

# **EXHIBIT B**

**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)**

**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 support of Direct Purchaser Class Counsel's  
Motion for Attorneys' Fees, Reimbursement of Expenses and Service Awards for  
the Named Plaintiffs.

2. During the course of this litigation, HBSS been involved in a  
leadership role in virtually every major aspect of the litigation on behalf of the  
Direct Purchaser Class, including:

- Individuals at HBSS, including Thomas M. Sobol, undertook an extensive  
factual investigation beginning in April 2010. This investigation included  
obtaining and reviewing the transcripts from the underlying patent trial  
between Pfizer and Ranbaxy, analyzing those facts that could be obtained

from the public record and assessing them against potential legal theories. This work culminated in HBSS drafting and filing some of the initial complaints filed in this action. *See* Complaint, *Stephen L. LaFrance Holdings, Inc. v. Pfizer, Inc., et al.*, 11-cv-07003 (E.D. Pa. Nov. 9, 2011); Complaint, *Professional Drug Comp. v. Pfizer, Inc., et al.*, 11-cv-12058 (D. Mass. Nov. 21, 2011).

- Organizing plaintiffs' counsel in the consolidated action before this Court, culminating in the appointment of HBSS and Thomas M. Sobol being appointed as one of three co-lead counsel in the matter. *See* ECF No. 109.
- Working cooperatively with counsel for all plaintiff groups (end payors and retailers) while playing a major role in all strategic decisions in the litigation.
- Beginning in 2014, managing the litigation fund on behalf of the direct purchaser class, gathering, organizing, and ensuring payment of case-related shared expenses.
- Playing a major role in leading all aspects of the prosecution of this case, from drafting and arguing major motions such as the motions to dismiss, the appeal to the Third Circuit, and various other discovery-related motions throughout the case.
- Appearing at virtually every case conference and hearing throughout the nearly 12 years of litigation, oftentimes serving as a main spokesperson on behalf of the direct purchaser class.
- Assessing, leading, and implementing litigation strategy, appellate strategy, and mediation efforts.
- Playing a lead role in negotiating discovery protocols with defense counsel, spending months hammering out an ESI protocol, protective order, and privilege log protocol. This included motions practice before the Court, which HBSS attorneys played a leading role in briefing and arguing.
- Participating in, and often leading many discovery efforts, including the initial review of documents obtained from the defendants concerning the underlying litigation, assessing those documents and drafting comprehensive follow-up discovery that was served on the defendants.

- Drafting white papers and detailed factual summaries based on the documents produced in discovery on issues relating to the *Accupril* litigation, and the patent fraud allegations, including in-depth review of numerous foreign patent litigations relating to counterpart patents.
- Researching and drafting multiple motions filed in connection with the mediation.
- Played a lead role in mediation and settlement efforts throughout the case, culminating in the settlement with Pfizer.

3. In accordance with the Court's Order on Procedures and Guidelines for Direct Purchaser Plaintiffs' Counsel's Time and Expense Submissions (ECF No. 806) ("Time and Expense Order"), 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 February 7, 2024 (the date that the settlement was executed) and time thereafter related only to the settlement. 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>

<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	\$6.00	\$6.00
Aramati, Adam M*	Paralegal	94.0	\$14,100.00	\$14,100.00
Arnold, Greg	Partner	2,905.3	\$2,417,415.00	\$2,760,035.00
Arnold, Michael*	Staff	6.4	\$192.00	\$192.00
Barker, Michael*	Paralegal	77.5	\$15,420.00	\$20,537.50
Barnes, Lauren	Partner	98.1	\$55,972.25	\$93,195.00
Berman, Steve	Partner	1.5	\$1,462.50	\$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	\$30,211.50	\$44,550.00
Falcon, Linaris	Staff	140.7	\$42,905.50	\$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	\$3,695.00	\$4,500.00
Jackson, Marcella*	Paralegal	32.1	\$11,442.50	\$12,037.50
Johnson, Kristen	Partner	802.4	\$551,402.50	\$762,280.00
Kavanah, Matthew*	Paralegal	78.1	\$19,525.00	\$19,525.00
Khan, Iman	Paralegal	27.1	\$6,990.00	\$9,485.00
Largmann, Taylor*	Paralegal	5.6	\$1,804.50	\$1,820.00
LaSalle, Kristie*	Attorney	174.6	\$92,210.00	\$96,030.00
MacKerron, Jane	Paralegal	0.3	\$97.50	\$112.50

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

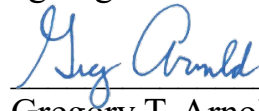
<b>Professional</b>	<b>Position</b>	<b>Hours</b>	<b>Lodestar Historical Rates</b>	<b>Lodestar Current Rates</b>
Mann, Benjamin*	Staff	0.4	\$12.00	\$12.00
McGarry, Daniel J*	Paralegal	38.0	\$6,641.25	\$6,641.25
McGovern, Grace*	Staff	0.8	\$40.00	\$40.00
Nalven, David*	Partner	262.8	\$239,535.00	\$249,660.00
Nicklaus, James	Attorney	54.9	\$33,002.50	\$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	\$15.00	\$15.00
Shumate, Sage*	Staff	0.2	\$10.00	\$10.00
Silva, Achebe*	Paralegal	608.8	\$195,914.50	\$197,860.00
Sobol, Thomas	Partner	1,149.4	\$1,104,997.50	\$1,551,690.00
Swiec, Nicole E*	Paralegal	39.5	\$5,926.50	\$5,926.50
Vasicek, Andrew J*	Attorney	90.8	\$31,308.75	\$31,308.75
Waggoner, Heidi	Staff	2.0	\$350.00	\$350.00
Wang, Sarah*	Staff	4.0	\$200.00	\$200.00
<b>Total:</b>		7,418.2	\$5,033,750.25	\$6,133,001.00

5. My firm incurred a total of \$385,491.81 in unreimbursed expenses, as set forth in the following table<sup>2</sup>:

<b>Expense</b>	<b>Amount</b>
Filing fees	\$1,608.73
Litigation Fund Contributions	\$319,786.29
Postage/FedEx	\$779.95
Telephone	\$4,153.72
Photocopying	\$1,290.73
Travel/hotel/meals	\$30,309.27
Legal research and datasets	\$13,807.63
Online time management platform	\$13,755.49
<b>Total</b>	<b>\$385,491.81</b>

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

Executed this 22<sup>nd</sup> day of April, 2024

  
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 Gregory T. Arnold

<sup>2</sup> In accordance with the Time and Expense Order, postage/FedEx are reported at actual cost; the above telephone expenses do not include general subscription or monthly lease costs associated with long-distance services and cellular phones; the maximum charge for photocopying is \$0.25 per page; and for any travel mileage, the IRS rules for mileage maximums were applied.