

**If you purchased one or more of the Named Generic Drugs listed in Appendix A to this Notice directly from any of the pharmaceutical manufacturer Defendants or former Defendants (listed in Appendix B to this Notice) at any time from May 1, 2009 until December 31, 2019, you could get a payment from class action settlements.**

*A federal court authorized this notice. This is not a solicitation from a lawyer.*

You were previously sent a notice about settlements with Sun Pharmaceuticals Industries, Inc (“Sun”) and Taro Pharmaceuticals U.S.A. Inc. (“Taro”). The purpose of this notice is to alert you of three proposed additional settlements in a Lawsuit brought by Direct Purchasers (“Settling Direct Purchaser Plaintiffs” or “DPPs”) of certain generic drugs (the “Named Generic Drugs”). The Lawsuit is a group of direct purchaser class actions coordinated under the civil docket *In re Generic Pharmaceuticals Pricing Antitrust Litigation*, Case No. 2:16-MD-02724 (E.D. Pa.). The Lawsuit claims that generic drug manufacturers violated antitrust laws, harming competition and causing Settlement Class Members to overpay for the Named Generic Drugs. The Settling Defendants deny liability as alleged in the Lawsuit. The Court has not decided who is right. No trial has been held.

- Three additional settlements have been reached between the DPPs and the Settling Defendants: (1) a proposed settlement with Breckenridge Corp.; (2) a proposed settlement with Apotex Corp.; and (3) a proposed settlement with Heritage Pharmaceuticals Inc. (Heritage), Emcure Pharmaceuticals Ltd., (Emcure), and Satish Mehta (Mehta) (together, the “Settlements”). Settling Defendants, other than Emcure and Mehta, are alleged to have violated the antitrust laws relating to the sale of the Named Generic Drugs. The proposed settlements do not resolve any of the claims of the Settlement Class against the remaining Defendants. The Lawsuit against the remaining Defendants is ongoing. The Named Generic Drugs are listed in Appendix A, and the Current and Former defendants are listed in Appendix B.
- The Court has certified three Settlement Classes, one for each proposed Settlement: (1) the Breckenridge Settlement Class; (2) the Apotex Settlement Class; and (3) the Heritage Settlement Class. The three Settlement Classes are each comprised of:

All persons or entities, and their successors and assigns, that directly purchased one or more of the Named Generic Drugs from one or more Current or Former Defendants in the United States and its territories and possessions, at any time during the period from May 1, 2009 until December 31, 2019.

Excluded from the Settlement Class are Current and Former Defendants and their present and former officers, directors, management, employees, subsidiaries, or affiliates, judicial officers and their personnel, and all governmental entities.

- The Court has preliminarily approved the three proposed Settlements between the Settling Direct Purchaser Plaintiffs and Settling Defendants. To resolve the DPPs' claims against Settling Defendants, the proposed Settlements will provide for the following payments by Settling Defendants: (1) \$5,000,000.00 payment by Breckenridge Corp.; (2) \$30,000,000.00 payment by Apotex Corp; and (3) \$10,000,000.00 payment by Emcure Pharmaceuticals Ltd., on behalf of Heritage and Mehta. These payments, collectively \$45,000,000.00, will comprise the "Settlement Fund." The Settlement Fund may be reduced by up to \$4,245,000.00 or increased to a maximum of \$55,735,294.10 under certain circumstances as explained in the Settlement Agreements. As discussed below, expenses and service awards, as well as a set-aside for a future request for attorneys' fees, may be deducted from these amounts, with Court approval.
- The Court has scheduled a hearing to decide whether to approve each of the three Settlements, the plan for allocating the Settlement Fund to Settlement Class Members, any requests by the DPPs' attorneys for reimbursement of expenses out of the Settlement Fund and for the payment of service awards to the Settling Plaintiffs, and any request by the DPPs' attorneys for a set-aside of up to one-third of the Settlement Fund for a future request for attorneys' fees (the "Final Fairness Hearing"). The Final Fairness Hearing is scheduled for September 23rd, 2024, at 11:00 a.m. EST, before Judge Cynthia M. Rufe at the United States District Court for the Eastern District of Pennsylvania, Courtroom 12-A, 601 Market Street, Philadelphia, PA 19106.

