

EXHIBIT G

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

In re WELLBUTRIN XL
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

INDIRECT PURCHASER ACTIONS

)
)
) Civil Action No.: 2:08-cv-2433
)

) Honorable Mary A. McLaughlin
)
)

**DECLARATION OF CHRISTOPHER MAYO IN SUPPORT OF
PLAINTIFFS' MOTIONS FOR FINAL APPROVAL OF THE
PROPOSED SETTLEMENT AND FOR APPROVAL OF AN AWARD
OF ATTORNEYS' FEES AND COSTS AND INCENTIVE AWARDS**

I, Christopher Mayo, declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am over 21 years of age, am of sound mind and body, and am otherwise competent to testify. I have personal knowledge of the facts stated in this declaration, and, if called as a witness, I could and would testify competently to them.

2. Plumbers and Pipefitters Local 572 Health and Welfare Fund ("Local 572") is one of the named plaintiffs in the above-titled action. Local 572 is an "employee welfare benefit plan" and an "employee benefit plan" within the meaning of the Employee Retirement Income Security Act ("ERISA"), 29 U.S.C. § 1002(1) and (3). As such, Local 572 is a legal entity entitled to bring suit in its own name pursuant to 29 U.S.C. § 1132(d)(1).

3. Since July 2002, I have served as the Fund Administrator of Local 572. In this capacity, I have handled day-to-day operations for the Board of Trustees, including but not limited to pension distributions, payroll, reports, and tax filings.

4. In the course of this litigation, Local 572 has devoted significant time and resources to fulfilling its role as a named plaintiff and class representative.

5. Local 572 participated in the discovery process by searching for documents, reviewing them, and producing them to the defendants.

6. Local 572 coordinated with both its current and former pharmacy benefit managers (“PBMs”) to obtain Local 572’s claims data from the relevant period and answers to questions regarding that data.

7. From time to time, I answered questions posed by class counsel regarding Local 572 and its payments for Wellbutrin XL, bupropion, and other antidepressants.

8. I submitted a declaration explaining Local 572’s relationship with its third-party administrator.

9. I personally gave two separate, multi-hour depositions on behalf of Local 572 as its designated witness under Fed. R. Civ. P. 30(b)(6). These occurred on March 2 and November 30, 2010. Before each of these depositions, I spent time preparing with class counsel and reviewing relevant information. In addition, I reviewed the March 2 deposition transcript and prepared a detailed errata sheet.

10. I regularly monitored the progress of the litigation, reviewing updates from class counsel.

11. I was provided with pertinent information about the settlement negotiations and approved class counsel’s execution of the February 7, 2013, Settlement Agreement.

12. I believe the settlement is an excellent result for class members in light of the litigation risks. I have been extremely satisfied with the high quality of work, diligence, and professionalism of Branstetter, Stranch & Jennings, PLLC, and other class counsel in pursuing the claims in this case.

13. I understand that class counsel are requesting incentive awards totaling \$60,000, to be split among the class representatives for their efforts in representing the class. I believe these awards are appropriate, given the substantial resources that Local 572 devoted to this litigation over several years and the results obtained.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 14, 2013



Christopher Mayo