

Exhibit A

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IRON WORKERS DISTRICT COUNCIL OF
NEW ENGLAND HEALTH AND WELFARE
FUND, UTAH-IDAHO TEAMSTERS
SECURITY FUND, JACKSONVILLE POLICE
OFFICERS AND FIRE FIGHTERS HEALTH
INSURANCE TRUST, and NYST COUNCIL
HEALTH & HOSPITAL FUND, on behalf of
themselves and others similarly situated,

Plaintiffs,

v.

TEVA PHARMACEUTICAL INDUSTRIES
LTD.; TEVA PHARMACEUTICALS USA, INC.;
TEVA BRANDED PHARMACEUTICAL
PRODUCTS R&D, INC.; and NORTON
(WATERFORD) LTD.,

Defendants.

Civ. No. 23-cv-11131-NMG

**DECLARATION OF JOSEPH M. VANEK ON BEHALF OF SPERLING KENNY
NACHWALTER IN SUPPORT OF CLASS COUNSEL’S MOTION FOR AWARD OF
ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES**

I, Joseph M. Vanek, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of the Supreme Court of the State of Illinois and the Supreme Judicial Court of the Commonwealth of Massachusetts.¹ I am a Partner with the law firm Sperling Kenny Nachwalter, LLC (“SKN”). I respectfully submit this Declaration in support

¹ I am also a member of the following federal courts: U.S. Supreme Court, U.S. Court of Appeals for the District of Columbia, U.S. Court of Appeals for the First Circuit, U.S. Court of Appeals for the Second Circuit, U.S. Court of Appeals for the Third Circuit, U.S. Court of Appeals for the Fifth Circuit, U.S. Court of Appeals for the Sixth Circuit, U.S. Court of Appeals for the Seventh Circuit, U.S. Court of Appeals for the Ninth Circuit, U.S. Court of Appeals for the Federal Circuit, U.S. District Court for the District of Columbia, U.S. District Court for the Central District of Illinois, U.S. District Court for the Northern District of Illinois, U.S. District Court for the Western District of Michigan, U.S. District Court for the Northern District of Ohio, U.S. District Court for the Eastern District of Texas, U.S. District Court for the Eastern District of Wisconsin.

of Class Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Expenses (the "Fee and Expense Application") in connection with the services rendered in this action and the proposed class action settlement with Defendants.²

2. The statements herein are true to the best of my personal knowledge, information and belief based on SKN's books and records and information received from its attorneys and staff. SKN's time and expense records are prepared and maintained in the ordinary course of business.

3. SKN serves as counsel of record for named plaintiff Iron Workers District Council of New England Health and Welfare Fund.

4. SKN also serves, along with Berman Tabacco and Hillard Shadowen, as Class Counsel for the settlement class.

5. I am the Partner who oversaw SKN's involvement in this action. SKN's time and expense records (including, where necessary, backup documentation) were contemporaneously recorded and kept in my firm's records. They have been reviewed to confirm both the accuracy of the entries as well as the necessity for and reasonableness of the time and expenses expended in this litigation. The time reflected in SKN's lodestar calculation and the expenses for which payment is sought are reasonable in amount and were necessary to prosecute this action and resolve the settlement before the Court. In addition, these fees and expenses are often charged by [the firm] to its fee-paying clients.

6. Set forth below is a summary reflecting the amount of time (after any applicable reductions) SKN attorneys and professional staff worked on this action from the inception of the

² "Defendants" means Teva Pharmaceutical Industries Ltd.; Teva Pharmaceuticals USA, Inc.; Teva Branded Pharmaceutical Products R&D, Inc.; and Norton (Waterford) Ltd.

case through the date of the settlement agreement's execution on September 25, 2025, the current billing rates applicable to such work, and the corresponding lodestar value of that work. The schedule was prepared based upon daily time records maintained by SKN attorneys and professional support staff in the ordinary course of business, and the lodestar calculations are based on SKN's current hourly billing rates.

