

EXHIBIT L

**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 JOHN W. BARRETT ON BEHALF OF PLAINTIFF
PROFESSIONAL DRUG COMPANY, INC. IN SUPPORT OF DIRECT
PURCHASER CLASS COUNSEL'S MOTION FOR ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES AND SERVICE AWARDS FOR THE
NAMED PLAINTIFFS**

I, John W. Barrett, subject to the penalties of perjury provided by 18 U.S.C. § 1746, hereby declare as follows:

1. I am an attorney at the law firm of Barrett Law Group, P.A. 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 worked in coordination with other co-counsel for the Direct Purchaser Plaintiffs and worked efficiently on behalf of our representative client Plaintiff Professional Drug Company, Inc., including investigating the claims, attending depositions, contributing to litigation strategy, participating in motion drafting, and assisting in discovery.

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
John (“Don”) Barrett	Partner	63.20	\$79,000.00	\$88,480.00
David McMullan	Partner	41.90	\$24,092.50	\$39,805.00
Brian Herrington	Attorney	2.10	\$1,207.50	\$1,995.00
Richard Barrett	Partner	1.20	\$690.00	\$1,140.00
Katherine Riley	Partner	17.00	\$13,600.00	\$16,150.00
Charles Barrett	Partner	137.80	\$79,235.00	\$130,910.00
Sterling Aldridge	Partner	8.00	\$4,600.00	\$7,600.00
Brandi Hamilton	Attorney	18.80	\$13,160.00	\$16,450.00

¹ Former employees are identified with an asterisk.

Chris Hammett	Legal Assistant	14.30	\$2,145.00	\$3,575.00
Nanci-Taylor Maddux	Paralegal	1.30	\$455.00	\$520.00
Dawn Garrison	Paralegal	31.50	\$4,725.00	\$7,875.00
Total:		337.10	\$222,910.00	\$314,500.00

5. My firm incurred a total of \$14,160.98 in unreimbursed expenses, as set forth in the following table²:

Expense	Amount
Court reporting/transcription services	\$0.00
Filing fees	\$561.00
Litigation Fund Contributions	\$0.00
Professional Fees (experts, investigators, etc.)	\$9,731.39
Postage/FedEx	\$141.74
Telephone	\$71.04
Photocopying	\$2.40
Travel/hotel/meals	\$3,142.55
Legal research and datasets	\$510.86
Total	\$14,160.98

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

Executed this 19th day of April 2024.

/s/ John W. Barrett
 John W. (“Don”) Barrett
 Barrett Law Group, P.A.

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