

# Exhibit F

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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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 MARCO CERCONO ON BEHALF OF RUPP PFLAZGRAF LLC  
IN SUPPORT OF CLASS COUNSEL’S MOTION FOR AWARD OF ATTORNEYS’  
FEES AND REIMBURSEMENT OF EXPENSES**

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

1. I am a Partner with the law firm Rupp Pfalzgraf LLC (“RP”). 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>

2. The statements herein are true to the best of my personal knowledge, information and belief based on the RP’s books and records and information received from its attorneys and

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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.

staff. RP's time and expense records are prepared and maintained in the ordinary course of business.

3. This firm serves as counsel of record for New York State Teamsters Council Health & Hospital Fund ("NYST"), who serve as a named plaintiff in this action.

4. I am the partner who oversaw my firm's involvement in this action. RP'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 RP'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 RP to its fee-paying clients.

5. During the course of this litigation, and as detailed herein, RP worked on assignments that 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) RP attorneys and professional staff worked on the Action from the inception of the 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 RP attorneys and professional support staff in the ordinary course of business, and the lodestar calculations are based on the firm's current hourly billing rates.<sup>2</sup>

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<sup>2</sup> "P" refers to Partners, "A" to Associates, "PA" to Project Attorneys, "LC" to Law Clerks, "CL" to Contract Lawyers, "PL" to Paralegals, and "O" to Other staff.

<b>TIMEKEEPER</b>	<b>CATEGORY</b>	<b>CURRENT HOURS (inception through 1/15/26)</b>	<b>HOURLY RATE</b>	<b>CURRENT LODESTAR</b>
Arthur N. Bailey (P)	Legal Research	3	\$495.00	\$1,485.00
Arthur N. Bailey (P)	Factual Inv. & Analysis	7.6	\$495.00	\$3,762.00
Arthur N. Bailey (P)	Case Strategy	18.1	\$495.00	\$8,959.50
Arthur N. Bailey (P)	Merits Discovery	27.2	\$495.00	\$13,464.00
Marco Cercone (P)	Factual Inv. & Analysis	1.3	\$525.00	\$682.50
Marco Cercone (P)	Case Strategy	.3	\$525.00	\$157.50
Marco Cercone (P)	Merits Discovery	70.5	\$525.00	\$37,012.50
Marco Cercone (P)	Deposition & Prep	.8	\$525.00	\$420.00
Marco Cercone (P)	Settlement Procedures & Admin	5.7	\$525.00	\$2,992.50
Robert McDonald (A)	Merits Discovery	124	\$350.00	\$43,400.00
Matthew Leitch (A)	Merits Discovery	55.3	\$375.00	\$20,737.50
Mara McCormick (A)	Legal Research	4.2	\$325.00	\$1,365.00
Mara McCormick (A)	Merits Discovery	23.1	\$325.00	\$7,507.50
<b>Attorney Totals</b>		<b>341.1</b>		<b>\$141,945.50</b>
Theresa Hobbs (PL)	Case Planning & Strategy	.2	\$275.00	\$55.00
Theresa Hobbs (PL)	Merits Discovery	82	\$275.00	\$22,550.00
Theresa Hobbs (PL)	Settlement Procedures & Admin	.8	\$275.00	\$220.00
<b>Non-Attorney Totals</b>		<b>83.0</b>		<b>\$22,825.00</b>
<b>TOTAL:</b>		<b>424.1</b>		<b>\$164,770.50</b>

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

Our firm retained and regularly communicated with the class representative, NYST, including conducting ongoing case update meetings with the client throughout the litigation. We participated in case status, planning, and strategy meetings with co-counsel and assisted in developing litigation strategy. Our attorneys analyzed and responded to defendants' requests for production, interrogatories, and other discovery demands, while working closely with the client to collect, review, and analyze discovery documents. This process required strict adherence to redaction protocols, confidentiality orders, and HIPAA requirements throughout discovery. We also continued work on merits-based discovery procedures and coordinated with the client and co-counsel regarding settlement negotiations and related administrative matters.

8. The total time for which my firm is requesting an award of legal fees is 424.1 hours. The total lodestar value of these professional services is \$164,770.50.

9. The above hourly rates for RP 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. 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 below schedule, Rupp Pfalzgraf has incurred a total of \$144.10 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>
Court Costs (e.g filing fees)	
Court Reporter Fees	
Federal Express, courier, delivery fees	
Legal Research (e.g., Westlaw, Lexis, PACER, Bloomberg)	
Litigation Fund Contribution	
Photocopies - in House	\$0.21
Postage	
Service of Process fees	
Telephone/telecopier	
Transcript fees	
Travel (transportation, lodging, meals, parking)	\$143.89
<b>TOTAL:</b>	<b>\$144.10</b>

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

13. The travel expenses above were for the sole purpose of meeting with our internal team to develop a strategic plan for coordinating discovery responses, document collection, and analysis efforts with our client and co-counsel.

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

14. NYST 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.

15. NYST collected and produced documents to respond to document requests propounded by Defendants in this action. NYST searched and compiled voluminous contracts, plan documentation, pricing notices, ESI materials, and more, going back nearly a decade. This process was time-consuming, involving multiple personnel across multiple departments.

16. NYST gathered and provided information to provide verified responses to interrogatories propounded by Defendants in this Action.

17. Class Counsel have requested that NYST 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 27, 2026  
Buffalo, New York

s/ Marco Cercone  
Marco Cercone