

EXHIBIT 3

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

IN RE:

22-MD-3050 (KPF)

CHANTIX (VARENICLINE)
MARKETING, SALES PRACTICES AND
PRODUCTS LIABILITY LITIGATION
(NO. II)

22-MC-3050 (KPF)

This Document Relates to All Actions

**DECLARATION OF RUBEN HONIK IN SUPPORT OF CLASS COUNSEL’S MOTION
FOR ATTORNEYS’ FEES, REIMBURSEMENT OF EXPENSES,
AND SERVICE AWARDS**

I, Ruben Honik, pursuant to 28 U.S.C. §1746, hereby declare:

1. I am founding partner of the law firm of Honik LLC, was appointed interim Co-Lead Counsel for Plaintiffs, and am one of the appointed Class Counsel for the proposed Settlement Class. I submit this Declaration in support of Plaintiffs’ Motion for Attorneys’ Fees, Reimbursement of Expenses, and Service Awards filed concurrently herewith. I have personal knowledge of the matters stated herein and, if called upon as a witness, could and would testify competently to them.

2. Honik LCC served as interim Co-Lead Counsel and among Class Counsel in this action (the “Action”). Honik LLC brought many of the very first cases on behalf of the putative class that predated this Action’s formation as a multi-district litigation. Unless otherwise defined, capitalized terms have the meaning assigned in the Class Action Settlement Agreement between Plaintiffs and Defendant Pfizer, Inc. See ECF No. 131-1.

3. **Exhibit A** summarizes the hours worked and lodestar incurred by Honik LLC from inception of this Action through August 1, 2026. The hours are drawn from contemporaneous time records prepared and maintained in the ordinary course of business. Lodestar is calculated

using the firm's current hourly rates and excludes expenses. The firm reviewed its time records for accuracy, necessity, and reasonableness, and in the exercise of billing judgment and consistent with its standard practices, reduced certain time entries and the resulting lodestar.

4. The hours reported in this Declaration do not include time spent after August 1, 2026, including any work preparing this declaration or effectuating the Settlement after that date, preparing for, or attending the Final Approval Hearing, or administering the Settlement, if approved by the Court.

5. Honik LCC primarily represents clients on a contingency-fee basis. The billing rates listed in Paragraph 7 below are consistent with the rates the firm has submitted, and courts have approved in other class action cases, including lodestar cross-checks using the firm's then-prevailing rates. *See, e.g., In re: Valsartan, Losartan and Irbesartan Prods. Liab. Litig.*, No. 1:19-md-02875 (D.N.J. 2019); *Bradley v. Brookhaven Bor.*, No. 2:25-cv-00155 (E.D. Pa.); *Slattery v. Athena Cosmetics Inc.*, No. 2:23-cv-10078 (C.D. Cal.); and *Brodowicz v. Walmart, Inc.*, No. 0:21-cv-60643 (S.D. Fla.).

6. The services Honik LLC performed on behalf of the putative class include, among other things:

- Researching, investigating, preparing, and filing multiple class action complaints prior to the creation of this multi-district litigation;
- Preparing Plaintiffs' oppositions to Pfizer's motions to dismiss, and other pretrial motions, in individual class action complaints;
- Attending hearings and conferences in individual class action complaints;
- Preparing submissions made supporting the creation of this multi-district litigation, and appearing before the JPML panel concerning same;

- Coordinating plaintiff-side organization after the creation of this multi-district litigation, and participating in scheduling and other conferences before the Court;
- Preparing significant portions of Plaintiffs' opposition to Pfizer's motions to dismiss, and handling portions of oral argument concerning same;
- Drafting and revising written discovery requests;
- Reviewing and analyzing discovery produced by Pfizer;
- Coordinating Plaintiffs' responses to Pfizer's written discovery requests;
- Preparing and defending Consumer Plaintiffs' depositions;
- Identifying and working with multiple experts;
- Coordinating third-party discovery;
- Participating in meet-and-confer conferences and related correspondence regarding the scope of Plaintiffs' discovery, or the scope of Pfizer's discovery to Plaintiffs;
- Reviewing for relevance and privilege and producing Plaintiffs' discovery; and
- Preparing for and attending numerous mediation sessions both live and telephonic including extensive preparation of memoranda and data analyses.

7. Honik LLC devoted 1752.6 hours to this Action. The resulting lodestar is as follows:

Attorney	Total Hours	Current Rate	Lodestar
Ruben Honik	812	\$1,000	\$812,000.00
David J. Stanoch	940.6	\$750	\$705,450.00
Total	1752.6		\$1,517,450.00

8. A schedule of Honik LLC's expenses reasonably incurred in this Action and for which it seeks reimbursement is as follows. These expenses are billed separately and are not included in the firm's hourly rates. They do not include general overhead, and the firm has not added any surcharge to the amounts paid to the underlying vendors.

