

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re WELLBUTRIN XL)	
ANTITRUST LITIGATION)	Civil Action No.: 2:08-cv-2433
THIS DOCUMENT RELATES TO:)	
INDIRECT PURCHASER ACTIONS)	Honorable Gerald A. McHugh

**DECLARATION OF KENNETH A. WEXLER IN SUPPORT OF INDIRECT
PURCHASER PLAINTIFFS’ MOTION FOR DISTRIBUTION OF THE NET
SETTLEMENT FUND AND APPLICATION FOR AWARD OF FEES FOR
SETTLEMENT ADMINISTRATION**

I, Kenneth A. Wexler, hereby declare under 28 U.S.C § 1746, that:

1. I am an attorney in good standing, duly licensed and admitted to the Bar of the State of Illinois. I am a shareholder in the law firm of Wexler Wallace LLP.

2. The Court appointed my firm as Co-Lead Class Counsel in its Class Certification Order entered August 15, 2011. Dkt. No. 354.

3. I respectfully submit this Declaration in support of my firm’s request for attorneys’ fees incurred in connection with administering the February 8, 2013 Valeant Class Settlement (“Settlement” or “Valeant Settlement”) between Plaintiffs, individually and on behalf of the Indirect Purchaser Class (“Class”), and Valeant Pharmaceuticals International, Inc. f/k/a Biovail Corp., Biovail Laboratories, Inc., and Valeant International Bermuda f/k/a Valeant International (Barbados) SRL f/k/a Biovail Laboratories International SRL (collectively, “Valeant”), as set forth in Plaintiffs’ Motion for Distribution of the Net Settlement Fund and Application for Award of Fees for Settlement Administration (“Distribution Motion”). The following statements are true to the best of my personal knowledge, information and belief based on the books and records of Wexler Wallace LLP.

4. The Court previously awarded Class Counsel's motion for attorney's fees and expenses in the Court's July 22, 2013 Final Approval Order. Dkt. No. 473. The Court-approved Notice of Class Certification and Partial Proposed Biovail Settlement ("Notice") provides that Class Counsel may "make a further request for additional attorney's fees and expenses incurred as a result of administration of the Valeant Settlement. All awards for attorneys' fees and expenses shall be paid from the Valeant Settlement Fund after the Court approves them." Dkt. No. 454, Ex. B at ¶ 22; *see also* Preliminary Approval Order, Dkt. No. 456.

5. Accordingly, Class Counsel respectfully moves for an award of additional attorney's fees incurred in connection with the administration of the Valeant Settlement. This request includes the time that Class Counsel spent working with the Court-Appointed Claims Administrator, ("CASS"), to review submitted consumer and TPP claim documentation and CASS's administrative claim determinations, where necessary, as well as preparing Indirect Purchaser Plaintiffs' Distribution Motion.

6. The schedules below are summaries reflecting the amount of time spent by the attorneys at Wexler Wallace LLP on matters related to the administration of the Valeant Settlement, and lodestar calculations based on Wexler Wallace LLP's current hourly billing rates. These schedules were prepared based upon time records maintained by Wexler Wallace LLP. Wexler Wallace LLP is not requesting legal fees incurred in connection with preparing this request.

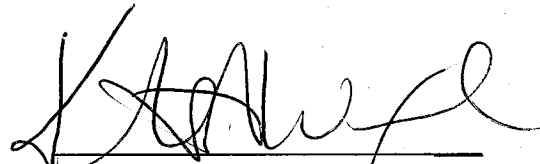
Timekeeper	Position	Billed Hours	Current Rate	Total Fee
Kenneth A. Wexler	Partner	0.7	750.00	\$525.00
Amber M. Nesbitt	Partner	0.5	575.00	\$287.50
Amy Sayre	Paralegal	0.10	275.00	\$27.50
TOTAL		1.3		\$840.00

7. The total time for which Wexler Wallace LLP is requesting an award of legal fees for administration of the Valeant Settlement is 1.3 hours. See ¶ 6 above. The total lodestar value of these professional services is \$840.00. *Id.*

8. Plaintiffs will post this Declaration and Supplemental Motion on the Settlement website, www.WXLclassaction.com.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on December 11, 2017
Chicago, Illinois



KENNETH A. WEXLER