Motion for Attorneys’ Fees, Reimbursement of Expenses and Service Awards for the Named Plaintiffs.

2. During the course of this litigation, my firm has been involved in the following activities on behalf of the direct purchaser class:

- Investigating the case and helping to prepare initial and amended complaints in this matter;
- Participating in briefing in opposition to the defendants’ motions to dismiss, specifically including the drafting of sections relating to personal jurisdiction issues;

- Managing and coordinating discovery and document production by direct purchaser class representative Smith Drug and the other plaintiffs. This included drafting responses to written discovery requests; negotiating with the defendants regarding the scope of discovery directed to Smith Drug and the other plaintiffs; drafting various communications and participating in numerous meet-and-confer discussions with counsel for the defendants; participating in numerous conference calls and frequently corresponding with co-counsel regarding discovery directed to the plaintiffs; coordinating with counsel for the other plaintiffs with respect to the defendants' discovery requests; coordinating Smith Drug's search and collection of responsive data and documents; and conducting attorney review of Smith Drug's data and documents for production;
- Communicating regularly with the principals of Smith Drug throughout the litigation to keep them informed of all developments in the case;
- Preparing Smith Drug's corporate designee for Rule 30(b)(6) deposition and defending that deposition;
- Reviewing and analyzing the defendants' privilege logs and preparing objections to privilege log entries;
- Assisting with the development of strategies for negotiating with and obtaining production from third parties; implementing such strategies for subpoenas directed to third parties Accord, Lupin, TruPharma, and Pharmadax; and preparation for contemplated Rule 30(b)(6) depositions of Lupin and TruPharma;
- Preparing for trial, including coordination with Smith Drug to ensure the presence of a company representative during trial; preparation for the live trial examination of the witness for Smith Drug; issuing trial subpoenas to all defendant and third party witnesses within the subpoena power of the Court; participating in meet and confer conferences and otherwise negotiating, communicating, and coordinating with counsel for the subpoenaed trial witnesses; reviewing deposition testimony for designations; lodging objections to the defendants' deposition designations; and reviewing, and lodging objections to, the defendants' proposed trial exhibits.
- Participating in numerous conference calls and frequently corresponding with co-counsel regarding case management, litigation strategies, and trial preparation; and
- Consulting with lead counsel and direct purchaser class representative, Smith Drug, in connection with settlement discussions with the defendants.

3. All attorneys, paralegals and other support staff at my firm were instructed to keep contemporaneous time records reflecting their time spent on this case and did so. My firm also kept books and records concerning the expenses my firm necessarily incurred in the prosecution of this litigation, prepared from receipts and other source material.

4. The schedule below reports the time spent by my firm's attorneys, paralegals, and other support staff from inception through May 1, 2025 (the date the settlements-in-principle were reached). This submission does not include time relating to this motion. All hourly rates are my firm's usual and customary rates, for this and other similar matters as of May 1, 2025.<sup>1</sup>

<b>Name</b>	<b>Position</b>	<b>Total Hours</b>	<b>Hourly Rate as of May 1, 2025</b>	<b>Total Lodestar</b>
David C. Raphael, Jr.	Partner	508.00	\$825	\$419,100.00
Susan C. Segura	Partner	524.50	\$825	\$432,712.50
Erin R. Leger	Partner	367.70	\$710	\$261,067.00
Michael L. Martin *	Associate	15.00	\$375	\$5,625.00
Nancy Blackwell	Paralegal	297.00	\$265	\$78,705.00
Donna Thompson *	Paralegal	25.10	\$165	\$4,141.50
<b>Totals:</b>		1737.30		\$1,201,351.00

<sup>1</sup> Former employees and former contract attorneys are identified with an asterisk. For those individuals, the rates shown were their rates at the time of their departure.

