

# **Exhibit 9**

**Declaration of Susan R. Podolsky in Support of  
Lead Counsel's Motion for Awards of Attorneys'  
Fees and Litigation Expenses, Filed on Behalf of  
The Law Offices of Susan R. Podolsky**

**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 SUSAN R. PODOLSKY IN SUPPORT OF  
LEAD COUNSEL’S MOTION FOR AWARDS OF  
ATTORNEYS’ FEES AND LITIGATION EXPENSES,  
FILED ON BEHALF OF THE LAW OFFICES OF SUSAN R. PODOLSKY**

I, Susan R. Podolsky, hereby declare pursuant to Section 1746 of Title 28 of the United States Code:

1. I am an attorney admitted to practice *pro hac vice* in this Court and am the Principal of The Law Offices of Susan R. Podolsky. I have personal knowledge of the matters set forth herein.<sup>1</sup>

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 my firm in connection with prosecuting the above-captioned action (the “Action”). My firm served as additional 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 a brief biography of my firm providing further information regarding my qualifications and experience. I am a 1986 graduate from the University of Virginia Law School. After graduation, I clerked for Judge Albert V. Bryan, Jr.,

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

then-Chief Judge for the Eastern District of Virginia, and then joined Jenner & Block where my practice centered on nationwide litigation. I have nearly a decade of experience prosecuting securities class actions, including representing Ontario Teachers' in *Computer Science Corp. Securities Litigation*, which resolved in 2013 for \$97.5 million, then the second-largest all-cash recovery in a securities class action in the history of the Eastern District of Virginia. No. 1:11-cv-00610-TSE-IDD (E.D. Va. Sept. 20, 2013), ECF 336. Other recent securities class actions that I have prosecuted include: *In re Willis Towers Watson PLC Proxy Litigation*, No. 1:17-cv-01338-AJT-JFA (E.D. Va. May 21, 2021), ECF 345 (\$75 million recovery); *In re Genworth Financial Inc. Securities Litigation*, No. 3:14-cv-00682-JAG-RCY (E.D. Va. Sept. 26, 2016), ECF 214 (\$219 million recovery); *In re NII Holdings, Inc. Securities Litigation*, No. 1:14-cv-00227-LMB-JFA (E.D. Va. Sept. 16, 2016), ECF 265 (\$41.5 million recovery); and *In re Lumber Liquidators Holdings, Inc. Securities Litigation*, No. 4:13-cv-00157-AWA-DEM (E.D. Va. Nov. 17, 2016), ECF 204 (\$45 million recovery).

4. In this Action, I joined the litigation team in September 2018 in connection with opposing Defendants' motions to dismiss the Amended Consolidated Class Action Complaint, and have been integrally involved since that time. My work primarily involved: (a) preparing Class Representatives' discovery requests and responding to Defendants' discovery requests, (b) briefing the consolidation motion; (c) drafting the motions to compel and status conference submissions; (d) conferring and negotiating with counsel for Defendants, the Department of Justice, and third parties in connection with discovery disputes; (e) structuring document review and deposition preparation processes; (f) briefing the class certification motion; (g) developing strategy for fact and expert depositions; (h) formulating strategy for oral argument during hearings and status conferences; (i) working with Plaintiffs' experts; (j) working with Class Representatives

regarding Defendants' discovery requests; (k) drafting an order of proof supporting the Class's claims and developing the evidentiary bases for evidence to be introduced at trial; (l) drafting the motion for partial summary judgment and *Daubert* motions to exclude Defendants' merits experts; (m) preparing for and participating in mediation and settlement discussions; and (n) preparing the preliminary approval and final approval motion papers.

5. Exhibit B is a schedule summarizing my time devoted to this Action from the beginning of my involvement in September 2018 through and including April 14, 2022. This schedule was prepared from contemporaneous daily time records that I regularly prepare and maintain, and I reviewed these records to confirm their accuracy. The time that I expended in preparing the application for fees and expenses has been excluded.

6. Following this review and the adjustments made, as set forth in Exhibit B, I devoted 3,910.50 hours to prosecuting the Action. My total lodestar is \$2,541,825.00. I believe the time reflected in this lodestar calculation, as set forth herein, is reasonable in amount and was necessary for the effective and efficient prosecution of the Action.

7. As indicated in Exhibit B, my current hourly rate is \$650. This is the same rate that I have submitted to, and that has been accepted by, courts for lodestar cross-checks in other securities class action fee applications. *See Willis Towers Watson PLC Proxy Litig.*, No. 1:17-cv-01338-AJT-JFA (E.D. Va. May 21, 2021), ECF 347; *In re Genworth Financial Inc. Sec. Litig.*, No. 3:14-cv-00682-JAG-RCY (E.D. Va. Sept. 26, 2016), ECF 216.

