

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HARTIG DRUG COMPANY INC.,)	
)	
Plaintiff,)	
v.)	
)	C.A. No. 14-719-JFB-SRF
SENJU PHARMACEUTICAL CO. LTD.,)	
KYORIN PHARMACEUTICAL CO., LTD.,)	
AND ALLERGAN, INC.,)	
)	
Defendants.)	

**DECLARATION OF FRANK LLP IN SUPPORT OF PLAINTIFF’S MOTION FOR AN
AWARD OF ATTORNEYS’ FEES AND LITIGATION EXPENSES**

I, Gregory A. Frank, declare as follows:

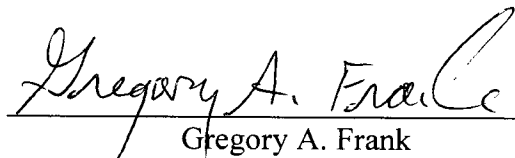
1. I am a partner with Frank LLP. I submit this declaration in support of Plaintiff’s motion for an award of attorneys’ fees and expenses in connection with the services rendered, and costs and expenses incurred, in *Hartig Drug Co. Inc. v. Senju Pharm. Co.* (the “Action”).

2. For the period starting from the Action’s inception through and including July 31, 2018, the total number of hours spent by my firm during this period of time was **383.72**, with a corresponding lodestar of **\$ 278,022.50** based on current hourly rates. In connection with representing the Plaintiff in the Action my firm did the following: drafted the complaint, kept the Plaintiff abreast of the litigation, drafted responses to the defendants’ motions to dismiss, litigated the motions to dismiss to a successful reversal in the Third Circuit, and successfully presented the evidence and damages estimates to defendants and a mediator, which resulted in a settlement agreement. The lodestar amount was performed by attorneys and professional staff at my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm are the usual and customary hourly rates charged by my firm in similar matters.

3. My firm has incurred a total of \$ **4,422.71** in unreimbursed costs and expenses in connection with the prosecution of the Action from inception through and including July 31, 2018. These costs are reflected on the books and records of my firm. They were incurred on behalf of Plaintiff by my firm and have not been reimbursed.

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

Executed this 25th day of September, 2018, in New York, NY.



Gregory A. Frank