

# EXHIBIT K

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

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

**DECLARATION OF JOSEPH M. VANEK ON BEHALF OF  
SPERLING & SLATER, PC IN SUPPORT OF CLASS COUNSEL’S MOTION FOR  
ATTORNEYS’ FEES, REIMBURSEMENT OF EXPENSES AND SERVICE AWARDS  
FOR THE NAMED PLAINTIFFS**

I, Joseph M. Vanek, subject to the penalties of perjury provided by 18 U.S.C. § 1746, does hereby declare as follows:

1. I am a member of the bar of the State of Illinois and the Commonwealth of Massachusetts. I am a Partner at Sperling & Slater, P.C., and was the managing partner of Vanek, Vickers & Masini, P.C.,<sup>1</sup> counsel for the direct purchaser class in this matter. I provide this declaration in support of Direct Purchaser Plaintiffs’ Motion for Attorneys’ Fees, Reimbursement of Expenses, and Service Awards for the Named Plaintiffs.

2. During the course of this litigation, Sperling & Slater and Vanek, Vickers & Masini have been involved in various activities on behalf of the Direct Purchaser Class. Chief among those activities were:

- Investigating the background information and preparation of the complaint and

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<sup>1</sup> On January 1, 2019 the antitrust attorneys with Vanek Vickers & Masini, P.C., joined Sperling & Slater, P.C. and, as a consequence, the time and expenses submitted for Sperling & Slater, P.C. include the time and expenses incurred by Vanek, Vickers & Masini, P.C. prior to the merger.

case timeline.

- Preparing the ESI protocol.
- Participating in Defendant document review and exhibit identification in connection with the efforts of the cross-plaintiff causation team.
- Assist in drafting Rule 26 disclosures.
- Responding to Rule 34 Requests for Production directed to class representative Meijer.
- Responded to Interrogatories directed to class representative Meijer.
- Preparing for and defending class representative Meijer to testify at deposition.
- Preparing for trial, including preparation of Meijer to testify.

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 and post-trial briefing. All hourly rates for Sperling & Slater, P.C. 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). The billing rates for Vanek, Vickers & Masini, P.C. are current through the date of the merger on January 1, 2019.

<b>Vanek, Vickers &amp; Masini, P.C.</b>				
<b>Professional's Name</b>	<b>Position/Status</b>	<b>Total Hours</b>	<b>Hourly Rate as of January 1, 2019</b>	<b>Total Lodestar</b>
Joseph Vanek	Partner	60.7	\$ 700.00	\$45,5640.00
David Germaine	Partner	153.20	\$ 645.00	\$98,814.00
John Bjork	Partner	352.30	\$ 425.00	\$149,727.50
Alberto Rodriguez	Partner	6.90	\$ 475.00	\$3,277.50

Martin Amaro	Associate	107.80	\$ 475.00	\$51,205.00
Jeffrey Moran	Partner	10.10	\$ 645.00	\$6,514.50
Diane Fan	Paralegal	21.20	\$ 200.00	\$4,240.00
Chelsey Sheffer	Paralegal	15.60	\$ 200.00	\$3,120.00
<b>TOTAL</b>		<b>727.8</b>		<b>\$362,538.50</b>
<b>Sperling &amp; Slater, P.C.</b>				
<b>Professional's Name</b>	<b>Position/Status</b>	<b>Total Hours</b>	<b>Hourly Rate as of July 1, 2022</b>	<b>Total Lodestar</b>
Joseph Vanek	Partner	37.00	\$ 995.00	\$36,008.00
David Germaine	Partner	41.60	\$ 785.00	\$32,284.00
John Bjork	Partner	22.90	\$ 695.00	\$14,871.50
Alberto Rodriguez	Partner	3.20	\$ 695.00	\$2,224.00
Martin Amaro	Associate	9.10	\$ 585.00	\$5,223.50
Martin Sinclair	Associate	1.80	\$ 495.00	\$891.00
Sandra E. Raitt	Staff Attorney	26.60	\$ 215.00	\$5,719.00
Diane Fan	Paralegal	34.3	\$ 345.00	\$11,543.50
<b>TOTAL</b>		<b>176.5</b>		<b>\$108,764.50</b>

5. Vanek, Vickers & Masini, P.C. and Sperling & Slater, P.C. also incurred a total of \$43,473.64 (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:

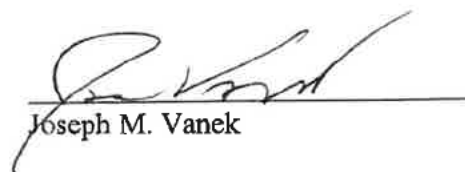
<b>Vanek, Vickers &amp; Masini, P.C.</b>	
<b>Expense</b>	<b>Amount</b>
Court reporter	\$969.10
Document database	\$8520.00
Postage/air express/messengers	\$108.07
Reproduction costs (outside vendor)	\$238.40
Research and datasets	\$109.36
Travel/hotel/meals	\$1,299.49
<b>Total:</b>	<b>\$11,244.42</b>
<b>Sperling &amp; Slater, P.C.</b>	
<b>Expense</b>	<b>Amount</b>
Travel/hotel/meals	\$845.93

Consulting/Expert fees	\$1,650.00
Delivery Service	\$23.16
Online Research	\$211.09
Document database	\$29,499.04
<b>Total:</b>	<b>\$32,229.22</b>

6. The expenses incurred in this action are also 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 14<sup>th</sup> day of September, 2022.

  
Joseph M. Vanek