

EXHIBIT J

**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 PETER S. PEARLMAN, ESQ. ON BEHALF OF COHN
LIFLAND PEARLMAN HERRMANN & KNOPF LLP IN SUPPORT OF
DIRECT PURCHASER CLASS COUNSEL'S MOTION FOR ATTORNEYS'
FEES, REIMBURSEMENT OF EXPENSES AND SERVICE AWARDS FOR
THE NAMED PLAINTIFFS**

I, PETER S. PEARLMAN, ESQ., subject to the penalties of perjury provided by 18 U.S.C. § 1746, hereby declare as follows:

1. I am Senior Counsel at the law firm of Cohn Lifland Pearlman Herrmann & Knopf LLP. 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:

- Review, revise, and file Complaints, Amended Complaints, CIS forms, Disclosure Statements, and related documents for Direct Purchaser Plaintiffs (DPPs).
- Prepare and effect service of process.

- Review Complaints filed by other plaintiffs—other DPPs, End Purchaser, Retailers, and California state plaintiffs.
- Prepare and file *pro hac vice* applications for DPP counsel, and monitoring, generally, the conduct of DPP *pro hac vice* counsel in accordance with responsibility under L. Civ. R. 101.1(c).
- Negotiate, review, and file scheduling stipulations in the District of New Jersey (DNJ) prior to and during Judicial Panel on Multidistrict Litigation (JPML) process.
- Review, revise, and submit filings before the JPML re consolidation; strategize and prepare for argument, and argue before the JPML for consolidation in the DNJ.
- Correspond with the Court and co-counsel of issue of potential conflict raised by Judge Sheridan.
- Prepare and respond to competing motions for consolidation/coordination and lead counsel in the DNJ; respond to Order from the Court regarding desire for resolution; negotiate resolution; negotiate, prepare, and revise CMO-1 with other plaintiff groups on behalf of the DPPs; prepare for and attend hearing re CMO-1.
- Review motions for stays; participate preparation of, and file oppositions.
- Attend tutorials for the Court on facts and law.
- Review and revise ESI Protocol and Discovery Confidentiality Orders.
- Prepare for, attend, and participate in numerous status conferences with the Court.
- Prepare, oppose, and argue motions to compel discovery.
- Oppose and argue motion to intervene.

- Review motions to dismiss; review, revise, file oppositions; review and discuss Order granting motion.
- Participate in preparation of motion to amended complaint.
- Prepare, revise, and file Rule 54 Motion re finality for appeal.
- Prepare Notices of Appeal and Amended Notices of Appeal and review notices from other parties.
- Prepare and file status reports with Third Circuit.
- Participate in briefing on both jurisdictional and 12(b)(6) appeals and prepare for and attend argument.
- Review Third Circuit opinions on both appeals; review mandates; prepare and submit Rule 79.4 Order; negotiate and litigate with Defendants with respect thereto.
- Review defendants' *certiorari* petition and related briefing.
- Participate in preparation of DPP Rule 26 Disclosures; review those of other Plaintiff groups and Defendants.
- Draft DPP position re Rule 16 conference.
- Review and revise Plaintiffs' position and review Defendant position on privilege defense.
- Participate in appointment of Discovery Master and presentation of positions on various issues, including motions to compel and privilege issues, to Judge Linares.
- Attendance at conference re mediation; consider mediators and arguments re issue of stay.
- Review and oppose motion to amend CMO-1 to add additional class representatives and lead counsel; review of Drogueria Betances Complaint; argument of motion; respond to Court's appointment of myself and James

Cecchi to meet with and advise the Court re position of plaintiff counsel on potential reorganization of lead counsel and/or settlement committee; negotiate format and protocol for conferences among counsel; convene and conduct meetings of, and communicate with Plaintiffs' counsel regarding those organizational issues; prepare reports to the Court on both issues; present and argue positions of DPP Plaintiffs' counsel to the Court re issues of additional counsel and settlement committee; prepare and argue issues regarding form and substance of Order.

- Participate in preparation and filing of DPP motion for class certification; review of defendant opposition; participation in preparation of and filing of reply.
- Review and participation in preparation of opposition to summary judgment motion.
- Attendance at arguments of motion for class certification and in opposition to summary judgment.
- Attendance at conferences with the Court re settlement with Pfizer.
- Participation in preparation and filing of motion for preliminary approval of partial settlement.

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.

Professional	Position	Hours	Lodestar Historical Rates	Lodestar Current Rates
Peter S. Pearlman	Senior Counsel	1589.10	\$1,182,863.59	\$1,430,190.00
Matthew F. Gately	Partner	17.40	\$10,340.00	\$ 13,050.00
Jeffrey W. Herrmann	Partner	6.50	\$4,735.00	\$ 5,850.00
Audra DePaolo	Partner	.70	\$332.50	\$ 525.00
Kory Ann Ferro	Associate	6.70	\$2,345.00	\$ 3,350.00
Javier Royal	Associate	21.50	\$6,450.00	\$ 10,750.00
Melinda Lugo	Paralegal	.70	\$ 129.50	\$ 157.50
Massiel D. Suarez	Paralegal	1.70	\$ 314.50	\$ 382.50
Alexandria D. Weining	Law Clerk	9.50	\$1,425.00	\$ 1,425.00
Thomas R. Kenny*	Investigator	17.00	\$1,445.00	\$ 1,445.00
Total:		1670.80	\$1,210,380.09	\$1,467,125.00

5. My firm incurred a total of \$9,974.51 in unreimbursed expenses, as set forth in the following table¹:

Expense	Amount
Court reporting/transcription services	\$2,702.72
Filing fees	\$1,910.00
Litigation Fund Contributions	\$0
Postage/FedEx	\$254.28
Telephone	\$145.75
Photocopying	\$206.25
Travel/hotel/meals	\$3,634.24
Legal research and datasets	\$1,121.27
Total	\$9,974.51

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

Executed this 23rd day of April, 2024

/s/Peter S. Pearlman
Peter S. Pearlman

¹ 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.