

# Exhibit D

**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 LEE ALBERT ON BEHALF OF GLANCY PRONGAY WOLKE &  
ROTTER LLP IN SUPPORT OF CLASS COUNSEL’S MOTION FOR AWARD OF  
ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES AND  
CLASS REPRESENTATIVE SERVICE AWARD**

I, Lee Albert, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a Partner with the law firm Glancy Prongay Wolke & Rotter LLP (“GPWR”).

I respectfully submit this Declaration in support 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.<sup>1</sup>

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<sup>1</sup> “Defendants” means Teva Pharmaceutical Industries Ltd.; Teva Pharmaceuticals Usa, Inc.; Teva Branded Pharmaceutical Products R&D, Inc.; and Norton (Waterford) Ltd.

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

3. This firm serves as counsel of record for Jacksonville Police Officers and Fire Fighters Health Insurance Trust ("Jacksonville Police & Fire"), who serve as a named plaintiff in this action.

4. I am the partner who oversaw my firm's involvement in this action. GPWR'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 GPWR'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.

5. During this litigation, and as detailed herein, GPWR attorneys worked on assignments which it was specifically directed to perform by Class Counsel.

6. Set forth below is a summary reflecting the amount of time (after any applicable reductions) GPWR's attorneys worked on the Action from the inception of the case through the date of the settlement agreement's execution on September 25, 2025, the 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 GPWR's attorneys and professional support staff in the ordinary course of business, and the lodestar calculations are based on the firm's hourly billing rates.

<b>TIMEKEEPER</b>	<b>CATEGORY</b>	<b>CURRENT HOURS (Inception through 9/25/25)</b>	<b>HOURLY RATE</b>	<b>CURRENT LODESTAR</b>
Lee Albert (P)	Pleadings and Motions; Case Planning and Strategy; Discovery	146.40	\$1,300.00	\$190,320.00
Brian Brooks (P)	Pleadings Factual Investigation; Case Planning; Strategy; Discovery; and Settlement	79.70	\$1,100.00	\$87,670.00
Brian Murray (P)	Strategy	1.30	\$1,300.00	\$1,690.00
Gregory Linkh (P)	Pleadings	34.00	\$1,100.00	\$37,400
<b>Attorney Totals</b>		261.40		
<b>TOTAL:</b>		<b>261.40</b>		<b>\$317,080.00</b>

7. The services GPWR performed on behalf of the putative class include, but are not limited to, the following:

- Preparation of Filing the Amended Class Action Complaint;
- Meeting with, and working with Jacksonville Police & Fire to attain and to review their data and documents over multiple periods of time;
- Working with Jacksonville Police & Fire and its Pharmacy Benefit Manager (“PBM”), AETNA, together, to gather necessary fund data and documents for the amended complaint, discovery, and the litigation generally;
- Participating in defensive discovery by working with Jacksonville Police & Fire to search for documents, and reviewing all documents for responsiveness to discovery, requested by defendants, and reviewing documents for privilege;
- Working with attorneys for Lead Counsel on multiple occasions, to assist in determining the appropriate fields for the Transactional Data discovery; preparation for meetings with Defendants;

- Working with the Jacksonville Police & Fire's PBM to answer all questions pertaining to Jacksonville Police & Fire's Documents and providing updated information from the PBM on multiple occasions;
- Reviewing Transactional data for Jacksonville Police & Fire provided by PBM.
- Reviewing case filings, including the Motion to Dismiss and its Opposition with and discussing the filings with Jacksonville Police & Fire representatives;
- Provided multiple status updates to Jacksonville Police & Fire via email and telephone, and in person;
- Worked with Jacksonville Police & Fire on assisting with responses to multiple sets of Interrogatories addressed to Jacksonville Police & Fire specifically, and the EPPs generally; worked with Lead Counsel re responding to the Interrogatories;
- Worked with Jacksonville Police & Fire representatives in having its IT staff go through the Fund's computer system to collect relevant documents for the case, at the request of Defendants;
- Assisted Lead counsel with Meet and Confers with Defendants regarding Plaintiffs' answers and objections to Requests for Production and Interrogatories;
- Conducted Legal research on issues discussed at the Meet and Confers and discussed the research with Lead Counsel;
- Reviewing Jacksonville Police & Fire documents received from their PBM, searching for irrelevant and/or protected information prior to production;
- Reviewing Jacksonville Police & Fire documents received from the collection of client's computer systems searching for irrelevant and/or protected information prior to production;
- Discussing the settlement proposal with Jacksonville Police & Fire.