**YOUR LEGAL RIGHTS ARE AFFECTED WHETHER YOU ACT OR DO NOT ACT,  
SO PLEASE READ THIS NOTICE CAREFULLY.**

**YOUR LEGAL RIGHTS AND OPTIONS IN THESE SETTLEMENTS**

<p><b>WHEN YOU RECEIVE A CLAIM FORM, PROMPTLY COMPLETE AND RETURN IT</b></p>	<p>You do not need to do anything now to retain your right to stay in the Settlement Classes and/or seek a share of the proposed Settlements. If the Court decides to give the proposed Settlements Final Approval and you are a Settlement Class Member in any of the Settlement Classes, then you will need to complete, sign, and return a Claim Form to obtain a share of the proposed Settlement(s).</p> <p>If you received a Notice in the mail, a Claim Form will be mailed to you at a later date. You may be asked to provide data showing your eligible purchases.</p> <p>If you <u>did not</u> receive a Notice in the mail and you think you are a potential Settlement Class Member, please identify yourself by letter or email to the following address: <i>In re: Generic Pharmaceuticals Pricing Antitrust Litigation</i> – Direct Purchasers, c/o A.B. Data, Ltd., P.O. Box 173095, Milwaukee, WI 53217.</p> <p>Email: <a href="mailto:info@GenericDrugsDirectPurchaserSettlement.com">info@GenericDrugsDirectPurchaserSettlement.com</a>.</p> <p>You will be asked to provide information or data proving that you are a member of a Settlement Class. You also may be asked to provide data showing your eligible purchases.</p>
<p><b>EXCLUDE YOURSELF FROM THE SETTLEMENT CLASS</b></p>	<p>You may choose to exclude yourself, or “opt out,” from any of the three Settlement Classes. If you decide to exclude yourself from a Settlement, you will not be bound by any decision in this Lawsuit relating to that Settling Defendant. If you choose to exclude yourself from all three Settlements, you will not be bound by any decision in this lawsuit relating to any of the Settling Defendants. This is the only option that allows you to ever be part of any lawsuit (other than this Lawsuit) against the Settling Defendants relating to the legal claims against the Settling Defendants in this case.</p>
<p><b>STAY IN THE LAWSUIT BUT OBJECT TO THE SETTLEMENTS</b></p>	<p>If you object to all or any part of the proposed Settlements, you may write to the Court about why you do not like the proposed Settlements.</p>
<p><b>GET MORE INFORMATION</b></p>	<p>If you would like to obtain more information about the Lawsuit or the Settlements, you can send questions to the lawyers or Claims Administrator identified in this notice and/or ask to attend the hearing at which the Court will evaluate the proposed Settlements.</p>

*These rights and options – and the deadlines to exercise them – are explained in this notice.*

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## BASIC INFORMATION

### 1. WHY DID I GET THIS NOTICE?

You received this notice because, according to available data and documents, you may have purchased one or more Named Generic Drugs directly from one or more generic manufacturer Defendants at some time from May 1, 2009 until December 31, 2019, and therefore you may be a member of the Settlement Classes that were certified by the Court for purposes of the proposed Settlements. You may have received this Notice in error and so you should confirm from your own records that you purchased one or more Named Generic Drugs directly from one or more generic manufacturer Defendants at some time from May 1, 2009 to December 31, 2019.

### 2. WHAT IS THIS LAWSUIT ABOUT?

The Lawsuit is a group of proposed class actions coordinated under the docket *In re Generic Pharmaceuticals Pricing Antitrust Litigation*, Case No. 2:16-MD-02724. DPPs' class action complaints are available at [www.GenericDrugsDirectPurchaserSettlement.com](http://www.GenericDrugsDirectPurchaserSettlement.com). Judge Cynthia M. Rufe, of the United States District Court for the Eastern District of Pennsylvania (the "Court"), is overseeing the Lawsuit and the Settlements.

