

EXHIBIT K

**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 JAMES E. CECCHI ON BEHALF OF CARELLA
BYRNE CECCHI OLSTEIN BRODY & AGNELLO, P.C. IN SUPPORT
OF DIRECT PURCHASER PLAINTIFFS MOTION FOR ATTORNEYS'
FEES, REIMBURSEMENT OF EXPENSES AND SERVICE AWARDS
FOR THE NAMED PLAINTIFFS**

I, JAMES E. CECCHI, declares as follows pursuant to 28 U.S.C. § 1746:

1. I am a partner at the law firm of Carella Byrne Cecchi Olstein Brody & Agnello, P.C. I submit this declaration in support of the Direct Purchaser Plaintiffs' Motion for Attorneys' Fees, Reimbursement of Expenses and Service Awards for the Named Plaintiffs. I have personal knowledge of the matters set forth herein based on personal knowledge and the business records of our firm. By making this declaration, I do not intend to waive any attorney-client privilege or applicable work product protections. I also reserve the right to amend this declaration.

2. I have served as Co-Liaison Counsel throughout the long history of this matter. I was involved in all aspects of the case and was one of the principal

architects of the settlement at issue. The majority of my firm's time was spent on settlement related matters.

3. In accordance with our regular practice, all attorneys, paralegals and other support staff at my firm were instructed to keep contemporaneous time records reflecting their time spent on this case. 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 or anticipated work into the future. In accordance with the Time and Expense Order, all hourly rates are reported below at what I estimate to be an average historical billing rate and at current billing rates equal to recent large multi-district matters.¹

Professional	Position	Hours	Lodestar Historical Rates	Lodestar Current Rates
Cecchi, James	Partner	1,199.00	\$1,139,050.00	\$1,558,700.00
Bartlett, Caroline	Partner	5.80	\$4,640.00	\$5,655.00

¹ Former employees are identified with an asterisk.

Bower, Zach	Partner	11.30	\$9,040.00	\$10,735.00
Cooper, Kevin	Partner	5.10	\$2,805.00	\$3,825.00
Ecklund, Donald	Partner	14.40	\$11,520.00	\$11,520.00
Flax, Melissa	Partner	0.60	\$420.00	\$420.00
Taylor, Lindsey*	Partner	745.00	\$619,840.00	\$726,375.00
Gilfillan, David	Partner	4.10	\$3,075.00	\$3,075.00
O'Brien, James	Of Counsel	46.10	\$36,880.00	\$36,880.00
O'Toole, Brian	Associate	14.20	\$9,230.00	\$9,230.00
Petrolle, Audra*	Associate	5.10	\$2,295.00	\$2,295.00
Patel, Chirali*	Associate	9.10	\$3,640.00	\$3,640.00
Falduto, Jeff	Paralegal	4.00	\$900.00	\$900.00
Houser, Nancy	Paralegal	2.00	\$450.00	\$450.00
Rago, Mary Ellen	Paralegal	7.40	\$1,665.00	\$1,665.00
Tempesta, Laura*	Paralegal	0.30	\$67.50	\$67.50
Kaplan, Alison*	Lawclerk	0.90	\$202.50	\$202.50
TOTAL:		2,074.40	\$1,845,720.00	\$2,375,635.00

5. My firm incurred a total of \$67,562.75 in unreimbursed expenses, as set forth in the following table²:

Expense	Amount
Filing fees	\$227.60
McCarter & English (Special Master)	\$963.24
Postage/FedEx	\$87.76
Telephone	\$53.59
Experts/Consulting (Econ One)	\$22,175.00
Travel/hotel/meals	\$1,965.56
Hochberg ADR (Mediation)	\$42,090.00
Total	\$67,562.75

I declare that the foregoing is true and correct.

Executed this 23rd day of April, 2024

/s/ James E. Cecchi, Esq.

² 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.