8. The total time for which my firm is requesting an award of legal fees is 261.40 hours. The total lodestar value of these professional services is \$317,080.00.

9. The above hourly rates for GPWR's attorneys are the firm's hourly rates. The hourly rates for attorneys in my firm are the same as the regular rates charged for their services in

contingent fee matters. The time and lodestar spent preparing the Fee and Expense Application were also excluded from the above values.

10. The firm's lodestar figures do not include charges for expense items. Expense items are billed separately, and such charges are not duplicated in the firm'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 schedule below, GPWR has incurred a total of \$8,012.39 in expenses from inception through June 2, 2026 for which Class Counsel seeks reimbursement from the settlement fund.

<b>CATEGORY</b>	<b>COSTS from inception through 06/02/2026</b>
Legal Research (e.g., Westlaw, Lexis, PACER, Bloomberg)	\$512.39
Litigation Fund Contribution	\$7,500.00
<b>TOTAL:</b>	<b>\$8,012.39</b>

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

#### **CLASS REPRESENTATIVE SERVICE AWARD**

13. Jacksonville Police Fire Fighters served as a named plaintiff in this action knowing that it would be required to produce financial records and information, provide pretrial testimony and otherwise participate in pretrial discovery, and appear at trial if necessary.

14. Jacksonville Police Fire Fighters, Executive Director of the Health Trust, is Randy Wyse.

15. Jacksonville Police & Fire collected and produced documents to respond to document requests propounded by Defendants in this Action. Randy Wyse assisted GPWR in the

searches reviewing the files of Jacksonville Police Fire Fighters; multiple meetings with the IT staff to have them understand where the places in the Funds' system that documents would be located; and Director Wyse spent hours reviewing the documents collected and those documents and data received from the PBM.

16. Jacksonville Police & Fire voluntarily undertook the burdens and risks associated with this lawsuit when they reviewed the Amended Complaint and joined this lawsuit as one of the Class Plaintiffs in 2023 when the Amended Complaint was filed.

17. Prior to serving as a Class Representative, Jacksonville Police & Fire was not asked to condition, nor did they condition their participation upon receiving an incentive award.

18. As a Class Plaintiff Jacksonville Police & Fire participated in this lawsuit by following the status and progress of the case and discussing the case with counsel, over the phone, in person, and by email, to stay informed. All of these discussions concerning the case, seeking documents for the case, contacting its PBM, AETNA, were all done on work time by Executive Director Wyse during work hours for the benefit of the Class.

19. Since the inception of Jacksonville Police & Fire joining this case in 2013, Executive Director Wyse has diligently performed the Fund's duties as a Class Representative to assist its counsel in prosecuting this case, investing significant time and effort to fulfill that role. To that end, I forwarded to Director Wyse and he read the operative Amended Complaint, I spoke with Director Wyse throughout this litigation, he has remained informed about the status of the case by communication with counsel about litigation strategies, reviewing periodic updates and becoming apprised of key case documents, spending hours reviewing Jacksonville Police & Fire records and documents, answers to interrogatories (verifying the interrogatories responses and

supplementary interrogatory responses, requests for production responses), and answering any and all questions counsel requested, including about the settlement, and this Declaration.

20. Executive Director Wyse also spent a significant amount of time assisting counsel to gather transactional records from the PBM, AETNA, and reviewing this material with counsel.

21. Jacksonville Police & Fire gathered and provided information to provide verified responses to interrogatories (both initial and supplementary responses) propounded by Defendants in this Action.

22. Jacksonville Police & Fire estimates that it has spent at least 15 hours performing all of the above-described duties on behalf of the class during the course of this litigation. No promises regarding compensation for the services of counsel were made and Jacksonville Police & Fire willingly agreed to participate in this case with no guarantee of personal benefit. Jacksonville Police & Fire has helped to make the settlements possible and therefore ask that the Court approve its service award in the amount of \$20,000. I believe such an award is reasonable considering the assistance provided and poses no risk of undermining its ability to adequately represent the Class.

23. Class Counsel have requested that Jacksonville Police & Fire and the other named plaintiffs receive a \$20,000 service award each as compensation for their efforts on behalf of the class members. A service award, or even a request for one, was not at any time a condition for their involvement in this action as a named plaintiff and class representative.

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

Executed on May 28th, 2026  
Montgomery County, PA

/s/Lee Albert  
Lee Albert