The Settling Direct Purchaser Plaintiffs allege that Defendants engaged in an unlawful scheme or schemes to fix, maintain, and stabilize prices, rig bids, and engage in market and customer allocation of the Named Generic Drugs in violation of federal antitrust laws. DPPs allege that this harmed competition and caused Settlement Class Members to overpay for the Named Generic Drugs.

All Defendants, including the Settling Defendants, deny that any Settlement Class Member is entitled to damages or other relief. All Defendants, including the Settling Defendants, deny liability as to DPPs' claims. The Settlements between Settling Direct Purchaser Plaintiffs and the Settling Defendants is not an admission of wrongdoing by any Defendant, including the Settling Defendants.

Following investigation of relevant facts, substantial fact discovery, and following arms' length negotiations with the Settling Defendants, the Settling Direct Purchaser Plaintiffs, on behalf of the Settlement Classes, entered into the Settlements with the Settling Defendants.

There has been no determination by the Court or a jury that the allegations against the Defendants or Settling Defendants have been proven or that, if proven, the conduct caused harm to any Settlement Class Members. No trial has been held or scheduled.

### 3. WHAT IS A CLASS ACTION?

In a class action, one or more people called "Class Representatives" (in this case, César Castillo, LLC, FWK Holdings, LLC, Rochester Drug Cooperative, Inc., and KPH Healthcare Services, Inc.) sue on behalf of others who have similar claims (collectively, the "DPPs" or the "Settling Direct Purchaser Plaintiffs").

The DPPs and the entities on whose behalf they have sued together constitute the "Settlement Classes" or "Settlement Class Members." Their attorneys are called "Settlement Class Counsel."

The companies that have been sued are called the "Defendants." In this case the Current and Former Defendants are the 58 companies listed at the end of this Notice.

In a class action lawsuit, one court resolves the issues for all Class Members, except for those who exclude themselves (*i.e.*, “opt out”) from the Class. The Court, by orders dated February 13, 2024, has determined that the lawsuit between DPPs and the Settling Defendants can proceed as a class action for purposes of settlement. A copy of the Court’s orders may be found at [www.GenericDrugsDirectPurchaserSettlement.com](http://www.GenericDrugsDirectPurchaserSettlement.com).

Specifically, the Court has found that:

- The number of Settlement Class Members is so numerous that joining them all into one suit is impracticable.
- Members of the Settlement Classes share common legal or factual issues relating to the claims in this case.
- The claims of the DPPs are typical of the claims of the rest of the Settlement Classes.
- The DPPs and Settlement Class Counsel will fairly and adequately protect the interests of the Settlement Classes.
- The common legal questions and facts predominate over questions affecting only individual members of the Settlement Classes, and this Lawsuit will be more efficient than individual lawsuits.

#### 4. WHY ARE THERE SETTLEMENTS?

The Court has not decided in favor of the Settling Direct Purchaser Plaintiffs or Settling Defendants. Instead, both sides have agreed to the Settlements. Settling Direct Purchaser Plaintiffs and the Settling Defendants were preparing to proceed with the litigation and eventually go to trial, but they have now agreed to the three proposed Settlements. By agreeing to these Settlements, the parties avoid the costs and uncertainty of additional discovery, motion practice, and an eventual trial, and if the Settlements are approved by the Court, Settlement Class Members will be eligible to receive a payment from these three Settlements. The Settlements do not mean that any law was broken or that the Settling Defendants did anything wrong. The DPPs and Settlement Class Counsel believe that the proposed Settlements are fair, reasonable, and adequate and in the best interests of the Settlement Classes.

