

Exhibit 8

**Declaration of Marc Kurzman in Support of
Lead Counsel's Motion for Awards of Attorneys'
Fees and Litigation Expenses, Filed on Behalf of
Carmody Torrance Sandak & Hennessey LLP**

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

IN RE TEVA SECURITIES LITIGATION	:	No. 3:17-cv-00558 (SRU)
	:	
THIS DOCUMENT RELATES TO:	:	All Class Actions
	:	

**DECLARATION OF MARC KURZMAN IN SUPPORT OF LEAD COUNSEL’S
MOTION FOR AWARDS OF ATTORNEYS’ FEES AND LITIGATION EXPENSES,
FILED ON BEHALF OF CARMODY TORRANCE SANDAK & HENNESSEY LLP**

I, Marc Kurzman, hereby declare pursuant to Section 1746 of Title 28 of the United States Code as follows:

1. I am an attorney admitted to practice in this Court and a Partner of Carmody Torrance Sandak & Hennessey LLP (“Carmody”). I have personal knowledge of the matters set forth herein.¹

2. I respectfully submit this declaration in support of Bleichmar Fonti & Auld LLP’s (“Lead Counsel’s”) motion for awards of attorneys’ fees and litigation expenses to describe the work performed, and expenses incurred, by Carmody in connection with prosecuting the above-captioned action (the “Action”). My firm served as Class Liaison Counsel and as local counsel for Class Representatives Ontario Teachers’ Pension Plan Board and Anchorage Police & Fire Retirement System (together, “Class Representatives”) in the Action.

3. Attached hereto as Exhibit A is Carmody’s firm resume for its litigation practice. Carmody has been in existence for over 100 years and has extensive state and federal litigation experience, including in antitrust and securities cases.

¹ Capitalized terms not defined herein have the meanings specified in the Stipulation of Settlement, dated January 18, 2022 (ECF 919-2).

4. Carmody worked closely with Lead Counsel and was involved in this Action from the time it was transferred to this Court in April 2017. Our work included: (a) attending each hearing, (b) advising on strategy, including issues of local practice, (c) reviewing and revising pleadings, motion papers, and other submissions, (d) legal research and discovery analysis, (e) negotiating with the Department of Justice, (f) working to address Defendants' extensive discovery requests, including discovery sought from third parties, particularly in early 2021, and (g) actively participating in the parties' mediation efforts, including strategic advice related to complex insurance issues.

5. Attached hereto as Exhibit B is a list of the Carmody attorneys and staff whose time devoted to the Action is being submitted in support of Lead Counsel's motion, with information about each individual's qualifications, experience, and role in the Action.

6. Exhibit C is a schedule summarizing the amount of time spent by each of the attorneys and professional support staff identified in Exhibit B from the Action's inception through and including April 14, 2022, the rates applicable to each individual, and a lodestar calculation for each individual. This schedule was prepared from contemporaneous daily time records prepared and maintained by Carmody in the ordinary course. I reviewed these time records to confirm their accuracy and the necessity for, and reasonableness of, the time committed to the Action. As a result of this review, reductions were made in the exercise of billing judgment. In addition, all time expended in preparing the application for fees and expenses has been excluded.

7. Following this review and the adjustments made, as set forth in Exhibit C, Carmody devoted 1,501.70 hours to prosecuting this Action. Carmody's total lodestar is \$680,678.50. I believe that the time reflected in Carmody's lodestar calculation, as set forth herein, is reasonable

in amount and was necessary for the effective and efficient prosecution and resolution of the Action.

8. As reflected in Exhibit C, as of 2022 the hourly rates for Carmody attorneys and professional support staff range from \$225 to \$575. In calculating the lodestar, current rates are used for current personnel; for attorneys and professional support staff who are no longer employed by Carmody, the hourly rate used for calculation of the lodestar is the hourly rate for such employee in his or her final year of employment by Carmody.