Expenditure Category	Amount
Filing Fees	\$5,628.00
PHV Applications	\$1,810.00
Service of Process	\$2,009.20
Postage	\$86.21
Travel for Conferences/ Hearings	\$1,789.29
Total	\$11,322.70

9. The firm believes the Court should approve the requested litigation expenses because the firm reasonably and necessarily incurred them in prosecuting this Action.

10. As reflected above, Honik LLC incurred a total of \$11,322.70 in expenses from the inception of this Action through August 1, 2026. The schedule is drawn from the firm's books and records, which are maintained in the ordinary course of business and supported by expense vouchers, check records, receipts, and other source documents.

11. The summary of expenses above does not include Honik LLC's contribution to the litigation fund established for this case and held by Scott+Scott Attorneys at Law LLP. The details of the expenses paid from the litigation fund are described in the Scott Declaration.

12. Honik LLC has extensive experience prosecuting consumer litigation and other complex class actions. Honik LLC's resume is attached hereto as **Exhibit A**.

13. Honik LLC was originally retained by most of the Consumer Plaintiffs since the inception of the first cases filed in this matter and subsequently was retained by the remainder of Consumer Plaintiffs after their prior firms withdrew from this multi-district litigation.

14. Honik LLC's earliest engagements began in or about mid-2021. Since engagement, each of the Class Representatives diligently expended time and effort to work with Class Counsel in this litigation. Each bore the risks involved in prosecuting this action. Each made themselves available to discuss factual, legal, and strategic matters; searched for and provided records and information pertinent to this case; participated in multiple in-person, telephonic, or video conferences during the pre-complaint investigation and discovery phases; and kept in regular contact during litigation and the settlement process. All of them responded to substantial written discovery requests propounded by Pfizer. Four of them, Kimberly Hill, Karen Duff, Valerie Hogue, and Lillian Forrest, were deposed. The remaining Consumer Plaintiffs were actively preparing for their depositions when this matter settled.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 28th day of August 2026, in Philadelphia, Pennsylvania.

A handwritten signature in black ink, appearing to read "Ruben Honik", written over a horizontal line.

Ruben Honik

Exhibit A



HONIK LLC

Firm Overview

About Us

Honik LLC is the culmination of more than 45 years of practicing law. A boutique litigation firm with a nationwide practice, Honik LLC specializes in class action, appellate and complex individual litigation in areas ranging from Antitrust Law, Consumer Protection, Pharmaceutical and other Product Litigation, Environmental and Mass Torts. Recognized as leaders in the field, Honik LLC attorneys have been Court appointed to leadership positions in some of the largest and most consequential MDLs in the United States.

Practice Areas

Consumer Class Action. People frequently purchase products or services which, unfortunately, turn out not to be what they were represented to be. And when aggrieved persons contact the manufacturer or seller, sometimes they will not do the right thing and make it right, leaving the consumer with no practical recourse.

Antitrust Litigation. Antitrust laws were enacted to protect U.S. consumers and businesses from anti-competitive and monopolistic conduct that threatens our free and open markets, the foundation of a vibrant economy. Fair competition is one thing, but unfair, predatory practices – such as competitors getting together to collectively raise prices, or a single large company

artificially controlling supply and demand – are prohibited by the antitrust laws.

Honik LLC's lawyers have significant experience in representing consumers and businesses seeking to curb anti-competitive business practices. This includes collusive settlements or arrangements between competitors, price-fixing, monopolistic or monopsonistic practices.

Pharmaceutical Litigation. Companies that make and sell pharmaceutical drugs and medical devices must ensure that the products they sell are safe and effective. Every year, however, manufacturers release products that are not only harmful, but also dangerous. This results in hundreds, if not thousands, of people being harmed due to dangerous prescription drugs, over-the-counter medicines or supplements, and medical devices. At the same time these same manufacturers profit at people's expense.

Products Liability. When you purchase a product, you believe the manufacturer, distributor, and seller took steps to ensure it works safely and as intended. But that is not always the case. Preventable injuries and deaths occur each year as a result of defective products. Flaws in the design, manufacture, marketing, or warnings of a product can and should be deterred, and injuries from them should be avoided and are compensable. This includes defects or defective warnings associated with a number of products, including machinery, household items, vehicles, drugs and medical devices, and more.

Toxic Tort / Environmental Litigation. Releasing a toxic substance into the environment or workplace can expose thousands of innocent people to serious and potentially deadly medical conditions in a single incident. Exposure to hazardous chemicals and other toxins can arrive through the air, soil or water supply; it can occur in your home, workplace or neighborhood. Contamination can impact an individual, a family or an entire community. Honik LLC's lawyers have extensive experience in environmental and

chemical exposure, including beryllium exposure, lead paint poisoning, sulfur dioxide and trioxide, and more.