### WHO IS IN THE SETTLEMENT CLASS AND SETTLEMENTS

#### 5. AM I PART OF THE SETTLEMENT CLASSES AND THE SETTLEMENTS?

You are part of the Settlement Class if you are a person or entity in the United States and its territories that purchased one or more Named Generic Drugs directly from one or more Current or Former Defendants at any time from May 1, 2009 until December 31, 2019.

More specifically, on February 13, 2024, the Court certified three Settlement Classes: (1) the Breckenridge Settlement Class; (2) the Apotex Settlement Class; and (3) the Heritage Settlement Class. The class definition for each of these Settlement Classes is the same:

All persons or entities, and their successors and assigns, that directly purchased one or more of the Named Generic Drugs from one or more Current or Former Defendants in the United States and its territories and possessions, at any time during the period from May 1, 2009 until December 31, 2019.

Excluded from the Settlement Class are Current and Former Defendants and their present and former officers, directors, management, employees, subsidiaries, or affiliates, judicial officers and their personnel, and all governmental entities.

The Named Generic Drugs and Current and Former Defendants are listed at the end of this Notice.

If you are not sure whether you are included in these Settlement Classes, you may call or write to the lawyers in this case at the telephone numbers or addresses listed in Question 11 below. If you wish to exclude yourself from one or more of these Settlement Classes, please refer to Question 6.

## 6. CAN I REQUEST TO BE EXCLUDED FROM THE SETTLEMENT CLASSES?

Yes, the Court has set a deadline for requests for exclusion for June 27, 2024. To exclude yourself, you must send a letter via first-class U.S. mail saying you want to exclude yourself from the Direct Purchaser Lawsuit in *In re: Generic Pharmaceuticals Pricing Antitrust Litigation*, Case No. 2:16-MD-02724 (E.D. Pa.). **You must identify which Settlement Class you wish to be excluded from. You may exclude yourself from one, two, or all three Settlement Classes.**

Mail the letter to: *In re: Generic Pharmaceuticals Pricing Antitrust Litigation* – Direct Purchasers, c/o A.B. Data, Ltd., P.O. Box 173095, Milwaukee, WI 53217.

Be sure to include your name, address, email address, telephone number, and your signature. Your letter requesting exclusion must be postmarked no later than June 27, 2024.

If you exclude yourself from a Settlement Class, you will not be legally bound by anything that happens in the lawsuit between DPPs and that Settling Defendant. This means that you may be able to sue (or continue to sue) that Settling Defendant in the future about the legal issues in this case. If you exclude yourself from all three Settlement Classes, you will not be legally bound by anything that happens in the lawsuit between DPPs and any of the Settling Defendants. If you exclude yourself from one or more of the Settlement Classes so that you can start or continue your own lawsuit against one or more of the Settling Defendants, you should talk to your own lawyer immediately because your claims will be subject to a statute of limitations, which means that your claims will expire if you do not take timely action. You need to contact your own lawyer about this issue.

If you do not exclude yourself from one or more of the Settlement Classes, and you have a valid claim, you can share in the Settlements, but you will not be able to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Settling Defendants arising from the claims released as part of these Settlements, including claims brought in the case between DPPs and the Settling Defendants. All of the Court's orders in the case between DPPs and the Settling Defendants will apply to you and legally bind you. You will also be bound by the proposed Settlements between DPPs and the Settling Defendants if the Court grants Final Approval to the proposed Settlements and enters final judgment in the case between the DPPs and the Settling Defendants.

## 7. WHAT HAPPENS IF I DO NOTHING?

If you are a Settlement Class Member and you do nothing, you will remain in the Settlement Classes and be eligible to participate in the Settlements as described in this notice, if the Settlements are approved. However, you will need to complete, sign, and return the claim forms (once they are sent to you) in order to obtain a payment. We do not know when the claim forms

will be mailed. You should check [www.GenericDrugsDirectPurchaserSettlement.com](http://www.GenericDrugsDirectPurchaserSettlement.com) for information regarding timing. The website will also have a blank claim form for downloading.

