

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: GENERIC PHARMACEUTICALS
PRICING ANTITRUST LITIGATION

MDL No. 2724
Case No. 2:16-MD-2724

THIS DOCUMENT RELATES TO:

Direct Purchaser Plaintiffs' Actions

HON. CYNTHIA M. RUFE

**NOTICE OF FILING CORRECTED MOTION REGARDING
DPPS' SETTLEMENT WITH GLENMARK**

Direct Purchaser Plaintiffs ("DPPs") provide notice of filing the attached corrected Motion to replace the Motion (MDL Doc. No. 3593) that DPPs filed on August 18, 2025. Paragraph 2 of the Motion filed on August 18, 2025 contained a typographical error concerning Settling Defendant Glenmark Pharmaceutical Inc., USA. The attached corrected Motion eliminates the typographic error in Paragraph 2 and provides citations to the materials in support of the Motion that DPPs filed on August 18, 2025. *See* MDL Doc. Nos. 3593-1-7. DPPs have made no other changes.

Accordingly, DPPs provide notice to the Court and the Parties to filing this corrected document.

Dated: August 29, 2025

Respectfully submitted,



Dianne M. Nast
NASTLAW LLC
1101 Market Street, Suite 2801
Philadelphia, Pennsylvania 19107
(215) 923-9300
dnast@nastlaw.com

Lead and Liaison Counsel

for Direct Purchaser Plaintiffs

David F. Sorensen
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, Pennsylvania 19103
(215) 875-3000
dsorensen@bm.net

Thomas M. Sobol
HAGENS BERMAN SOBOL SHAPIRO LLP
1 Faneuil Hall Sq., 5th Floor
Boston, Massachusetts 02109
(617) 482-3700
tom@hbsslaw.com

Robert N. Kaplan
KAPLAN FOX & KILSHEIMER LLP
800 Third Avenue, 38th Floor
New York, New York 10022
(212) 687-1980
rkaplan@kaplanfox.com

Linda P. Nussbaum
NUSSBAUM LAW GROUP, PC
1133 Avenue of the Americas, 31st Floor
New York, New York 10036
(917) 438-9189
lnussbaum@nussbaumpc.com

Michael L. Roberts
ROBERTS LAW FIRM US, PC
1920 McKinney Ave., Suite 700
Dallas, Texas 75201
(501) 821-5575
mikeroberts@robertslawfirm.us

Direct Purchaser Plaintiffs' Steering Committee

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: GENERIC PHARMACEUTICALS
PRICING ANTITRUST LITIGATION**

**MDL No. 2724
Case No. 2:16-MD-2724**

THIS DOCUMENT RELATES TO:

HON. CYNTHIA M. RUFE

Direct Purchaser Plaintiffs' Actions

**DIRECT PURCHASER PLAINTIFFS' CORRECTED MOTION FOR AN ORDER
WITH RESPECT TO THE GLENMARK SETTLEMENT:**

- (1) CERTIFYING A SETTLEMENT CLASS;**
- (2) GRANTING PRELIMINARY APPROVAL OF THE SETTLEMENT AGREEMENT;**
- (3) APPOINTING SETTLEMENT CLASS COUNSEL;**
- (4) APPOINTING A CLAIMS ADMINISTRATOR AND ESCROW AGENT;**
- (5) APPROVING THE FORM AND MANNER OF
NOTICE TO THE SETTLEMENT CLASS;**
- (6) GRANTING PRELIMINARY APPROVAL OF THE PLAN OF ALLOCATION; AND**
- (7) SCHEDULING A FAIRNESS HEARING**

Pursuant to Federal Rule of Civil Procedure 23, Direct Purchaser Plaintiffs' César Castillo, LLC, FWK Holdings, L.L.C., Rochester Drug Co-Operative, Inc., and KPH Healthcare Services, Inc. a/k/a Kinney Drugs, Inc. (collectively, the "Settling Plaintiffs") respectfully move for entry of the Proposed Order submitted herewith providing for:

- (1) Certification of the Settlement Class;
- (2) Preliminary approval of the proposed Settlement Agreement between Settling Plaintiffs and Defendant Glenmark Pharmaceutical Inc., USA ("Settling Defendant");
- (3) Appointment of Settlement Class Counsel for the Settlement Class;
- (4) Appointment of A.B. Data, Ltd. as the Claims Administrator and The Huntington National Bank as the Escrow Agent;
- (5) Approval of the proposed form and manner of Notice to the Settlement Class;
- (6) Preliminary approval of the Plan of Allocation;

(7) The establishment of a proposed schedule leading up to and including the Fairness hearing.

In support of this Motion, Settling Plaintiffs rely upon the Memorandum of Law and exhibits and declarations thereto filed on August 18, 2025. *See* MDL Doc. Nos. 3593-1-7.

Dated: August 29, 2025

Respectfully submitted,



Dianne M. Nast
NASTLAW LLC
1101 Market Street, Suite 2801
Philadelphia, Pennsylvania 19107
(215) 923-9300
dnast@nastlaw.com

*Lead and Liaison Counsel
for Direct Purchaser Plaintiffs*

David F. Sorensen
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, Pennsylvania 19103
(215) 875-3000
dsorensen@bm.net

Thomas M. Sobol
HAGENS BERMAN SOBOL SHAPIRO LLP
1 Faneuil Hall Square, 5th Floor
Boston, Massachusetts 02109
(617) 482-3700
tom@hbsslaw.com

Robert N. Kaplan
KAPLAN FOX & KILSHEIMER LLP
800 Third Avenue, 38th Floor
New York, New York 10022
(212) 687-1980
rkaplan@kaplanfox.com

Linda P. Nussbaum
NUSSBAUM LAW GROUP, PC
1133 Avenue of the Americas, 31st Floor
New York, New York 10036
(917) 438-9189
lnussbaum@nussbaumpc.com

Michael L. Roberts
ROBERTS LAW FIRM US, PC
1920 McKinney Ave., Suite 700
Dallas, Texas 75201
(501) 821-5575
mikeroberts@robertslawfirm.us

Direct Purchaser Plaintiffs' Steering Committee