

EXHIBIT C

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE OPANA ER ANTITRUST LITIGATION	MDL No. 2580
THIS DOCUMENT RELATES TO: All Actions	Lead Case No. 14-cv-10150 Hon. Harry D. Leinenweber

**DECLARATION OF DAVID F. SORENSEN ON BEHALF OF
BERGER MONTAGUE PC IN SUPPORT OF CLASS COUNSEL’S MOTION FOR
ATTORNEYS’ FEES, REIMBURSEMENT OF EXPENSES AND SERVICE AWARDS
FOR THE NAMED PLAINTIFFS**

David F. Sorensen, subject to the penalties of perjury provided by 18 U.S.C. § 1746,
does hereby declare as follows:

1. I am an Executive Shareholder in the law firm Berger Montague PC, attorneys for the Direct Purchaser Class Plaintiffs and Co-Lead Counsel for the certified Direct Purchaser Class in the above-captioned case. I submit this declaration in support of Direct Purchaser Plaintiffs’ Motion for Attorneys’ Fees, Reimbursement of Expenses, and Service Awards for the Named Plaintiffs in connection with the settlement with Defendant Impax Laboratories, Inc.

2. During the course of this litigation, my firm has been involved in various activities on behalf of the Direct Purchaser Class. Chief among those activities were:

- Investigating the case and helping to prepare the first complaint in this matter;
- Drafting sections of Plaintiffs’ opposition to Defendants’ motion to dismiss;
- Leading discovery efforts on behalf of all Plaintiffs, including extensive negotiations with Defendants and third parties and motion practice before the

Court;

- Reviewing, analyzing, and digesting hundreds of thousands of pages of documents and data produced by Defendants (and third parties), and participating in all aspects of discovery, including taking and defending fact and expert depositions;
- Working with economic, scientific, industry and regulatory experts concerning all aspects of the case;
- Drafting papers in support of the motion for class certification and responding to Defendants' opposition papers;
- Participating in drafting various briefs and related filings, including: the opposition to Defendants' motions for summary judgment; oppositions to *Daubert* motions; affirmative *Daubert* motions; affirmative motions *in limine*; oppositions to motions *in limine*; and various pretrial submissions, including jury instructions;
- Preparing for and participating in trial, including making an opening statement and closing argument, direct examination of expert witnesses; presentation of testimony by video, including negotiations and argument concerning same, various in-trial arguments, and jury instruction negotiations and argument;
- Participating in settlement discussions with Impax.

3. All attorneys, paralegals and staff at my firm were instructed to keep contemporaneous time records reflecting their time spent on this case and did so.

4. The schedule below reports the time spent by my firm's attorneys, paralegals, and staff in this case from inception until July 4, 2022 and time thereafter related to this settlement only. This does not include time relating to this motion for fees or for post-trial briefing. All hourly rates are as of July 1, 2022, unless a person had left the firm previously, in which case the rate is the person's rate as of the time of departure from the firm (* designates former employee).

Professional's Name	Position/Status	Total Hours	Hourly Rate as of July 1, 2022	Total Lodestar
Sorensen, David	Executive Shareholder	744.8	1100	\$819,280.00
Coslett, Caitlin	Shareholder	1,025.10	750	\$768,825.00
Curley, Andrew	Shareholder	7,324.10	740	\$5,419,834.00
Lambiras, Jon	Shareholder	470.6	740	\$348,244.00
Twersky, Martin	Shareholder	0.4	890	\$356.00
Parker, Phyllis	Shareholder	261.3	740	\$193,362.00
Urban, Nick	Shareholder *	28.1	640	\$17,984.00
Caplan, Zachary	Shareholder *	747.7	640	\$478,528.00
Langer, David	Senior Counsel	240.4	695	\$167,078.00
Klein, Joseph	Senior Counsel	1,412.50	675	\$953,437.50
Schwartz, Richard	Senior Counsel	3,869.70	660	\$2,554,002.00
Simons, Daniel	Senior Counsel *	94.6	660	\$62,436.00
McGrath, Julia	Associate	301.9	530	\$160,007.00
Wallin, Michaela	Associate	715.8	570	\$408,006.00
Suter, Mark	Associate	3.8	530	\$2,014.00
Jacobs, Najah	Associate	6.2	510	\$3,162.00
Twersky, Yechiel	Associate	69.3	610	\$42,273.00
Pritchard, Haley	Associate	22.4	490	\$10,976.00
Chaudhury, Aurelia	Associate *	6.7	470	\$3,149.00
Parron, John	Associate *	26.4	520	\$13,728.00
Sauder, Karissa	Associate *	204.1	450	\$91,845.00
Wilson, Andrea	Contract Attorney	16.3	425	\$6,927.50
McAllister, D'yal	Contract Attorney	158.6	345	\$54,717.00
Boman, Laurel	Contract Attorney	4.6	230	\$1,058.00
Weisblatt, Roseann	Contract Attorney	483.4	490	\$236,866.00
Choe, Caroline	Paralegal	204.1	380	\$77,558.00
Werwinski, Diane	Paralegal	1,651.90	390	\$644,241.00
York, Mary	Paralegal	0.8	400	\$320.00
Cook, James	Paralegal	1.5	275	\$412.50
Hibray, Jean	Paralegal	1.3	370	\$481.00
Leo, Susan	Paralegal	2.9	340	\$986.00
Arteaga, Alexandra	Paralegal *	100.5	330	\$33,165.00
Shappell, David	Paralegal *	32	310	\$9,920.00
Kerr, Joseph	Paralegal *	122.5	305	\$37,362.50
Stein, Mark	Paralegal *	3.5	345	\$1,207.50
Frohbergh, Patricia	Paralegal *	232.7	390	\$90,753.00
Matteo, Shawn.	Paralegal *	27	330	\$8,910.00
Rajendran, Arun	Other Staff *	0.4	43	\$17.20
Fox, Barry	Other Staff *	3.5	83.49	\$292.22
McCollum, Sandy	Other Staff *	3.8	57.5	\$218.50
TOTAL		20,627.20		\$13,723,939.42

5. My firm has also incurred a total of \$829,057.98 (as of July 4, 2022) in unreimbursed expenses in connection with the prosecution of the litigation. These expenses were reasonably and necessarily incurred in connection with this litigation and include:

Expense	Amount
Court reporter	-----
Document database	\$38,137.60
Filing fees/court costs	\$1,705.25
Litigation fund assessment	\$565,000.00
Postage/air express/messengers	\$2,228.62
Reproduction costs (outside vendor)	\$37,533.81
Research and datasets	\$37,212.03
Telephone/teleconference/facsimile	\$6,315.11
Travel/hotel/meals	\$140,925.56
Total:	\$829,057.98

6. The expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, receipts and other source material and accurately record the expenses incurred.

7. Pursuant to 28 U.S.C. § 1746, I declare under the penalties of perjury that the foregoing is true and correct.

Executed this 19th day of September, 2022.



David F. Sorensen