## THE SETTLEMENTS' BENEFITS

### 8. WHAT DO THE SETTLEMENTS PROVIDE?

The Settling Defendants have agreed to pay a total of \$45,000,000.00 in cash (which may be reduced to \$40,755,000.00 or increased to as much as \$55,735,294.10 under certain circumstances as explained in the Settlements) to an interest-bearing escrow account ("Settlement Fund") for the benefit of the Settlement Classes. This will come in the form of a \$5,000,000.00 payment from Breckenridge Corp., a \$30,000,000.00 payment from Apotex Corp., and a \$10,000,000.00 payment from Emcure, Heritage, and Mehta. The Settlement Fund shall be held in escrow pending finality of the Settlement Agreements. The Settling Defendants have also agreed to provide substantial cooperation to the DPPs in the continued litigation against the remaining Defendants.

Settlement Class Counsel will apply to the Court from the three Settlements no later than May 13, 2024 for reimbursement of past unreimbursed expenses and for future expenses not to exceed a total of \$4.5 million, and service awards to the four Settling Plaintiffs of \$20,000 each for their services to the Settlement Classes. The Settlements also provide for payment of up to \$450,000 in total for the costs of administering the Settlements and making distributions from the fund. In addition, Settlement Class Counsel will ask the Court to set aside one-third of the Settlement Fund plus a proportionate amount of interest into an escrow account for future requests for payment of attorneys' fees. For purposes of the objection and opt-out deadline of June 27, 2024, all motions for expenses, service awards, and a set-aside for a future request for attorneys' fees shall be posted on the settlement website: [www.GenericDrugsDirectPurchaserSettlement.com](http://www.GenericDrugsDirectPurchaserSettlement.com).

If approved by the Court, the Settlement Fund, minus any court-awarded expenses to Settlement Class Counsel, set-aside for a future request for attorneys' fees, costs of settlement notice and administration, and service awards to Settling Plaintiffs ("Net Settlement Fund") will be distributed to the Settlement Class Members who return valid and timely Claim Forms. The distribution will be made on a *pro rata* basis, consistent with each Settlement Class Member's aggregate weighted share of total Settlement Classes' purchases of the Named Generic Drugs from Defendants. In the event that data from Defendants is not available to calculate a Settlement Class Member's *pro rata* share, such Settlement Class Member will be required to submit data showing its relevant direct purchases as requested by the Claims Administrator. As a general matter, a claimant's *pro rata* share will be based on data from Defendants, and claimants will not be permitted to submit their own purchase data to contest these figures. This is because of the time and expense that would be involved in analyzing such additional data (expenses that would be paid out of the Settlement Fund itself), and because transaction data from Defendants is considered reliable. More information about how Settlement Class Members' shares will be calculated is available in the Plan of Allocation, on the settlement website: [www.GenericDrugsDirectPurchaserSettlement.com](http://www.GenericDrugsDirectPurchaserSettlement.com).

In exchange, the litigation between the DPPs and the Settling Defendants will be dismissed with prejudice and Settling Defendants will be released by Settlement Class Members from all claims that have been brought or could have been brought concerning the subject matter of or acts, omissions, or other conduct alleged in Settling Direct Purchaser Plaintiffs' class action complaints available at [www.GenericDrugsDirectPurchaserSettlement.com](http://www.GenericDrugsDirectPurchaserSettlement.com).

Non-Settling Defendants are **not** part of the proposed Settlements between the DPPs and the Settling Defendants. DPPs' Lawsuit against the Non-Settling Defendants is continuing.

The Settlement Agreements provide that they may be terminated if, for example, the Court does not approve the Settlements or if Settlement Class Members with aggregate purchases above a certain amount opt out. If the Settlement Agreements are terminated, the Lawsuit will proceed against the Settling Defendants as if settlements had not been reached.

