



I, David O'Connell, declare as follows:

1. I am a marketing analyst for a pharmaceutical company and a named Plaintiff in the above-captioned case (the "Litigation"). I respectfully submit this declaration in support of: (a) Plaintiffs' motion for final approval of the \$97,500,000 settlement (the "Settlement") reached between the National Shopmen Pension Fund (on behalf of itself and Class Members) and the defendants; (b) Lead Counsel Robbins Geller Rudman & Dowd LLP's ("Robbins Geller") motion for an award of attorneys' fees and expenses; and (c) my request for an award of \$1,500.00 for my time incurred in representing the Class.

2. In my capacity as a Plaintiff, I reviewed pleadings and briefs and regularly communicated with Robbins Geller concerning the status of the Litigation. I also identified and provided relevant information during the discovery process. Indeed, throughout the Litigation, I stayed informed regarding case developments and procedural matters, such as discovery and class certification.

3. While I recognize that any determination of attorneys' fees is left to the Court, I believe that Robbins Geller's request for attorneys' fees of 30% of the Settlement Amount and expenses not to exceed \$950,000, plus interest on both amounts, is fair and reasonable, as this Settlement would not have been possible without their diligent and aggressive prosecutorial efforts.

4. I understand that the Court may award reasonable costs and expenses to representatives serving on behalf of the Class, directly relating to the representation of the Class. I believe a reasonable and modest rate for the time I spent on this Litigation is \$75 per hour based on my current compensation. I am requesting the total amount of \$1,500, based on the approximately 20 hours of my time spent participating in this Litigation as a named Plaintiff. As noted above, I communicated with attorneys from Robbins Geller concerning the Litigation strategy in connection

with discovery and class certification, reviewed relevant pleadings, and identified and provided relevant information during the discovery process.

5. I respectfully request that the Court grant final approval of the Settlement, approve Robbins Geller's motion for an award of attorneys' fees and expenses, and award me \$1,500.00 for my time expended in serving as a named Plaintiff in the Litigation.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed this 20<sup>th</sup> day of October, 2017, in Lansdowne, Pennsylvania.

  
DAVID O'CONNELL

CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2017, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 25, 2017.

s/ Robert R. Henssler Jr.

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#### **Manual Notice List**

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- (No manual recipients)