

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

In re: VIOXX	*	MDL Docket No. 1657
	*	
PRODUCTS LIABILITY LITIGATION	*	SECTION L
	*	
	*	JUDGE FALLON
	*	
This document relates to All Cases	*	MAGISTRATE JUDGE KNOWLES

**EXHIBIT A – FEE AFFIDAVIT OF [NAME OF LAW FIRM] IN CONNECTION WITH
REQUEST FOR ALLOCATION OF AGGREGATE COMMON BENEFIT FEE AND
COSTS AWARD**

STATE OF _____

COUNTY/PARISH OF _____

BEFORE ME, the undersigned authority;

PERSONALLY CAME AND APPEARED:

(INSERT NAME OF PARTNER/AFFIANT)

who, after being first duly sworn, under penalty of perjury, did depose and declare that the following are true correct:

1. I am a partner in the law firm of _____.

2. The address of the law firm identified in number 1 above is _____.

3. I have complied with Pretrial Order No. 6, as amended, in all material aspects and the law firm identified herein has submitted true and correct time and expense submissions pursuant to the Court's Pretrial Orders. This Affidavit is submitted on behalf of all the members of the law firm of which I am a partner.

4. The Court may rely on the information submitted by my firm to Philip Garrett, the Court-appointed Certified Public Accountant, which is contained in his Case Cost Management System in this litigation, through the Initial Cut-off Date.

5. The extent to which the law firm identified in paragraph no. 1 above made a substantial common benefit contribution to the outcome of the litigation is described as follows:

a. The consistency quantum, duration, and intensity of the firm's commitment to the litigation is as follows:

b. The level of partner participation by the firm is as follows:

c. The firm's membership and leadership on the Plaintiffs' Steering Committee ("PSC") and/or Executive Committee and/or Class Counsel is as follows:

d. The firm's participation and leadership in discovery (motions, depositions) is as follows:

e. The firm's participation and leadership in law and briefing matters is as follows:

f. The firm's participation and leadership in science and experts matters is as follows:

g. The firm's participation and leadership in document review is as follows:

h. The firm's participation and leadership in settlement negotiations, drafting of settlement documentation and closing papers, and administration of settlement agreements (excluding individual representations) is as follows:

i. Where common benefit MDL work occurred:

j. The following members of the firm held leadership positions in groups that engaged in common benefit work (state position and group):

k. The firm's participation in ongoing activities, such as the Fee and Cost Committee, Settlement Claims Administration, or Court-Appointed Committees and Leadership, which are intended to provide common benefit included the following:

l. Counsel in the firm were or were not involved in the litigation prior to the formation of the MDL, and the time and expenses incurred during such time period outlined below were for common benefit:

m. The firm made the following significant contributions to the funding of the litigation (include all assessments made to the MDL) and the amount of any sums reimbursed and date(s) of reimbursement:

n. The members of the firm who were PSC members, Executive Committee members or Class Counsel whose commitment to the litigation did not ebb included:

o. The other relevant factors which the Fee Applicant requests be considered by the Court:

SWORN TO AND
SUBSCRIBED BEFORE ME
THIS ____ DAY OF
_____, 201__.

NOTARY PUBLIC Print

Name: _____

My commission

expires: _____

[APPLY SEAL]