The full text of the Settlement Agreements, including the releases, are available at [www.GenericDrugsDirectPurchaserSettlement.com](http://www.GenericDrugsDirectPurchaserSettlement.com). This notice is not meant to, and does not, alter the terms of the actual Settlement Agreements and associated releases.

## 9. HOW CAN I GET A PAYMENT FROM THE SETTLEMENTS?

If the Court grants Final Approval to the Settlements (*see* "The Court's Fairness Hearing" below) and any resulting appeals are resolved, the Court will approve a Plan of Allocation to distribute the Settlement Fund.

**If you do not exclude yourself from all three Settlement Classes, you will need to submit a Claim Form to request your share of the Net Settlement Fund.**

- If you received this Notice in the mail, a Claim Form will be sent to you automatically and you do not need to do anything at this time to be eligible to receive a payment from the Settlements. However, you will be required to submit data showing your eligible purchases if such data is not available from Defendants.
- If you did not receive this Notice in the mail, and you think you are a potential Settlement Class Member, please identify yourself or your company by letter or email to the following address: *In re: Generic Pharmaceuticals Pricing Antitrust Litigation* – Direct Purchasers, c/o A.B. Data, Ltd., P.O. Box 173095, Milwaukee, WI 53217. Email: [info@GenericDrugsDirectPurchaserSettlement.com](mailto:info@GenericDrugsDirectPurchaserSettlement.com). You must also include proof that you purchased at least one of the Named Generic Drugs during the period May 1, 2009 to December 31, 2019 directly from a Current or Former Defendant. You may also be required to submit your purchase data showing all your eligible purchases. A copy of the Claim Form will also be available at [www.GenericDrugsDirectPurchaserSettlement.com](http://www.GenericDrugsDirectPurchaserSettlement.com).

## 10. WHEN WOULD I GET MY PAYMENT AND HOW MUCH WOULD IT BE?

When you get your payment depends on several matters, including whether and when the Court grants Final Approval of the Settlements. The Net Settlement Fund will be allocated to Settlement Class Members as soon as possible after the Court grants Final Approval of the Settlements.

You will not be responsible for calculating the amount you may be entitled to receive. The Plan of Allocation provides that you will be paid on a *pro rata* basis in proportion to how much of the Named Generic Drugs you purchased directly from Current or Former Defendants from May 1, 2009 through December 31, 2019. Generally, those with more purchases will get a higher recovery. If less than 100% of the Settlement Classes send in claim forms, you could get a larger *pro rata* share. All Claimants who would receive less than a *pro rata* share of \$25 total from the three Settlements will receive \$25 total from the three Settlements.

If the proposed Settlements are given Final Approval, but there is an appeal of the Final Approval, the appeal could take several years to resolve. Any accrued interest on the Settlement Fund will be included, *pro rata*, in the amount paid to Settlement Class Members.

If you do decide to exclude yourself from one or more of the Settlement Classes, which means that you are choosing not to be a part of one or more of the Settlement Classes, then you will not receive a share of that Settlement Class's portion of the Settlement Fund.

## THE LAWYERS REPRESENTING THE CLASS

### 11. DO I HAVE A LAWYER IN THIS CASE?

The Court appointed the counsel listed below as Settlement Class Counsel:

Dianne M. Nast, Esq. Joseph N. Roda, Esq. NASTLAW LLC 1101 Market Street, Suite 2801 Philadelphia, PA 19107 (215) 923-9300 dnast@nastlaw.com jnroda@nastlaw.com	David F. Sorensen, Esq. BERGER MONTAGUE PC 1818 Market Street, Suite 3600 Philadelphia, PA 19103 (215) 875-3000 dsorensen@bm.net
Robert N. Kaplan KAPLAN FOX & KILSHEIMER LLP 800 Third Avenue, 38 <sup>th</sup> Floor New York, NY 10022 (212) 687-1980 rkaplan@kaplanfox.com	Thomas M. Sobol, Esq. HAGENS BERMAN SOBOL SHAPIRO LLP 1 Faneuil Hall Square, 5 <sup>th</sup> Floor Boston, MA 02109 (617) 482-3700 tom@hbsslaw.com
Linda P. Nussbaum NUSSBAUM LAW GROUP, PC 1133 Avenue of the Americas, 31st Floor New York, NY 10036 (917) 438-9189 lnussbaum@nussbaumpc.com	Michael L. Roberts ROBERTS LAW FIRM P.A. 1920 McKinney Ave., Suite 700 Dallas, TX 75201 (501) 821-5575 mikeroberts@robertslawfirm.us

