

EXHIBIT M

**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 DIANNE M. NAST IN SUPPORT OF DIRECT
PURCHASER CLASS COUNSEL’S MOTION FOR AN AWARD OF
ATTORNEYS’ FEES, REIMBURSEMENT OF COSTS AND EXPENSES,
AND CLASS REPRESENTATIVE SERVICE AWARDS**

I, Dianne M. Nast, hereby declare as follows:

1. I am admitted to practice before Courts in the Commonwealth of Pennsylvania and the State of New Jersey; the Eastern District of Pennsylvania; the Courts of Appeals for the Third, Fifth, Sixth, Seventh, Eighth, and Eleventh Circuits; the Supreme Court of the United States; and other various federal district courts. I was actively involved in and oversaw my firm’s participation in this litigation.

2. I am the founder and firm manager of NastLaw LLC (“NastLaw”). I submit this declaration in support of Direct Purchaser Class Plaintiffs’ Motion for an award of Attorneys’ Fees, Reimbursement of Costs and Expenses, and Class Representative Service Awards.

3. During the course of this litigation, my firm has been involved in multiple activities on behalf of the Direct Purchaser Class:

I participated in multiple meetings and planning sessions, including discussions related to case strategy, research projects, pleadings, and responses to pleadings. Also, I or another NastLaw attorney attended status conferences with the Honorable Peter G. Sheridan either in-person or telephonically.

In addition to myself, NastLaw attorneys Erin C. Burns and Michael S. Tarringer, have been directly involved with this litigation.

By way of further example, I and the NastLaw attorneys conducted research and drafted or assisted with drafting the initial class complaint and the consolidated class complaint. Additionally, NastLaw attorneys undertook legal research and assisted with drafting the JPML motion to transfer, the response to the motion to transfer, researched the jurisdiction of the district court during the pendency of appeal, drafted a memorandum summarizing the Third Circuit opinion remanding the claims to the District of New Jersey, assisted with drafted the Rule 26 disclosures, and edited discovery requests. These are just some examples of the work undertaken by NastLaw. A full description of the work performed by NastLaw staff is listed in detail in the monthly fee and expense reports submitted by the firm.

4. 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 NastLaw were instructed to keep contemporaneous time records reflecting their time spent on this case and did so. Also, NastLaw kept books and records concerning the expenses the firm necessarily incurred in the prosecution of this litigation, prepared from receipts and other source material.

5. The schedule below reports the time spent by NastLaw attorneys, paralegals and other support staff from inception until February 7, 2024 (the date that the settlement was executed). NastLaw’s time 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. NastLaw did not employ or use the services of any contract attorneys.¹

Professional	Position	Hours	Lodestar Historical Rates	Lodestar Current Rates
Dianne M. Nast	Managing Shareholder	240.5	\$197,039	\$282,587.50
Erin C. Burns*	Attorney	135.6	\$67,192	\$88,140
Michael S. Tarringer	Attorney	37.3	\$29,392.50	\$34,316
Cathryn Roberts*	Paralegal	41.6	\$6,492	\$7,072
Emily C. Bell*	Paralegal	22.1	\$3,625	\$4,972.50
Total:		477.10	\$303,740.50	\$417,088

¹ Former employees are identified with an asterisk.

6. NastLaw incurred a total of \$5,356.29 in unreimbursed expenses, as set forth in the following table²:

Expense	Amount
Filing fees	\$1,560.00
Postage/FedEx	\$100.22
Telephone	\$78.05
Photocopying	\$1,003.75
Travel/hotel/meals	\$1,935.46
Legal research and datasets	\$678.81
Total	\$5,356.29

I declare that the foregoing is true and correct. Executed this 19th day of April 2024, at Philadelphia, Pennsylvania.

/s/ Dianne M. Nast
Dianne M. Nast

*Co-Counsel for DPP Plaintiff Stephan L.
LaFrance Holdings, Inc. and Stephen L.
LaFrance Pharmacy, Inc. d/b/a SAJ
Distributors*

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.