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17 *Co-Lead Class Counsel*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

18 *IN RE: XYREM (SODIUM OXYBATE)*
19 *ANTITRUST LITIGATION*

Case No. 3:20-md-02966-RS-SVK

20 This Document Relates To:
21 *All Class Actions*
22

**JOINT DECLARATION OF CO-LEAD
COUNSEL DENA C. SHARP AND
MICHAEL M. BUCHMAN IN SUPPORT
OF MOTION FOR ENTRY OF A SET-
ASIDE ORDER**

1 We, Dena C. Sharp and Michael M. Buchman, do hereby declare and state as follows:

2 1. We were appointed and presently serve as Co-Lead Counsel on behalf of the Class
3 Plaintiffs in the above-captioned litigation. ECF No. 500.

4 2. This declaration is submitted in support of a Motion for Entry of a Set-Aside Order.

5 3. Class Counsel have sought, collected, and reviewed Defendants' productions of
6 more than three million pages, and third-party productions of nearly 40,000 pages, and deposed
7 approximately twenty-nine fact witnesses.

8 4. Co-Lead Counsel have engaged with and retained numerous experts who may
9 testify at trial in this matter.

10 5. Class Counsel have collectively devoted tens of thousands of hours in attorney time
11 to this litigation to date and have also advanced substantial litigation costs, and expect to continue
12 to do so, as they prepare this matter for trial.

13 We declare under penalty of perjury that the foregoing is true and correct to the best of our
14 knowledge and belief pursuant to 28 U.S.C. § 1746.

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16 Dated: June 9, 2023

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/s/ Dena Sharp

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Dena C. Sharp

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-and-

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/s/ Michael M. Buchman

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Michael M. Buchman

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ATTESTATION

I, Dena C. Sharp, am the ECF User whose identification and password are being used to file this Motion for Class Certification Pursuant to Civil L.R. 5-1(i)(3). I attest under penalty of perjury that concurrence in this filing has been obtained from all counsel.

Dated: June 9, 2023

/s/ Dena C. Sharp

Dena C. Sharp

CERTIFICATE OF SERVICE

I hereby certify that on June 9, 2023, I electronically filed the foregoing document using the CM/ECF system, which will send notification of such filing to all counsel of record registered in the CM/ECF system. I also caused a copy of the foregoing document to be served via email on counsel of record for all parties.

Dated: June 9, 2023

/s/ Dena C. Sharp

Dena C. Sharp