### 12. HOW WILL THE LAWYERS BE PAID?

The attorneys are asking the Court to set aside up to one-third of the Settlement Fund plus a proportionate amount of interest from these three settlements for future requests for attorneys' fees. Settlement Class Counsel will also ask now, as part of the Final Approval of these settlements, for an amount not to exceed a total of \$4.5 million for reimbursement of past and future expenses, including costs of administering these settlements, plus service awards in the amount of \$20,000 for each of the four named plaintiffs. If you decide not to exclude yourself from the Settlement Class, you will not have to pay these fees, costs, and expenses out of your own pocket. If the Court grants Settlement Class Counsel's requests, these amounts would be deducted from the Settlement Fund.

Any application by Settlement Class Counsel for reimbursement of expenses, service awards, and a set-aside for a future request for attorneys' fees will be filed with the Court and made available for download and/or viewing on or before August 12, 2024, on [www.GenericDrugsDirectPurchaserSettlement.com](http://www.GenericDrugsDirectPurchaserSettlement.com), as well as at the office of the Clerk of the United States District Court for the Eastern District of Pennsylvania, 601 Market Street, Philadelphia, PA 19106-1797, during normal business hours.

## OBJECTING TO THE SETTLEMENTS

### 13. HOW DO I TELL THE COURT THAT I DON'T LIKE THE SETTLEMENTS?

If you are a Settlement Class Member (and have not excluded yourself), you can object to all or any part of the proposed Settlements and/or the application for a set-aside for a future request for attorneys' fees, reimbursement of costs and expenses, and/or service awards to the Class Representatives. You can give reasons why you think the Court should not approve it. The Court will consider your views.

To object to the Settlements, you must send a letter via first-class U.S. mail saying that you object to the Settlements in the Direct Purchaser Lawsuit in *In re Generic Pharmaceuticals Pricing Antitrust Litigation*, No. 2:16-MD-02724 (E.D. Pa.) with the following information:

- Your name, address, and phone number and the name, address, and phone number of your attorney, if you have one.
- Your signature.
- Case name and number:

*In re Generic Pharmaceuticals Pricing Antitrust Litigation*  
Case No. 2:16-MD-02724

United States District Court for the Eastern District of Pennsylvania

- The specific reasons why you object to the settlement or any part of it.
- All documents or writings that you want the Court to consider.

Mail the objection to the Clerk of the United States District Court for the Eastern District of Pennsylvania (address below) with copies to the individuals and addresses listed below:

CLERK OF THE COURT	SETTLEMENT CLASS COUNSEL	SETTLING DEFENDANTS' COUNSEL
<p>Clerk of Court, EDPA 601 Market Street Philadelphia, PA 19106</p>	<p>Dianne M. Nast Joseph N. Roda NastLaw LLC 1101 Market Street, Ste. 2801 Philadelphia, PA 19107</p>	<p>Heather Lamberg Jeffrey Kessler Freshfields Bruckhaus Deringer US LLP 700 13<sup>th</sup> Street, NW 10<sup>th</sup> Floor Washington, D.C. 20005</p> <p>Steven F. Cherry April N. Williams WilmerHale 2100 Pennsylvania Avenue NW Washington, D.C. 20037</p> <p>James W. Matthews Foley &amp; Lardner LLP 111 Huntington Avenue Suite 2500 Boston, MA 02199</p> <p>Elizabeth A. N. Haas Foley &amp; Lardner LLP 777 E. Wisconsin Avenue Milwaukee, WI 53202</p> <p>Edward B. Schwartz Reed Smith LLP 1301 K Street, N.W. Suite 1000, East Tower Washington, D.C. 20005- 3373</p>