9. Carmody's rates are the usual and customary rates set by Carmody for each individual, and are the same rates that the firm typically charges clients on a non-contingent basis. Different timekeepers within the same employment category (*e.g.*, partner, associate) may have different rates depending on their respective years of experience, years at the firm, years in current position, relevant experience, relevant expertise, or other factors.

10. Exhibit D provides a summary by category of the expenses Carmody incurred in connection with the prosecution of this Action, totaling \$4,737.82. The information provided in Exhibit D is based on information maintained contemporaneously and in the ordinary course by my firm, including receipts, invoices, expense vouchers, check records, and similar documents. In preparing this declaration and Exhibit D, I have reviewed these records to confirm the accuracy of the expenses incurred, as well as the reasonableness of and necessity for those expenses.

11. I believe that Exhibit D is an accurate record of the expenses incurred by my firm, and that these expenses were fair and reasonable and were necessary for the efficient and effective prosecution of this Action. Further, these expenses are all of a type that my firm would typically bill to a fee-paying client.

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

Dated: Stamford, Connecticut
April 27, 2022

By: /s/ Marc Kurzman
Marc Kurzman

EXHIBIT A

In re Teva Securities Litigation, No. 3:17-cv-00558 (SRU)

Carmody Firm Litigation Resume

Litigation Overview

Carmody has one of the most respected and diverse litigation practices in the Northeast. We have extensive experience in litigating intellectual property, antitrust, securities, product liability, real estate, health care, employment, environmental issues, construction, workout and creditors' rights, insurance, securities and contract matters.

Our Litigation team is led by prominent and skilled trial lawyers and comprises litigators that have been inducted as fellows of the prestigious American College of Trial Lawyers, certified as trial specialists by the National Board of Trial Advocacy, and have served as presidents of such groups as the Connecticut Defense Lawyers Association and the Connecticut Trial Lawyers Association.

Commercial Litigation

Carmody regularly represents Fortune 500 companies, mid-sized, and family businesses in all types of commercial litigation. We take special pride in our successful work in high-stakes, bet-the-company lawsuits. We also counsel business clients as to potential claim exposure and prevention and legal developments affecting their businesses.

We have successfully represented numerous clients in diverse matters involving:

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| <ul style="list-style-type: none"> ▪ Contract disputes ▪ Corporate split-ups ▪ Distributorship and franchise disputes ▪ Business fraud claims ▪ Securities litigation ▪ Criminal and grand jury matters relating to commercial issues | <ul style="list-style-type: none"> ▪ Insurance coverage disputes ▪ Commercial landlord and tenant disputes ▪ Claims of constructive trust ▪ Investor litigation ▪ Antitrust litigation ▪ Partnership and closely held business disputes |
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Federal Court Experience

We regularly appear in the federal courts, not simply in the District of Connecticut and the Second Circuit, but in the Southern and Eastern Districts of New York as well as in cases pending in the Eastern District of Pennsylvania, the Eastern District of Virginia and the Middle District of Florida. Our litigators regularly try civil and criminal cases to juries and to the bench. We most often appear as lead counsel in these cases in the District of Connecticut but will appear as local counsel as well where the client has trusted out-of-state counsel who appears pro hac vice.

A few of the areas of law our lawyers have litigated in federal courts follow.

Antitrust Litigation

Our partners have been involved in a number of federal and state antitrust claims, both as lead and local counsel. Carmody lawyers have guided clients through government subpoenas in the milk, road paving, automobile parts, pipe lining and sundry other industries. When the government or private parties have



sued, we have defended clients against price-fixing claims, Robinson Pattman Act claims, and tying claims in federal courts throughout the country. The suits have ranged in size from representing a state claim for bid rigging in the school lunch program to defense of the lead defendant against criminal and civil claims of engaging in a worldwide price fixing scheme in the Nitrile Butadiene Rubber (NBR) industry, that included market players from Mexico and Korea. In one circumstance, we were able to have our client obtain a substantial reduction in sentence by becoming an early co-operator in the investigation and went on to defend the client civilly in the class actions which followed. Within the last several months one of our partners has helped an international services firm headquartered in Asia to respond to a subpoena in the DOJ's latest initiative, stamping out "no poach" agreements. We have also obtained civil judgments in our clients' favor for opponents' violations of the antitrust laws.