Medical Malpractice. Medical professionals are held to a high standard of care. Sadly, the reality is that many doctors, nurses, and other healthcare providers fall short of these expectations, and their negligence injures the very patients they have a duty to protect. Nearly 200,000 people die each year due to preventable medical errors. This makes medical negligence the third leading cause of death in the United States. Honik LLC's lawyers have recovered millions of dollars for our clients. We have decades of experience representing medical malpractice victims against hospitals, surgeons, nursing homes, and other healthcare providers who have deviated from acceptable standards of care.

Personal Injury / Catastrophic. Honik LLC represents individuals and families in complex, catastrophic injury cases ranging from automobile and highway design cases, workplace and machine injuries, premises liability and construction accidents. Unsurpassed results in these cases have resulted in lawyer referrals of the most difficult and complex cases for decades.

Business Litigation. Businesses often find that larger rival or suppliers unfairly leverage their size and resources to economically harm them, and in turn their customers. This conduct ranges from abuse of a dominant market position to misleading product superiority or quality claims (e.g., Lanham Act violations) that give a rival an unfair advantage in the marketplace. Our lawyers are experienced in representing businesses, both big and small, against rivals who refuse to play fairly in the marketplace.

Founder and Managing Partner



Ruben Honik. Ruben Honik immigrated to the United States more than 50 years ago speaking not a word of English. He became the first member of his family to attend college and, subsequently, to obtain a professional degree. In the four decades since earning his law degree, Mr. Honik has achieved an extraordinary record of professional accomplishment, including the accolades and recognition of many from the civil trial bar, without ever forgetting, or straying very far from, his immigrant and working-class roots.

In cases spanning from environmental disasters to insurance and financial services fraud, from civil rights to product design defects, and from professional malpractice to mass torts, Mr. Honik has earned for his clients more than one billion dollars in verdicts and settlements over his distinguished career. No less importantly, his appellate advocacy has changed the law in numerous respects to help the victim and those most in need of access to our civil courts. This record of accomplishment has earned him the title of Super Lawyer in the areas of class action, mass torts and environmental law.

Mr. Honik's body of work, and his lifelong commitment to the ideals of justice and service, allowed him to be elected President of the Philadelphia Trial Lawyers Association (1997-98) and the Pennsylvania Trial Lawyers Association (2007-08, now the Pennsylvania Association for Justice) with which he remains actively involved. He is the longtime Editor of *The Verdict*,

the monthly newsletter of the Philadelphia Trial Lawyers Association, and is a frequent lecturer and writer in his areas of practice.

Mr. Honik graduated from Syracuse University in 1977 and earned his law degree from Rutgers University in 1980. He is admitted to practice before the U.S. Supreme Court, the First, Third, Fifth and Eleventh Circuit Courts of Appeal, and the Supreme Courts of Pennsylvania and New Jersey.

Mr. Honik is the father of two adult daughters and sons-in-law, and the grandfather to two grandsons. He was a founder of Congregation Kol Ami in Elkins Park, Pa. where he served as President, and is a current member of the Board of the American Association for Justice (AAJ), the former Association of Trial Lawyers of America (ATLA). A lifelong runner with six completed marathons under his belt, Mr. Honik resides in the Wissahickon Valley section of Philadelphia.

Representative cases and leadership appointments (lead, co-lead, executive, or steering committees) include:

- *In re Chantix (Varenicline) Marketing, Sales Practices, and Products Liability Litigation (No. II)*, No. 22-md-3050 (S.D.N.Y.)
- *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*, No. 1:18-md-2875 (D.N.J.)
- *In re Metformin Marketing and Sales Practices Litigation*, No. 2:20-cv-02324 (D.N.J.)
- *Nixon v. Grande Cosmetics LLC*, No. 1:22-cv-6639 (D.N.J.);
- *Brodowicz v. Virgin Scent, Inc. d/b/a Artnaturals, Inc.*, No. 0:21-cv-60643 (S.D. Fla.)
- *In re Intuniv Antitrust Litigation*, No. 16-cv-12653 (D. Mass.)
- *In re Fresenius Granuflo / Naturalyte Dialysate Products Liability Litigation*, No. 13-md-2428 (D. Mass.)

- *Cullen et al. v. Whitman Medical Corporation d/b/a Whitman Education Group, Inc., et al.*, 197 F.R.D. 136 (E.D. Pa.)
- *In re Budeprion XL Marketing & Sales Litigation*, MDL No. 2107 (E.D. Pa.)
- *In re Checking Account Overdraft Litigation*, MDL No. 2036 (2009)
- *Mattel Lead Paint Class Action*, MDL No. 1897 (E.D. Pa.)
- *David v. American Suzuki Motor Corp.*, No. 08-CV-22278 (S.D. Fla.)
- *Barba, et al. v. Shire US, Inc., et al.*, No. 11-cv-21158 (S.D. Fla.)