5. The schedule below reports a total of \$708,993.84 in unreimbursed expenses that my firm reasonably and necessarily incurred, as of May 1, 2025:

<b>Expenses</b>	<b>Amount</b>
Litigation fund assessments	\$695,000.00
Postage/FedEx	\$435.49
Photocopying	\$1,244.70
Legal research and datasets	\$6,069.87
Telephone	\$40.43
Travel/hotel/meals	\$5,520.61
Trial subpoena and process server expenses	\$682.74
<b>Total:</b>	<b>\$708,993.84</b>

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

Executed this 3rd day of July, 2025.

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

# EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re: Seroquel XR (Extended Release  
Quetiapine Fumarate) Antitrust Litig.

Master Dkt. No. 20-1076-CFC

This Document Relates To:

All Direct Purchaser Class Actions

**DECLARATION OF CARMELLA P. KEENER ON BEHALF OF COOCH  
AND TAYLOR, P.A. IN SUPPORT OF CLASS COUNSEL’S MOTION FOR  
ATTORNEYS’ FEES, REIMBURSEMENT OF EXPENSES AND SERVICE  
AWARDS FOR THE NAMED PLAINTIFFS**

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

1. I am Director at the law firm of Cooch and Taylor, P.A.. I submit this  
declaration in support of Class Counsel’s Motion for Attorneys’ Fees,  
Reimbursement of Expenses and Service Awards for the Named Plaintiffs.

2. During the course of this litigation, my firm has been involved in the  
following activities, *inter alia*, on behalf of the direct purchaser class (the “DPP”):  
Drafting, editing, and finalizing or assisting in such activities conducted by other  
counsel for DPP as to all filings on behalf of DPP; researching issues relevant to  
filings on behalf of DPP; consulting on issues of Delaware practice; participating  
in strategy sessions regarding all litigation activities; attending all meet and confer

sessions with opposing counsel; and attending all in-person and telephonic proceedings before the Court.

3. All attorneys, paralegals and other support staff at my firm were instructed to keep contemporaneous records reflecting their time spent on this case, and did so. My firm also kept books and records concerning the expenses my firm necessarily incurred in the prosecution of this litigation, prepared from receipts and other source material.

4. The schedule below reports the time spent by my firm's attorneys, paralegals and other support staff from inception until May 1, 2025 (the date that the settlements-in-principle were reached). This submission does not include time and expenses relating to this motion. All hourly rates are my firm's usual and customary rates, for this and other similar matters as of May 1, 2025.

<b>Professional</b>	<b>Position</b>	<b>Total Hours</b>	<b>Hourly Rate as of May 1, 2025</b>	<b>Total Lodestar</b>
Carmella P. Keener	Director	407.40	550.00	\$224,070.00
Kevin D. Levitsky	Associate	12.40	350.00	\$ 4,340.00
<b>Total:</b>		<b>419.8 hours</b>		<b>\$228,410.00</b>

5. The schedule below reports a total of \$7,650.39 in unreimbursed expenses<sup>1</sup> that my firm incurred.


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<sup>1</sup> Lead Counsel reimbursed my firm for expenses at intervals during the litigation. Those additional expenses are reflected in the affidavits of the reimbursing firms.

<b>Expense</b>	<b>Amount</b>
Filing fees	\$256.70
Messenger Service (courtesy copies to Court, deliveries during hearings)	\$208.20
Photocopying (Courtesy copies for Court and copies for hearings)	\$6,539.65
Travel/hotel/meals	\$645.84
<b>Total</b>	<b>\$7,650.39</b>

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

Executed this 3rd day of July, 2025 at Wilmington, Delaware.

  
Carmella P. Keener, Esquire  
(DE Bar No. 2810)

# EXHIBIT H

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re: Seroquel XR (Extended Release  
Quetiapine Fumarate) Antitrust Litig.

