

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

_____))
IN RE SALIX PHARMACEUTICALS, LTD.) Case No. 14 Civ. 8925 (KMW)
_____)) CLASS ACTION
_____))
_____)

SUPPLEMENTAL DECLARATION OF SALVATORE J. GRAZIANO

SALVATORE J. GRAZIANO, declares as follows:

1. I am a partner of the law firm of Bernstein Litowitz Berger & Grossmann LLP (BLB&G”). I submit this declaration in support of my firm’s request for the reimbursement of expenses incurred by my firm in connection with this litigation that were inadvertently not included in our original motion for attorneys’ fees and reimbursement of expenses filed on June 19, 2017. I have personal knowledge of the matters set forth herein.

2. My firm, which served as Lead Counsel in this Action, was involved in all aspects of the litigation and its settlement as set forth in the Declaration I previously submitted in support of Lead Plaintiff’s motion for final approval of the Settlement and Plan of Allocation and Lead Counsel’s application for an award of attorneys’ fees and reimbursement of expenses dated June 19, 2017 (ECF No. 225) (the “Graziano Declaration” or “Graziano Decl.”)

3. My firm incurred \$23,164.17 in expenses in connection with the prosecution of this litigation that were inadvertently not included in the list of expenses for which reimbursement was sought as set forth in the Graziano Declaration and the accompanying motion papers submitted on June 19, 2017. These additional expenses are for the costs of photocopying services provided by an outside vendor that were incurred by BLB&G in January 2017 in connection with preparing for and taking multiple depositions in the Action.

4. Inclusion of these expenses brings the total expenses for which BLB&G seeks reimbursement in the Action to \$1,947,188.15; brings the total expenses for which all Plaintiffs' Counsel seek reimbursement to \$1,953,908.41; and reduces the amount of requested fees to \$44,609,218 (because, under the terms of Lead Counsel's pre-litigation retainer agreement with Lead Plaintiff, attorneys' fees are requested as a percentage of the amount of the settlement after deduction of litigation expenses).

5. Attached hereto as Exhibits A, B and C are revised versions of charts relating to litigation expenses that were submitted with the original Graziano Declaration, which have been update to reflect the additional \$23,164.17 in outside copying expenses. Exhibit A is a revised version of BLB&G's Expense Report (Exhibit 2 to Exhibit 3-A to the Graziano Decl.) (ECF No. 225-4 at p. 7); Exhibit B is a revised version of the "Summary of Plaintiffs' Counsel's Lodestar and Expenses" (Exhibit 3 to the Graziano Decl.) (ECF No. 225-3); and Exhibit C is a revised version of the "Breakdown of All Expenses by Category" (Exhibit 4 to the Graziano Decl.) (ECF No. 225-7).

I declare, under penalty of perjury, that the foregoing facts are true and correct. Executed on July 17, 2017.

/s/ Salvatore J. Graziano
Salvatore J. Graziano

#1095528

EXHIBIT A**REVISED EXHIBIT 2 TO GRAZIANO DECL. EX. 3-A**

In re Salix Pharmaceuticals, Ltd.,
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BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP**EXPENSE REPORT**

Inception through May 31, 2017

CATEGORY	AMOUNT
Service of Process	6,775.40
On-Line Legal Research	49,720.40
On-Line Factual Research	14,144.40
Document Management/Litigation Support	8,723.21
Telephones/Faxes	333.54
Postage & Express Mail	3,2014.24
Hand Delivery Charges	220.00
Local Transportation	7,389.52
Internal Copying	10,459.40
Outside Copying	10,016.51
Out-of-Town Travel*	18,639.78
Working Meals	7,833.39
Court Reporting and Transcripts	6,051.04
Deposition/Meeting Hosting	1,988.93
Experts	1,437,077.61
Total Paid:	\$1,582,387.37
Outstanding Expenses:	
Document Management/Litigation Support	102,973.68
Outside Copying	23,164.17
Court Reporting and Transcripts	10,122.93
Experts	228,540.00
Total Outstanding:	\$364,800.78
TOTAL EXPENSES:	\$1,947,188.15

* Out of town travel includes hotels in the following "large cities" capped at \$350 per night: Columbus, Ohio, Washington, DC, and San Francisco, California; and the following "small" city capped at \$250 per night: Costa Mesa, California.

EXHIBIT B**REVISED EXHIBIT 3 TO GRAZIANO DECL.**

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**SUMMARY OF PLAINTIFFS' COUNSEL'S
LODESTAR AND EXPENSES**

Exhibit	FIRM	HOURS	LODESTAR	EXPENSES
3A	Bernstein Litowitz Berger & Grossmann LLP	29,758.25	\$12,349,533.75	\$1,947,188.15
3B	Robbins Geller Rudman & Dowd LLP	3,278.35	\$1,323,145.50	\$5,610.49
3C	Hach Rose Schirripa & Cheverie, LLP	1,365.75	\$512,820.00	\$1,109.77
	TOTAL:	34,402.35	\$14,185,499.25	\$1,953,908.41

EXHIBIT C**REVISED EXHIBIT 4 TO GRAZIANO DECL.***In re Salix Pharmaceuticals, Ltd.*,

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BREAKDOWN OF ALL EXPENSES BY CATEGORY

CATEGORY	AMOUNT
Court Fees	\$ 49.00
Service of Process	6,775.40
On-Line Legal and Factual Research	65,912.53
Document Management/Litigation Support	111,696.89
Telephone/Faxes	370.67
Postage & Express Mail	3,130.68
Hand Delivery Charges	220.00
Local Transportation	7,513.52
Internal Copying	10,677.70
Outside Copying	33,180.68
Out-of-Town Travel	22,724.94
Working Meals	7,875.89
Court Reporting and Transcripts	16,173.97
Deposition/Meeting Hosting	1,988.93
Experts	1,665,617.61
TOTAL EXPENSES:	\$1,953,908.41