Timekeeper	Position	Hourly Rate	Hours	Lodestar
Category 1: Legal Research				
Tom D. Brooks	Of Counsel	\$805.00	114.0	\$91,770.00
Joseph M. Vanek	Partner	\$1,375.00	16.8	\$23,100.00
David Lesht	Of Counsel	\$805.00	9.2	\$7,406.00
Martin V. Sinclair	Partner	\$805.00	0.6	\$483.00
Category 1 Total			140.6	\$122,759.00
Category 2: Pleadings and Motions				
Tom D. Brooks	Of Counsel	\$805.00	83.2	\$66,976.00
Joseph M. Vanek	Partner	\$1,375.00	80.6	\$110,825.00
David Lesht	Of Counsel	\$805.00	46.1	\$37,110.50
Martin V. Sinclair	Partner	\$805.00	13.2	\$10,626.00
Martin Amaro	Senior Counsel	\$805.00	9.2	\$7,406.00
Eamon P. Kelly	Partner	\$985.00	6.3	\$6,205.50
Dana Abraham	Associate	\$525.00	4.6	\$2,415.00
Category 2 Total			243.2	\$241,564.00
Category 3: Factual Investigation and Analysis				
Eamon P. Kelly	Partner	\$985.00	35.4	\$34,869.00
Martin Amaro	Senior Counsel	\$805.00	31.5	\$25,357.50
David Lesht	Of Counsel	\$805.00	30.6	\$24,633.00
Joseph M. Vanek	Partner	\$1,375.00	22.7	\$31,212.50
Dana Abraham	Associate	\$525.00	20.4	\$10,710.00
Martin V. Sinclair	Partner	\$805.00	5.6	\$4,508.00
Tom D. Brooks	Of Counsel	\$805.00	5.3	\$4,266.50
Category 3 Total			151.5	\$135,556.50
Category 4: Case Planning, Organization and Strategy				
Joseph M. Vanek	Partner	\$1,375.00	132.4	\$182,050.00
Martin Amaro	Senior Counsel	\$805.00	74.9	\$60,294.50
Martin V. Sinclair	Partner	\$805.00	71.9	\$57,879.50
Tom D. Brooks	Of Counsel	\$805.00	52.8	\$42,504.00

Timekeeper	Position	Hourly Rate	Hours	Lodestar
David Lesht	Of Counsel	\$805.00	47.0	\$37,835.00
Eamon P. Kelly	Partner	\$985.00	29.1	\$28,663.50
Dana Abraham	Associate	\$525.00	8.8	\$4,620.00
Category 4 Total			416.9	\$413,846.50
Category 5: Merits Discovery				
Martin Amaro	Senior Counsel	\$805.00	208.3	\$167,681.50
Tom D. Brooks	Of Counsel	\$805.00	128.0	\$103,040.00
Joseph M. Vanek	Partner	\$1,375.00	38.5	\$52,937.50
David Lesht	Of Counsel	\$805.00	32.9	\$26,484.50
Eamon P. Kelly	Partner	\$985.00	31.0	\$30,535.00
Martin V. Sinclair	Partner	\$805.00	17.1	\$13,765.50
Dana Abraham	Associate	\$525.00	2.8	\$1,470.00
Category 5 Total			458.6	\$395,914.00
Category 6: Deposition and Prep				
<i>(No hours recorded)</i>				
Category 6 Total			0	\$0.00
Category 7: Class Certification				
<i>(No hours recorded)</i>				
Category 7 Total			0	\$0.00
Category 8: Court Appearance and Preparation				
Martin Amaro	Of Counsel	\$805.00	2.1	\$1,690.50
Joseph M. Vanek	Partner	\$1,375.00	1.0	\$1,375.00
David Lesht	Of Counsel	\$805.00	0.5	\$402.50
Category 8 Total			3.6	\$3,468.00
Category 9: Work with Experts / Consultants				
Joseph M. Vanek	Partner	\$1,375.00	16.3	\$22,412.50
David Lesht	Of Counsel	\$805.00	1.4	\$1,127.00
Martin Amaro	Of Counsel	\$805.00	0.8	\$644.00
Category 9 Total			18.5	\$24,183.50
Category 10: Settlement Negotiations				
Joseph M. Vanek	Partner	\$1,375.00	61.7	\$84,837.50
Eamon P. Kelly	Partner	\$985.00	6.2	\$6,107.00
Category 10 Total			67.9	\$90,944.50

Timekeeper	Position	Hourly Rate	Hours	Lodestar
Category 11: Settlement Procedures & Admin (Post-Settlement Agt)				
(No hours recorded)				
Category 11 Total			0	\$0.00
GRAND TOTAL - ALL CATEGORIES				
Total			1,500.8	\$1,428,236.00

7. SKN's time records reflect a highly efficient, deliberately structured division of labor among its counsel, with each timekeeper performing a distinct, non-duplicative role aligned with litigation needs at different stages of the case. Senior attorneys concentrated their time on strategy, settlement, and high-level decision-making, while execution-focused attorneys handled discovery, factual development, and motion practice, supported by junior resources engaged in targeted analytical and factual work. This allocation ensured that tasks were consistently handled at the appropriate level of seniority and billing rate, avoiding unnecessary overlap while promoting efficiency and specialization. The resulting staffing model demonstrates a coordinated litigation team in which strategic direction, discovery execution, factual development, and legal briefing functioned as complementary and integrated workstreams rather than duplicative efforts, thereby supporting the reasonableness of the overall lodestar:

- *Joseph M. Vanek*. Mr. Vanek's time reflects the role of overall case leader at SKN and co-lead counsel for the Settlement Class, with substantial concentration on case planning and strategy and a uniquely significant commitment to settlement negotiations relative to the rest of the SKN team. He also maintained meaningful involvement in pleadings and motions, ensuring alignment between strategic objectives and briefing positions.