8. Exhibit C provides a summary by category of the expenses my firm incurred in connection with the prosecution of this Action, totaling \$22,093.35. The information provided in Exhibit C 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 C, I have reviewed these records to confirm the accuracy of the expenses incurred, as well as the reasonableness of and necessity for those expenses. As part of the review, certain reductions were made in the exercise of judgment or based on capping expense reimbursement for business meals and hotel accommodations. Specifically, hotel expenses are capped at a maximum of \$300 per night for large cities and \$250 per night for smaller cities. Case-related meal expenses are capped at \$45 per person for dinners, \$20 per person for lunches, and \$15 per person for all other food and drink. These caps resulted in write-offs totaling \$2,518.48, which are not included in Exhibit C and for which Lead Counsel is not seeking an award.

9. I believe that Exhibit C 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 I would typically bill to a fee-paying client.

Dated: Alexandria, Virginia  
April 27, 2022

By: /s/ Susan R. Podolsky  
Susan R. Podolsky

**EXHIBIT A**

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

**The Law Offices of Susan R. Podolsky Firm Resume**

PODOLSKY LAW OFFICES  
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PODOLSKYLAW.COM



**Educational Background:**

J.D., 1986, University of Virginia School of Law.

4-month Leningrad State University Russian Language program (1982).

A.B., 1981, Dartmouth College (*magna cum laude*). Member of Phi Beta Kappa. Captain of Varsity Tennis Team, sophomore and senior seasons. Major: Russian Language and Literature. Received three commendation awards for highest achievement.

**Professional Background:**

**2006 – present:** Solo practitioner, concentrating on civil corporate litigation and advising and assisting corporate clients, associations, and individuals on a variety of legal matters and issues. Recent work includes large securities fraud litigations, large securities arbitration for corporate client, various litigations and litigation-related tasks for corporate and individual clients, various counseling matters such as contract drafting and negotiation.

Securities fraud litigation highlights include: *Ontario Teachers' Pension Plan Board, et al. v. Teva Pharmaceuticals* (\$420 million settlement pending approval); *In Re: Willis Towers Watson PLC Proxy Litigation* (\$75 million recovery); *In re: Genworth Financial Inc. Securities Litigation* (\$219 million recovery); *In re: Computer Sciences Corp. Securities Litigation* (\$97.5 million recovery); *In re: NII Holdings, Inc. Securities Litigation* (\$41.5 million recovery); *In re: Lumber Liquidators Holdings, Inc. Securities Litigation* (\$45 million recovery).

**1993 - July 2005:** Partner, Jenner & Block LLP.

Awardee of the 2003 Albert E. Jenner Pro Bono Award for litigating race discrimination class action suit for ten years against municipal (Baltimore City) and federal housing agencies.

Member of the Litigation Practice, specializing in large, complex civil commercial cases in a variety of sectors, including telecommunications, contracts, intellectual property, and employment. Tried significant litigation matters of all sizes and consistently obtained successful results. Managed large discovery and document production projects, including electronic discovery projects, related to litigation,

antitrust, and investigation matters. Federal litigation practice included national experience, with a particular focus on the Eastern District of Virginia.

Advised and counseled businesses on various legal matters and issues.

**1988-1993:** Associate, Jenner & Block LLP.

**1986-88:** Law clerk for Albert V. Bryan, Jr, then-Chief Judge of the Eastern District of Virginia.

**1981-83:** Legislative Correspondent and Legislative Assistant to United States Senator Donald W. Riegle, Jr. Responsible for correspondence, legislation, and policy with respect to Senator Riegle's service on the Senate Committee on Commerce, Science & Transportation.

**Bar and Court Admissions:**

Admitted to practice in the following state and federal jurisdictions: Virginia, District of Columbia, Maryland.

Admitted to practice in the following courts: Eastern District of Virginia, Western District of Virginia, District of Maryland, District Court for the District of Columbia, Court of Appeals for the Fourth Circuit, Court of Appeals for the D.C. Circuit, United States Supreme Court, Virginia Supreme Court, District of Columbia Court of Appeals.

**Professional and Non-Profit Associations:**

President, Women's Eastern Golf Association

Board Member, Northern Virginia Chapter of the Federal Bar Association

Member, Virginia State Bar

Member, Maryland State Bar

Member, District of Columbia Bar Association

Member, Alexandria Bar Association

Member, Federal Bar Association

American Bar Association

**Memberships:**

Mount Vernon Country Club

Detroit Golf Club

**EXHIBIT B**

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

**The Law Offices of Susan R. Podolsky Lodestar Summary**

Inception through and including April 14, 2022

<b>Name</b>	<b>LS Grad. Year</b>	<b>Position</b>	<b>Current Rate</b>	<b>Hours</b>	<b>Lodestar</b>
Podolsky, Susan R.	1986	Principal	\$650	3,910.50	\$2,541,825.00

**EXHIBIT C**

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

**The Law Offices of Susan R. Podolsky Expense Summary**

Inception through and including April 14, 2022

<b><i>CATEGORY</i></b>	<b><i>AMOUNT</i></b>
External Photocopies	\$270.64
Accommodations	\$11,349.71
Meals	\$1,090
Local Transportation	\$798.60
Out-of-Town Transportation	\$8,584.40
<b><i>TOTAL</i></b>	<b><i>\$22,093.35</i></b>