

EXHIBIT I

**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 RUSSELL A. CHORUSH ON BEHALF OF HEIM,
PAYNE & CHORUSH, LLP IN SUPPORT OF DIRECT PURCHASER
CLASS COUNSEL'S MOTION FOR ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES AND SERVICE AWARDS FOR THE
NAMED PLAINTIFFS**

I, Russell Allen Chorush, 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 (“HPC”). 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, my firm has been involved in the following activities on behalf of the Direct Purchaser Class:

- Case investigation;
- Drafting of amended complaint;
- Assisting in various briefing including in response to Defendants’ motion to dismiss and summary judgment motion;

- Work with expert Mr. Jim Nawrocki relating to expert evaluation on Ranbaxy's likely monetary liability in the Accupril patent infringement case;
- Investigation and memoranda relating to assessment of subject matter jurisdiction for appellate proceedings;
- Review of prior judicial opinions relating to the Lipitor patents;
- Drafting of discovery requests including requests for production and interrogatories;
- Review of Lipitor patents and prosecution histories as well as Ranbaxy's ANDA product and DMF records, and development of various defenses relating to infringement, validity and inequitable conduct;
- Document database review and creation of a patent documents database;
- Evaluation of the Accupril litigation, including Ranbaxy's likelihood of success, its enablement and inventorship defenses, and likely monetary exposure;
- Evaluation of the size of the reverse payment based on the Accupril settlement;
- Investigation of Pfizer's foreign Lipitor patents and patent proceedings;
- Preparation of a variety of attorney work product including a white paper on patent issues and various memoranda relating to patent merits analysis and patent damages analysis;
- Preparing for, preparing presentations for, and attending various meetings and mediations.

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.¹ 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.²

| Professional | Position | Hours | Lodestar Historical Rates | Lodestar Current Rates |
|---------------------|-----------------|--------------|--------------------------------------|-----------------------------------|
| Russell Chorush | Partner | 774.50 | \$ 703,763.00 | \$ 910,037.50 |
| Allan Bullwinkel | Partner | 36.50 | \$ 17,362.50 | \$ 25,550.00 |
| Blaine A. Larson | Partner | 100.80 | \$ 50,400.00 | \$ 70,560.00 |
| Miranda Y. Jones | Partner* | 240.20 | \$ 100,317.50 | \$ 156,130.00 |
| Nick P. Patel | Associate* | 52.00 | \$ 15,300.00 | \$ 15,600.00 |

¹ The summed time records of two of HPC’s professionals has been rounded down to the nearest tenth of an hour from HPC’s contemporaneously maintained time records.

² Former employees are identified with an asterisk. For such individuals who did not have a 2024 rate, the “current rate” is the individual’s rate during the last year in which he or she worked at HPC.

| Professional | Position | Hours | Lodestar Historical Rates | Lodestar Current Rates |
|---------------------|-----------------|--------------|--------------------------------------|-----------------------------------|
| Carlos I. Ruiz | Associate | 340.00 | \$ 110,500.00 | \$ 170,000.00 |
| Kyle S. Ruvolo | Associate | 119.50 | \$ 32,535.00 | \$ 56,762.50 |
| Michael Dunbar | Associate | 155.60 | \$ 23,340.00 | \$ 66,130.00 |
| Carrie J Anderson | Paralegal* | 27.30 | \$ 6,746.25 | \$ 6,825.00 |
| Angie McGinnis | Paralegal* | 1.50 | \$ 375.00 | \$ 375.00 |
| Amber L. Branum | Paralegal | 179.70 | \$ 37,004.25 | \$ 49,417.50 |
| Natasha Baudoin | Assistant* | 18.50 | \$ 3,706.25 | \$ 3,792.50 |
| Amanda Wilson | Assistant* | 1.00 | \$ 155.00 | \$ 160.00 |
| Total: | | 2,047.10 | \$1,101,504.75 | \$ 1,531,340.00 |

5. My firm incurred a total of \$267,553.90 in unreimbursed expenses, as set forth in the following table³:

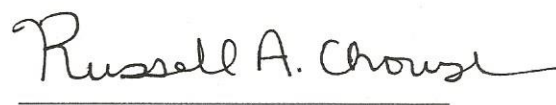
| Expense | Amount |
|-------------------------------|---------------|
| Filing fees | \$476.00 |
| Litigation Fund Contributions | \$250,000.00 |
| Postage/FedEx | \$152.09 |
| Photocopying | \$2,771.98 |
| Travel/hotel/meals | \$3,231.34 |

³ 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.

| Expense | Amount |
|-----------------------------|---------------------|
| Legal research and datasets | \$7,228.09 |
| Database User Fees | \$3624.40 |
| Journal Publications/Books | \$70.00 |
| Total | \$267,553.90 |

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

Executed this 20th day of April, 2024



Russell A. Chorush