- *Martin V. Sinclair*. Mr. Sinclair's time is predominantly concentrated on case planning, organization, and strategy, with less involvement in execution-oriented categories. This allocation reflects a more high-level strategic oversight role at SKN, focused on guiding

litigation direction. His concentrated profile demonstrates top-level supervision without inefficiency or duplication.

- *Martin Amaro*. Mr. Amaro's time is heavily concentrated on merits discovery, while also maintaining a secondary role in case planning and factual investigation. This reflects his function as SKN's primary discovery lead and execution driver, responsible for managing and advancing the evidentiary record. His more limited involvement in motions and research further confirms that responsibilities at SKN were appropriately segmented rather than redundantly staffed.

- *Tom Brooks*. Mr. Brooks devoted a substantial portion of his time to legal research and pleadings/motions, with additional participation in discovery. This allocation reflects his central role at SKN in developing legal arguments and supporting motion practice, complementing senior strategic direction and factual development efforts. His work served as the primary bridge between legal research and briefing execution, without duplicating the roles of discovery or strategy leads.

- *David Lesht*. Mr. Lesht's time is evenly distributed across multiple core categories, including patent specific allegations in the pleadings, factual investigation, discovery, and strategy. This balanced allocation reflects his cross-functional role at SKN and his status as a member of the Patent Bar, integrating factual development with motion practice and contributing to strategic initiatives. His work supports the efficient translation of factual record development into litigation arguments, reducing fragmentation across workstreams.

- *Eamon Kelly*. Mr. Kelly's time is most concentrated in factual investigation and analysis, supplemented by work in discovery and case planning. This allocation reflects his role focused on developing and analyzing the factual record, supporting both discovery

execution and strategic decision-making.

- *Dana Abraham*. Ms. Abraham's time is primarily concentrated in factual investigation, with smaller contributions across research, pleadings, and strategy-related tasks. This allocation reflects her junior support role, performing targeted factual and analytical work under supervision.

8. The total time for which my firm is requesting an award of legal fees is 1,500.80 hours. The total lodestar value of these professional services is \$1,428,236.00. This request does not include substantial time spent on the settlement approval process after September 25, 2025.

9. The above hourly rates for SKN attorneys and professional support staff are the firm's current hourly rates. The hourly rates for attorneys and professional support staff in my firm are the same as the regular rates charged for their services in contingent fee matters and non-contingent fee matters. The time and lodestar spent preparing the Fee and Expense Application were also excluded from the above values.

10. SKN's lodestar figures do not include charges for expense items. Expense items are billed separately, and such charges are not duplicated in SKN's current billing rates. Further, expense items do not contain any general overhead costs and do not contain a surcharge over the amount paid to the corresponding vendor(s).

11. As detailed and categorized in the below schedule, SKN has incurred a total of \$161,019.27 in expenses from inception through June 2, 2026 for which Class Counsel seeks reimbursement from the settlement fund.

CATEGORY	COSTS from inception through 06/02/2026
Court Costs (e.g., filing fees)	\$0.00
Court Reporter Fees	\$0.00
Document Management (e.g., document review platform/hosting)	\$21.58
Experts/Consultants	\$60,000.00
Federal Express Fees	\$0.00
Investigation (e.g., investigators, purchase of reports, data)	\$1,846.75
Legal Research (e.g., Westlaw, Lexis, PACER, Bloomberg)	\$15,998.06
Litigation expense Fund	\$77,500.00
Messenger, Courier & Delivery Fees	\$0.00
Photocopies - in House	\$0.00
Photocopies - Outside	\$681.00
Postage	\$0.00
Service of Process Fees	\$0.00
Telephone	\$0.00
Transcript Fees	\$0.00
Travel (travel, lodging, meals)	\$4,971.88
TOTAL:	\$161,019.27

12. The above schedule was prepared based upon expense records reflected in the books and records of SKN. These books and records are prepared from expense vouchers, check records, receipts, and other source materials.



Executed on June 1, 2026
Chicago, Illinois

Joseph M. Vanek