Master Dkt. No. 20-1076-CFC

This Document Relates To:

All Direct Purchaser Class Actions

**DECLARATION OF MICHAEL L. ROBERTS ON BEHALF OF KPH  
HEALTHCARE SERVICES INC., a/k/a KINNEY DRUGS, INC. IN  
SUPPORT OF CLASS COUNSEL’S MOTION FOR ATTORNEYS’ FEES,  
REIMBURSEMENT OF EXPENSES AND SERVICE AWARDS FOR THE  
NAMED PLAINTIFFS**

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

1. I am Managing Partner at the law firm of Roberts Law Firm US, PC. I  
submit this declaration in support of Class Counsel’s Motion for Attorneys’ Fees,  
Reimbursement of Expenses and Service Awards for the Named Plaintiffs.

2. During the course of this litigation, my firm has been involved in the  
following activities on behalf of the direct purchaser class:

- Drafted the complaint filed on behalf of plaintiff KPH Healthcare  
Services, Inc., a/k/a Kinney Drugs, Inc. (“KPH”);
- Coordinated and managed defensive discovery on behalf of named  
plaintiff KPH including document production and written discovery;

- Prepared for and defended the deposition of KPH's corporate representative;
- Participated in meetings of plaintiffs' counsel during the course of the litigation and in preparation for trial;
- Analyzed and edited pleadings and settlement documents; and
- Prepared KPH exhibits and KPH's witness for trial.

3. All attorneys, paralegals and other support staff at my firm were instructed to keep contemporaneous time records reflecting their time spent on this case, and did so. My firm also kept books and records concerning the expenses my firm necessarily incurred in the prosecution of this litigation, prepared from receipts and other source material.

4. The schedule below reports the time spent by my firm's attorneys, paralegals and other support staff from inception until May 1, 2025 (the date that the settlement-in-principle was reached with AstraZeneca). This submission does not include time relating to this motion. All hourly rates are my firm's usual and customary rates, for this and other similar matters as of May 1, 2025.<sup>1</sup>

<b>Professional</b>	<b>Position</b>	<b>Total Hours</b>	<b>Hourly Rate as of May 1, 2025</b>	<b>Total Lodestar</b>
Burton, April	Paralegal	8.3	\$190.00	\$1,577.00

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<sup>1</sup> Former employees are identified with an asterisk. For former employees, the rates shown were the employees' rates at the time they left the firm.

DeLoach, Sarah	Partner	114.2	\$910.00	\$103,922.00
Halbert, Karen	Partner	33.7	\$1,145.00	\$38,586.50
Isclaw, Angelicia	Paralegal	26.3	\$190.00	\$4,997.00
Josephson, Debra	Partner	2.6	\$1,100.00	\$2860.00
Olson, Will	Associate	2.1	\$475.00	\$997.50
Rinehart, Kelly	Associate	1.8	\$800.00	\$1,440.00
Roberts, Mike	Partner	224.0	\$1265.00	\$283,360.00
Smith, Stephanie	Partner	412.4	\$1070.00	\$441,268.00
Zuckerman, Josh	Associate	3.5	\$715.00	\$2502.00
<b>Total:</b>		<b>828.9</b>		<b>\$881,510.50</b>

5. The schedule below reports a total of \$16,688.08 in unreimbursed expenses that my firm incurred.

<b>Expense</b>	<b>Amount</b>
Court reporting/transcription services	
Filing fees	\$1,476.99
Litigation Fund Contributions	\$10,000.00
Postage/FedEx	\$33.29
Telephone	
Photocopying	

Travel/hotel/meals	
Legal research and datasets	\$5,177.80
<b>Total</b>	<b>\$16,688.08</b>

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

Executed this 17th day of June, 2025

/s/Michael L. Roberts

# EXHIBIT I

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re: Seroquel XR (Extended Release  
Quetiapine Fumarate) Antitrust Litig.

