

EXHIBIT C

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

**IN RE: LIPITOR ANTITRUST
LITIGATION**

MDL No. 2332

THIS DOCUMENT RELATES TO:

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

All Direct Purchaser Class Actions

**DECLARATION OF DAVID F. SORENSEN ON BEHALF OF BERGER
MONTAGUE PC IN SUPPORT OF DIRECT PURCHASER 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. 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, and while serving as Co-Lead Counsel for the Class, my firm has been extensively involved in the litigation, including participating in the following activities on behalf of the Direct Purchaser Class: (1) developing the overarching litigation strategy; (2) drafting pleadings; (3) drafting and editing briefing related to Defendants' motion to dismiss, both to the District Court and to the Third Circuit Court of Appeals; (4) drafting and

editing class certification briefing; (5) preparing for and handling various oral arguments, including concerning Defendants' motion to dismiss and concerning Plaintiffs' motion for class certification, and including in the District Court and on appeal in the Third Circuit Court of Appeals; (6) overseeing and guiding various aspects of fact and expert discovery, including defending and taking economic expert depositions, overseeing and coordinating extensive document and data discovery from third-parties, and overseeing negotiations with Defendants for documents and transactional data; and (7) participating in mediation and settlement negotiations, including drafting mediation briefing.

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.¹

Professional	Position	Hours	Lodestar Historical Rates	Lodestar Current Rates
Sorensen, David F.	Executive Shareholder	818.10	\$712,203.50	\$1,137,159.00
Cramer, Eric	Executive Shareholder	149.00	\$106,313.00	\$207,110.00
Coslett, Caitlin G	Shareholder	615.10	\$451,465.50	\$599,722.50
Curley, Andrew C.	Shareholder	67.70	\$31,681.00	\$66,346.00
Noteware, Ellen T.	Shareholder	638.50	\$484,449.50	\$702,350.00
Parker, Phyllis M.*	Shareholder	3.50	\$2,240.00	\$2,590.00
Urban, Nick*	Shareholder	77.20	\$37,813.00	\$49,408.00
Walker, Daniel J.	Shareholder	17.80	\$10,237.00	\$17,355.00
Klein, Joseph	Senior Counsel	268.70	\$178,308.50	\$228,395.00
Langer, David	Senior Counsel	200.70	\$135,967.00	\$174,609.00
Schwartz, Richard D.	Senior Counsel	154.30	\$108,791.00	\$131,155.00
Simons, Daniel C.*	Senior Counsel	2,679.60	\$1,604,932.50	\$1,768,536.00
Thomas, Susan	Of Counsel	45.40	\$30,418.00	\$38,590.00
Boman, Laurel	Associate	22.40	\$12,651.00	\$13,552.00
Chaudhury, Aurelia*	Associate	2.40	\$1,056.00	\$1,128.00
Hollinger, Taylor	Associate	9.10	\$4,686.50	\$5,414.50

¹ Former employees are identified with an asterisk (*). For former employees, the lodestar at current rates is based on the employee's rate at the time they departed the firm.

Professional	Position	Hours	Lodestar Historical Rates	Lodestar Current Rates
MacNaughton, Jenna E.*	Associate	65.50	\$36,680.00	\$36,680.00
McGrath, Julia	Associate	347.20	\$197,973.00	\$234,360.00
Parron, John D.*	Associate	63.60	\$29,778.00	\$33,072.00
Rios, Sophia	Associate	25.80	\$12,384.00	\$18,318.00
Ripley, Josh*	Associate	17.10	\$5,154.00	\$8,208.00
Suter, Mark R.*	Associate	9.10	\$4,004.00	\$5,232.50
Bucher, Matthew K.*	Contract Attorney	81.50	\$20,375.00	\$20,375.00
Tyson, Steven G.*	Contract Attorney	507.70	\$126,925.00	\$126,925.00
Arteaga, Alexandra*	Paralegal	22.00	\$7,040.00	\$7,260.00
Choe, Caroline	Paralegal	695.30	\$244,914.50	\$305,932.00
Ebbesen, Anne N.*	Paralegal	2.40	\$744.00	\$816.00
Frohbergh, Patricia L.*	Paralegal	350.10	\$95,695.00	\$136,539.00
Ginis, Haroula	Paralegal	27.50	\$10,715.50	\$12,100.00
Kerr, Joseph R.*	Paralegal	7.50	\$2,277.50	\$2,287.50
Leo, Susan L.	Paralegal	9.70	\$3,345.50	\$4,365.00
Matteo, Shawn L.*	Paralegal	14.50	\$3,330.00	\$4,785.00
Shappell, David D.*	Paralegal	16.10	\$4,991.00	\$4,991.00
Werwinski, Diane R.	Paralegal	90.20	\$32,729.50	\$39,688.00
Stein, Mark*	Research Specialist	6.00	\$2,070.00	\$2,070.00
Seigel, Jessica*	Other	9.80	\$3,920.00	\$3,920.00
Total:		8,138.10	\$4,758,258.50	\$6,151,344.00

5. My firm incurred a total of \$669,979.32 in unreimbursed expenses, as set forth in the following table²:

Expense	Amount
Court reporting/transcription services	\$110.00
Filing fees	\$2,314.46
Litigation Fund Contributions	\$350,000.00
Postage/FedEx	\$752.27
Telephone	\$760.47
Photocopying	\$16,549.27
Travel/hotel/meals	\$8,947.51
Legal research and datasets	\$30,092.00 ³
Document database vendor	\$249,791.50
Consulting/Expert fees	\$10,121.84
Other (Search Fees - Business Entities)	\$540.00
Total	\$669,979.32

I declare under penalty of perjury that the foregoing is true and correct. (28 U.S.C. 1746).

² 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 black and white photocopying is \$0.25 per page; and for any travel mileage, the IRS rules for mileage maximums were applied.

³ This includes \$26,378.48 in expenses for legal research on Westlaw that were allocated to the case based on research done in this case. The allocated charges were less than the actual cost of the research conducted due to our contract with Westlaw.

Executed this 19th day of April, 2024



David F. Sorensen