**Your objection must be postmarked on or before June 27, 2024.**

### **THE COURT'S FAIRNESS HEARING**

The Court will hold a hearing to decide whether to grant Final Approval to the Settlements and any requests for reimbursement of expenses, service awards, and a set-aside for a future request for attorneys' fees ("Fairness Hearing"). You may attend and, if you have not excluded yourself from one or more the Settlement Classes, you may ask to speak, but you do not have to.

**14. WHEN WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENTS?**

The Court has scheduled a Fairness Hearing on September 23rd, 2024, at the United States District Court for the Eastern District of Pennsylvania, Courtroom 12-A, 601 Market Street, Philadelphia, PA 19106.

**The time and date of the Fairness Hearing may change without additional mailed notice. For updated information on the hearing, you may check [www.GenericDrugsDirectPurchaserSettlement.com](http://www.GenericDrugsDirectPurchaserSettlement.com), or the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://pcl.uscourts.gov>.**

At the Fairness Hearing, the Court will consider whether the Settlements are fair, reasonable, and adequate. The Court may also consider the requests by Settlement Class Counsel for a set-aside for a future request for attorneys' fees, as well as requests for reimbursement of expenses, and payment of service awards. If there are objections, the Court will consider them at that time. After the hearing, the Court will decide whether to give Final Approval to the Settlements and the other requests. It is unknown how long these decisions will take.

Any judgment issued by the Court will be binding on the Settlement Classes. The Settlements, if approved by the Court and once appeals, if any, are resolved, will release all claims in the class action against the Settling Defendants.

#### 15. DO I HAVE TO ATTEND THE HEARING?

No. Settlement Class Counsel will answer any questions the Court may have. However, you are welcome to attend the hearing at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you mailed your written objection on time, to the proper addresses, and it complies with the other requirements provided above, the Court will consider it. You also may pay your own lawyer to attend the hearing, but this is not necessary. Attendance is not necessary to receive your share of the Net Settlement Fund.

#### 16. MAY I SPEAK AT THE HEARING?

You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter via first-class U.S. mail saying that it is your "Notice of Intention to Appear in *In re: Generic Pharmaceuticals Pricing Antitrust Litigation*, No. 2:16-MD-02724 (E.D. Pa.)." Be sure to include your name, address, email address, telephone number, and your signature. Your Notice of Intention to Appear must be postmarked no later than June 27, 2024, and must be sent to the Clerk of the Court, to Settlement Class Counsel, and to Settling Defendants' Counsel at the addresses listed in Question 13 above.

You may not speak at the hearing if you excluded yourself as a Settlement Class Member or do not send a notice of intention to appear.

### GETTING MORE INFORMATION

#### 17. HOW DO I GET MORE INFORMATION?

If you have questions about this case or want additional information, you may call or write to the lawyers listed in the answer to Question 11 above, call 877-315-0583, or visit [www.GenericDrugsDirectPurchaserSettlement.com](http://www.GenericDrugsDirectPurchaserSettlement.com). This notice is only a summary of the proposed Settlements and is qualified in its entirety by the terms of the Settlement Agreements. Copies of the Settlement Agreements are on public file with the United States District Court for the Eastern District of Pennsylvania, 601 Market Street, Philadelphia, PA 19106. The Settlement

Agreements are also available on the settlement website: [www.GenericDrugsDirectPurchaserSettlement.com](http://www.GenericDrugsDirectPurchaserSettlement.com). You may also call the Claims Administrator at 877-315-0583 with questions.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THE SETTLEMENTS OR THE CLAIMS PROCESS.