Corporate Battles

Many of our cases involve defending the rights of corporate owners against the misdeeds of the officers, directors and managers who owe a duty to operate the company for the benefit of the owners. Infighting within corporations takes many forms. We have battled for minority owners in partnerships, limited partnerships, limited liability companies and corporations. Because Delaware courts have a well-deserved reputation for prompt adjudication of claims, we have handled a number of matters in the Chancery Court, assisted by capable local counsel. In the all too familiar world in which investors have been misled by false representations to make an investment, whether by purchasing stock or similar ownership interest, we have represented the defrauded investor. We also have defended managers of companies against minority shareholder claims brought strategically to leverage management out of the company. We have on occasion represented broker/dealers and fund managers in suits by unhappy investors.

Government Investigations/White Collar Criminal

Two of our partners joined the firm with an extensive resume in criminal prosecution and defense. We regularly respond to government subpoenas, which are often the prelude to a criminal target letter or an indictment. Even more routinely, they lead to claims by the government of fraud and abuse by the company or person receiving the subpoena. Because they have interacted so often with prosecuting

authorities, our partners are usually able to satisfy the government that its suspicions may have been unjustified. In several circumstances, our first interaction with the prosecution included a threat that an indictment was imminent; but after months of working with the government and exchanging information, the government has retracted its target letter, a rare event in government prosecutions. We have handled the response to countless investigations by the various Offices of Inspector General who are charged with assuring that the government is not defrauded. These include Department of Defense, Amtrak, Small Business Administration, Department of the Treasury and Internal Revenue Service. In some cases, the government remains unsatisfied with the response of the client and initiates either an indictment or a civil suit. We have still been able post-complaint to defend our client's interests and settle the cases on terms that the client finds acceptable. Our most demanding case involved the investigation of two multi-national construction companies who completed a \$500 million capital infrastructure project for a government agency, which alleged fraud in the cost overruns which were actually the fault of mismanagement by Agency employees. The case involved investigators throughout the United States and in London with



proceedings occurring over five years domestically and internationally. The case was resolved entirely to the client's satisfaction.

Intellectual Property Litigation

When it comes to IP, the best prevention is broad protection. However, there are times when it is necessary to enforce and defend your IP rights. If that need arises, Carmody is ready to assist.

Our Intellectual Property Litigation Group is comprised of experienced and talented trial attorneys that deliver results through vigorous and skilled advocacy. Whether through aggressive trial representation, strategic settlement negotiations or alternative dispute resolution, we aim to achieve your business objectives.

Our trial attorneys have extensive litigation experience in courts throughout the United States and handle cases involving all aspects of intellectual property and related claims. Our practice also includes investigations before the International Trade Commission and patentability reviews and reexaminations before the Patent Office.

As the interaction between IP rights and competition law increases, our clients benefit from our anti-trust experience and our ability to represent them in cases concerning breaches of competition law.

We recognize that most intellectual property cases don't require an army of lawyers performing every conceivable task. Instead, we bring to the table the right resources at the right time to achieve effective results in the most cost-efficient way possible. Our clients get the legal talent they expect from a large firm plus the value and personal attention of a firm next door.

We are invested in you as much as your success, so we strive to develop value-driven relationships. Clients appreciate our real-world approach, and we are proud to call many of them friends. As a result, our clients call upon us – repeatedly and exclusively – to represent them in their most significant IP cases throughout the country.

