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May 16, 2024

VIA ECF

Honorable Peter G. Sheridan, U.S.D.J.
United States District Court, District of New Jersey
Clarkson S. Fisher Federal Building & U.S. Courthouse
402 E. State Street
Trenton, New Jersey 08608

**Re: In re Lipitor Antitrust Litigation
MDL No. 2332
Civil Action No.: 3:12-cv-02389-PGS-JBD**

Dear Judge Sheridan:

I write to provide the Court with a supplemental declaration from Gregory T. Arnold, of Hagens Berman Sobol Shapiro LLP (“HBSS”) in support of Class Counsel’s Motion for an Award of Attorneys’ Fees, Reimbursement of Expenses, and Service Awards for the Class Representatives. The supplemental Arnold declaration is attached and corrects some of the historical lodestar information contained in the original Arnold declaration previously docketed at ECF No. 1397-4.

The only change to the HBSS lodestar calculation is a correction to the HBSS lodestar calculations at historical billing rates. This correction in turn changes the total Class Counsel lodestar based on historical billing rates, reflected in the chart at paragraph 121 of my April 24, 2024 Declaration (ECF No. 1397-2), to \$26,153,398.21. Accordingly, paragraph 128 of my April 24, 2024 Declaration should be revised to read: “Under historical billing rates, Class Counsel’s lodestar is \$26,153,398.21, yielding a multiplier of 1.19.” Similarly, the Memorandum in Support of Class Counsel’s Motion for Attorneys’ Fees, Reimbursement of Expenses and Service Awards for the Named Plaintiffs (ECF No. 1397-1) should be corrected to read that the multiplier using historical billing rates is 1.19. *See id.* at 5, 28.

Respectfully submitted,

s/Peter S. Pearlman

Peter S. Pearlman

PSP:sl

Encl.

cc: All Counsel Via ECF