

**IN THE COURT OF COMMON PLEAS OF
ALLEGHENY COUNTY, PENNSYLVANIA**

RAJESH PATEL, Individually and on Behalf) of All Others Similarly Situated,)	CIVIL DIVISION No. GD-21-13314
Plaintiff,)	LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND PAYMENT OF EXPENSES
v.)	
VIATRIS INC., PFIZER INC.,) MICHAEL GOETTLER,)	CLASS ACTION
SANJEEV NARULA, BRYAN SUPRAN,) MARGARET M. MADDEN,)	Filed on behalf of:
DOUGLAS E. GIORDANO,) ROBERT J. COURY, IAN READ, and)	PLAINTIFF RAJESH PATEL
JAMES KILTS,)	
Defendants.)	Counsel of Record for Plaintiff:

Gary F. Lynch (PA Id. No. 56887)
Kelly K. Iverson (PA Id. No. 307175)
LYNCH CARPENTER LLP
1133 Penn Avenue, 5th Floor
Pittsburgh, PA 15222
Tel.: 412-322-9243
Fax: 412-231-0246
gary@lcllp.com
kelly@lcllp.com

Max R. Schwartz (*pro hac vice*)
Marc J. Greco (*pro hac vice*)
Jonathan M. Zimmerman (PA Id. No. 322668)
SCOTT+SCOTT ATTORNEYS AT LAW
LLP
The Helmsley Building,
230 Park Avenue, 17th Floor
New York, NY 10169
Tel.: 212-223-6444
Fax: 212-223-6334
mschwartz@scott-scott.com
mgreco@scott-scott.com
jzimmerman@scott-scott.com

[Additional counsel appear on signature page]

1. Pursuant to Pa. R. Civ. P. 1716, Lead Counsel Scott+Scott Attorneys at Law LLP and Hall Firm Ltd., on behalf of Plaintiff’s Counsel, hereby respectfully request, in connection with the proposed settlement of the above-captioned class action: (i) an award of attorneys’ fees in the amount of one-third of the Settlement Fund, including accrued interest; (ii) payment of litigation expenses incurred by Plaintiff’s Counsel in the amount of \$164,005.56, plus accrued interest; and (iii) an award of \$7,500 to Lead Plaintiff for his effort on behalf of the proposed Settlement Class.¹

2. The Court has scheduled a hearing on the motion for June 12, 2024, at 1:00 p.m. at 816 City County Building, Pittsburgh, PA 15219.

3. The motion is supported by the accompanying memorandum of law and the Declaration of Max R. Schwartz in Support of (I) Lead Plaintiff’s Motion for Final Approval of Class Action Settlement and Plan of Allocation, (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Payment of Expenses, and (III) Lead Plaintiff’s Request for a Service Award, with annexed exhibits, filed herewith.

4. Members of the Settlement Class have until May 22, 2024, to object to the requested relief.

Dated: May 8, 2024

Respectfully submitted,

LYNCH CARPENTER LLP

/s Kelly K. Iverson

Gary F. Lynch (PA ID 56887)

Kelly K. Iverson (PA ID 307175)

1133 Penn Avenue, 5th Floor

Pittsburgh, PA 15222

Telephone: 412-322-9243

¹ Unless otherwise noted, capitalized terms have the meanings ascribed to them in the Stipulation and Agreement of Settlement, dated January 18, 2024 (the “Stipulation”), filed with the Court on January 18, 2024. Lead Counsel Scott+Scott Attorneys at Law LLP and Hedin Hall LLP as well as The Schall Law Firm and Lynch Carpenter LLP are Plaintiffs’ Counsel in the Action.

Facsimile: 412-231-0246
gary@lcllp.com
kelly@lcllp.com

Additional Counsel for Plaintiff

SCOTT+SCOTT ATTORNEYS AT LAW LLP

/s Max R. Schwartz

Max R. Schwartz (*pro hac vice*)
Jonathan M. Zimmerman (PA ID 322668)
Marc J. Greco (*pro hac vice*)
The Helmsley Building
230 Park Avenue, 17th Floor
New York, NY 10169
Telephone: 212-233-6444
Facsimile: 212-233-6334
mschwartz@scott-scott.com
jzimmerman@scott-scott.com
mgreco@scott-scott.com

HALL FIRM LTD.

David W. Hall
Armen Zohrabian
Four Embarcadero Center, Suite 1400
San Francisco, CA 94104
Telephone: 415-766-3534
Facsimile: 415-402-0058
dhall@hallfirm ltd.com
azohrabian@hallfirm ltd.com

Co-Lead Counsel for Plaintiff and Putative Class

THE SCHALL LAW FIRM

Brian J. Schall
2049 Century Park East, Suite 2460
Los Angeles, CA 90067
Telephone: 310-301-3335
Facsimile: 310-388-0192
brian@schallfirm.com

Additional Counsel for Plaintiff