

EXHIBIT O

**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 MICHAEL L. ROBERTS ON BEHALF OF ROBERTS
LAW FIRM US, PC IN SUPPORT OF DIRECT PURCHASER CLASS
COUNSEL’S MOTION FOR ATTORNEYS’ FEES, REIMBURSEMENT OF
EXPENSES AND SERVICE AWARDS FOR THE NAMED PLAINTIFFS**

I, Michael L. Roberts, subject to the penalties of perjury provided by 18
U.S.C. § 1746, hereby declare as follows:

1. I am Managing Partner of Roberts Law Firm US, PC. 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:

- Completed factual and legal research and developed strategy
supporting the claims filed on behalf of the Direct Purchaser
Class;
- Participated in the drafting of the complaints filed on behalf of
the Direct Purchaser Class;

- Collected, analyzed and produced plaintiff Stephen L. LaFrance Holdings, Inc.’s (“LaFrance”) documents and data in response to defendants’ requests for production;
- Prepared responses on behalf of LaFrance to defendants’ written discovery requests;
- Prepared for and defended the deposition of LaFrance’s corporate representative;
- Analyzed and edited pleadings and settlement documents.

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
Burton, April	Paralegal	63.4	\$10,778.00	\$10,778.00
DeLoach, Sarah	Partner	3.5	\$1,925.00	\$2,625.00
Halbert, Karen	Partner	173.8	\$126,003.00	\$165,110.00
Isclaw, Angelicia	Paralegal	7.3	\$1,241.00	\$1,241.00
Josephson, Debra	Partner	224.7	\$152,317.00	\$170,772.00
Law, Jana*	Partner	8.9	\$3,854.50	\$5,384.50
Olson, Will*	Associate	13.0	\$6,175.00	\$6,175.00
Roberts, Mike	Partner	38.3	\$31,707.00	\$39,832.00
Smith, Stephanie	Partner	239.8	\$159,972.00	\$215,820.00
Wang, Rita	Partner	5.3	\$4,081.00	\$4,346.00
Wells, Jennifer*	Associate	.1	\$41.00	\$41.00
Total:		778.10	\$498,094.50	\$622,124.50

5. My firm incurred a total of \$30,586.68 in unreimbursed expenses, as set forth in the following table²:

¹ Former employees are identified with an asterisk.

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

Expense	Amount
Court reporting/transcription services	
Doc Data Vendor	\$25,205.10
Filing fees	\$1,330.00
Litigation Fund Contributions	
Postage/FedEx	
Telephone	
Photocopying	
Travel/hotel/meals	\$2,922.08
Legal research and datasets	\$1,129.50
Total	\$30,586.68

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

Executed this 18th day of April, 2024

/s/Michael L. Roberts

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.