Our clients choose us because we achieve their goals, and our peers recognize us for our accomplishments. Our trial attorneys have been designated as Connecticut and New England Super Lawyers™, *Best Lawyers in America*, Local Litigation Stars by *Benchmark Litigation* and have been included on lists of the "Top 10 Connecticut Super Lawyers," "Connecticut Top 50 Super Lawyers," and "New England Top 100 Super Lawyers".

Carmody's appellate lawyers offer a formidable combination of experience in patent, trademark, trade secret, copyright and law, with a deep understanding of the rules of appellate procedure. Our experience in handling intellectual property appeals spans:

- USPTO actions
- Appeals to the Federal Circuit in patent cases
- ITC Section 337 investigations
- Appeals to the federal courts of appeals in trademark and copyright cases
- Petitions for certiorari



Backed by this powerful combination of IP and appellate experience, we argue regularly before the US Court of Appeals for the Federal Circuit on behalf of our IP clients.

Employment Litigation

We defend employers and business executives accused of violating provisions of employment agreements including confidentiality and non-competes. We also have defended many wrongful discharge, wage and hour, employment discrimination, and harassment and retaliation claims including many ADA, ADEA, Title VII, sexual harassment, constructive discharge, workers' compensation retaliation, and whistle-blower retaliation claims in federal and state forums.

We regularly defend public, private, for profit and non-profit employers. We handle employment matters before federal and state courts, the National Labor Relations Board (NLRB) and the Connecticut Board of Labor Relations, Connecticut Board of Mediation and Arbitration, the Equal Employment Opportunity Commission (EEOC), the Massachusetts Commission Against Discrimination (MCAD), the New York State Division of Human Rights, the Connecticut Commission on Human Rights and Opportunities (CHRO), the U.S. and Connecticut Departments of Labor, U.S. Wage & Hour Division, the Occupational Safety and Health Administration (OSHA) and the Connecticut Workers' and Unemployment Compensation Commissions.

EXHIBIT B

In re Teva Securities Litigation, No. 3:17-cv-00558 (SRU)

Summary of Carmody Timekeeper Qualifications, Experience, and Role in the Action

PARTNERS

Liam S. Burke (9.60 hours): Mr. Burke is a Partner at Carmody and graduated from Michigan State University College of Law in 2007. Mr. Burke was involved in researching and drafting Ontario Teachers' lead plaintiff motion filed in the District of Connecticut.

John Cordani Jr. (61.10 hours): Mr. Cordani was a Partner at Carmody through June 2018 and graduated from Cornell Law School in 2011. He participated in researching and preparing the complaints and the opposition to Defendants' first set of motions to dismiss.

Brian A. Daley (5.40 hours): Mr. Daley was a Partner at Carmody and graduated from Duke University School of Law in 2002. He provided legal analysis regarding amending the complaint and assisted with *pro hac vice* applications.

Marc J. Kurzman (215.10 hours): Mr. Kurzman is a Partner at Carmody and graduated from Columbia University School of Law in 1983. Mr. Kurzman assisted in preparing for and attended hearings and status conferences and was involved in developing litigation strategy throughout the case. Mr. Kurzman was also involved in (a) the lead plaintiff motion process, (b) the drafting of the complaints and opposing the related motions to dismiss, (c) litigation strategy in connection with Defendants' various motions to compel and related submissions seeking further discovery and depositions from Ontario Teachers', Anchorage, and their investment advisors, and (d) participating in mediation sessions and settlement discussions.

Fatima Lahnin (6.50 hours): Ms. Lahnin is a Partner at Carmody and is a 2001 graduate of the Northeastern University School of Law. Beginning in the summer of 2021, Ms. Lahnin advised on litigation and trial strategy.

Todd Michaelis (20.50 hours): Mr. Michaelis is a Partner at Carmody and a 2009 graduate of Boston College Law School. Mr. Michaelis conducted legal research regarding claims under the Securities Act of 1933 in connection with drafting the complaints and conducted legal research regarding insurer liability in connection with mediation strategy.