Master Dkt. No. 20-1076-CFC

This Document Relates To:

All Direct Purchaser Class Actions

**DECLARATION OF DIANNE M. NAST ON BEHALF OF NASTLAW LLC  
IN SUPPORT OF CLASS COUNSEL’S MOTION FOR ATTORNEYS’ FEES,  
REIMBURSEMENT OF EXPENSES AND SERVICE AWARDS FOR THE  
CLASS REPRESENTATIVES**

I, Dianne M. Nast, declare as follows:

1. I am the owner of the law firm NastLaw LLC (“NastLaw”). I submit this declaration in support of Class Counsel’s Motion for Attorneys’ Fees, Reimbursement of Expenses and Service Awards for the Class Representatives.

2. During the course of this litigation, NastLaw’s attorneys and paralegals were involved in the following activities on behalf of the direct purchaser class: assisted with drafting and filing a class action complaint in the Southern District of New York captioned *KPH Healthcare Services, Inc. a/k/a Kinney Drugs, Inc. v. AstraZeneca Pharms. LP*, (20-cv-01096), which was later transferred to the District of Delaware (20-cv-01201) and related to the Master Docket (20-cv-01076); attended court proceedings remotely or in person, including

status conferences and the motion to dismiss oral argument; assisted with drafting case management statements; assisted with drafting the opposition to Defendants' Motion to Dismiss on behalf of Plaintiff KPH Healthcare Services, Inc.; drafted the Motion to Appoint Lead Counsel and participated in supplemental briefing; drafted the Local Rule 81.2 statement regarding motions pending at the time of transfer to the District of Delaware; assisted with drafting the motion for consolidation and coordination; and participated in conference calls and shared correspondence with co-counsel regarding case information and interactions with defense counsel.

3. All attorneys and paralegals at NastLaw were instructed to keep contemporaneous time records reflecting time spent on this case and they did so. Also, NastLaw kept books and records concerning the expenses it necessarily incurred in the prosecution of this litigation, prepared from receipts and other source material.

4. The schedule below reports the time spent by NastLaw's attorneys and paralegals from inception of the litigation until May 1, 2025 (the date that Plaintiffs reached a settlement-in-principle with AstraZeneca, the last remaining Defendant). This submission does not include time relating to this motion. All hourly rates are

NastLaw's usual and customary rates, for this and other similar matters as of May 1, 2025.<sup>1</sup>

Professional	Position	Total Hours	Hourly Rate as of May 1, 2025	Total Lodestar
Dianne M. Nast	Owner	200.1	\$1,400	\$280,140
Daniel N. Gallucci*	Attorney	39.4	\$1,200	\$47,280
Joseph N. Roda	Attorney	24.5	\$950	\$23,275
Michael S. Tarringer	Attorney	134.2	\$1,100	\$147,620
Michele S. Burkholder	Attorney	27.8	\$1,100	\$30,580
Joanne E. Matusko	Attorney	43.5	\$1,050	\$45,675
Michael D. Ford	Attorney	31.2	\$900	\$28,080
Christy Linder*	Paralegal	19.1	\$350	\$6,685
David Kesselman*	Paralegal	28.8	\$280	\$8,064
Julia Piccone*	Paralegal	3.2	\$360	\$1,152
<b>Total:</b>		<b>551.8</b>		<b>\$618,551</b>

5. The schedule below reports a total of \$61,620.12 in unreimbursed expenses that my firm incurred.

Expense	Amount
Litigation Fund Contributions	\$60,000
Postage/FedEx	\$3.55
Photocopying	\$35.75
Legal research and datasets	\$1,580.82

<sup>1</sup> Former employees are identified with an asterisk. For former employees, the rates shown were the employees' rates at the time they left the firm.

<b>Total</b>	<b>\$61,620.12</b>
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I declare that the foregoing is true and correct.

Executed this 9<sup>th</sup> day of July 2025 in Philadelphia, Pennsylvania.

/s/ Dianne M. Nast

Dianne M. Nast  
NASTLAW LLC  
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Philadelphia, Pennsylvania 19107  
Telephone: (215) 923-9300  
Facsimile: (215) 923-9302  
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