Peter M. Nolin (6.40 hours): Mr. Nolin is a Partner at Carmody and graduated from the University of Connecticut School of Law in 1981. Beginning in the summer of 2021, Mr. Nolan advised on litigation and trial strategy.

J. Christopher Rooney (706.60 hours): Mr. Rooney is a Partner at Carmody and graduated from the University of Connecticut School of Law in 1984. Mr. Rooney was the lead attorney from Carmody who assisted in preparing for and attended nearly all hearings and status conferences and was involved in developing litigation strategy throughout the case. Mr. Rooney was primarily involved in (a) reviewing, revising, and commenting on all filings in the case, (b) conferring with the Department of Justice regarding fact depositions, (c) participating in the Rule 30(b)(6)

depositions of Ontario Teachers' and one of Teva's lead underwriters, and (d) participating in mediation sessions and settlement discussions.

James Robertson (91.80 hours): Mr. Robertson is a Partner at Carmody and graduated from the University of Connecticut School of Law in 1974. Mr. Robertson joined the litigation team in the summer of 2021 and advised on the litigation, trial, and mediation strategies based on his experience as a mediator, special master, and Connecticut Superior Court Judge. Mr. Robertson also participated in the mediation and settlement efforts.

ASSOCIATES

Timothy A. Smith (367.10 hours): Mr. Smith is an Associate at Carmody and graduated from the Quinnipiac University School of Law in 2009. Mr. Smith was primarily involved in (a) analyzing Defendants' and third parties' document productions and prioritizing key documents, (b) conducting legal research regarding deposition witnesses involved in the Department of Justice's criminal prosecution, (c) analysis of Defendants' privilege logs and strategy to resolve objections to improper privilege designations, and (d) analysis regarding ongoing opioid-related actions against Teva.

PARALEGAL

Shelby S. LaChance (11.60 hours): Ms. LaChance is a Paralegal at Carmody. She assisted in preparing document summaries in connection with discovery responses, expert reports, and the motions for partial summary judgment and exclusion of Defendants' experts.

EXHIBIT C*In re Teva Securities Litigation*, No. 3:17-cv-00558 (SRU)**Carmody Timekeeper Lodestar Summary**

Inception through and including April 14, 2022

Name	LS Grad. Year	Position	Current Rate	Hours	Lodestar
Burke, Liam S.	2007	P	\$375	9.60	\$3,600.00
Cordani, John Jr.	2011	P	\$340	61.10	\$20,774.00
Daley, Brian A.	2002	P	\$375	5.40	\$2,025.00
Kurzman, Marc J.	1983	P	\$540	215.10	\$116,154.00
Lahnin, Fatima	2001	P	\$470	6.50	\$3,055.00
Michaelis, Todd	2009	P	\$425	20.50	\$8,712.50
Nolin, Peter M.	1981	P	\$575	6.40	\$3,680.00
Rooney, J. Christopher	1984	P	\$510	706.60	\$360,366.00
Robertson, James	1974	P	\$540	91.80	\$49,572.00
Smith, Timothy A.	2009	A	\$300	367.10	\$110,130.00
LaChance, Shelby S.	NA	PL	\$225	11.60	\$2,610.00
TOTAL				1,501.70	\$680,678.50

Legend
P – Partner
A – Associate
PL – Paralegal

EXHIBIT D*In re Teva Securities Litigation*, No. 3:17-cv-00558 (SRU)**Carmody Expense Summary**

Inception through and including April 14, 2022

<i>CATEGORY</i>	<i>AMOUNT</i>
Computer Research	\$951.83
Court Reporter Services and Transcript Fees	\$2,257.40
Postage & Overnight Mail	\$124.26
Service and Filing Fees	\$1,250.00
Meals	\$70.68
Out-of-Town Transportation	\$83.65
<i>TOTAL</i>	<i>\$4,737.82</i>