

**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**

**DIRECT PURCHASER PLAINTIFFS' UNCONTESTED MOTION  
FOR DISTRIBUTION OF SANDOZ SETTLEMENT FUND**

Pursuant to Paragraph 5.1 of the Direct Purchaser Plaintiffs' Plan of Allocation for the Settlement Classes [16-md-2724, Doc. 3010-7], 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. respectfully move for entry of the Proposed Order granting leave to distribute the Net Settlement Fund from the court-approved settlement with Sandoz Inc. and Fougera Pharmaceuticals Inc. ("Sandoz").

In support of this motion, Direct Purchaser Plaintiffs rely upon the accompanying memorandum, the Declaration of Eric J. Miller Regarding Distribution of Sandoz Settlement Fund, and the exhibits thereto. Sandoz does not oppose this Motion.

Dated: August 6, 2026

Respectfully submitted,



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*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*

**MEMORANDUM OF LAW IN SUPPORT OF  
DIRECT PURCHASER PLAINTIFFS' UNCONTESTED MOTION  
FOR DISTRIBUTION OF SANDOZ SETTLEMENT FUND**

Pursuant to Paragraph 5.1 of the Direct Purchaser Plaintiffs' Plan of Allocation for the Settlement Class [16-md-2724, Doc. 3010-7], Direct Purchaser Plaintiffs move for entry of the Proposed Order granting leave to distribute the Net Settlement Fund from the court-approved Sandoz settlement.

As set out in greater detail in the Miller Declaration, attached as Exhibit A hereto, A.B. Data has completed all aspects of the Plan of Allocation that can be completed prior to obtaining further approval from this Court. In accordance with Paragraph 1.1 of the Plan of Allocation, which is identical for all three settlements, A.B. Data mailed claim forms all Settlement Class Members that could be identified, and posted a blank Claim Form, along with a list of the National Drug Codes for each Named Generic Drug covered by the Plan of Allocation, on the settlement website, to which Settlement Class Members were directed through mailed and publication notice. Miller Declaration at ¶¶ 4-5.

A.B. Data has received valid claims from 139 Settlement Class Members, and, based on estimates prepared by Econ One at the time claim forms were mailed to Settlement Class Members, they would have been allocated a combined total of more than 95% of the Settlement

Fund. *Id.* at ¶ 5. According to the same estimates, the Settlement Class Members that did not submit claims would have been allocated a combined total of less than 5% of the Settlement Fund, and about half of those would have recovered only the minimum distribution of \$25.00. *Id.* at ¶ 6.

A.B. Data has received and processed a total of 147 claims and determined that 139 were properly documented. *Id.* at ¶¶ 7-8. Although 13 of those 139 claims were submitted after the deadline to submit claim forms, they were otherwise complete, so Class Counsel, with the recommendation of A.B. Data, respectfully requests the Court's approval of those claims pursuant to Paragraph 3.3 of the Plan of Allocation. *Id.* at 8.

At present, the Net Settlement Fund has a balance of \$171,642,138.08. *Id.* at ¶ 12. This balance reflects: earned interest, court approved payments from the Settlement Fund for reimbursement of Settlement Class Counsel's expenses, Class Representative Service Awards, payment of any attorneys' fees awarded by this Court, as approved by the Court on March 17, 2025 [16-md-2724, Doc. 3292]. Miller Declaration at ¶ 12.

Using \$168,209,295.32, *i.e.*, the current value of the Net Settlement Fund less 2% reserved for the purpose of paying taxes, Econ One has calculated the shares for those 139 Settlement Class Member and has included each of their names and shares on the list attached as Exhibit 1 to the Miller Declaration. *Id.* To the extent the Settlement Fund continues to accrue interest, that interest (less a 2% holdback for taxes) will be distributed *pro rata* to the Settlement Class Members listed in Exhibit 1 to the Miller Declaration. *Id.*

1. A.B. Data has determined that the remaining eight (8) submitted claims were deficient or incomplete, primarily because the claims: (a) contained inadequate information or documentation in support of the Claimant's purchases and/or failed to provide information or

documentation to rebut A.B. Data's rejection determination; or (b) were duplicates of existing claims. *Id.* at ¶ 9. Of those eight (8) deficient or incomplete claims, one (1) claim was filed by an individual consumer, and one (1) claim was filed by a business entity, neither which made a direct purchase of a Named Generic Drug that qualified for class membership and therefore were rejected. *Id.* at ¶ 10. The remaining six (6) deficient or incomplete claims were determined to be duplicates. *Id.*

As required by the Plan of Allocation, after each determination of deficiency, whether following a review of the initial claim or following a challenge to an initial determination of deficiency, A.B. Data provided each claimant with 28 days to cure the deficiency. *Id.* at ¶ 11. None of these eight (8) claimants sufficiently cured their deficiencies. *Id.* Attached as Exhibit 2 to the Miller Declaration is a list of the name of each Claimant that submitted a claim that was rejected and the reason except for the one (1) individual consumer whose name is redacted for privacy reasons. *Id.*

On June 1, 2026, AB Data informed each rejected Claimant of its rejection for purposes of calculating any appeal. *Id.* No challenges to the final rejections were received. *Id.*

Based on Settlement Class Counsel's judgment and experience, and on Mr. Miller's recommendation, Settlement Class Counsel respectfully request that the Court:

1. Adjudge the procedures and actions taken for the administration of the Sandoz Settlement to be proper and complete;
2. Approve the administrative determinations of A.B. Data in accepting and rejecting Claims filed in this matter;
3. Prohibit the acceptance of additional claims absent a showing of compelling circumstances justifying the late acceptance of any such claims;

4. Authorize disbursement of the \$168,209,295.32 in the Net Settlement Fund (*i.e.*, \$171,642,138.08 minus 2% reserved for the payment of taxes), plus 98% of any additional interest accrued, to the 139 Settlement Class Members listed on Exhibit 1 to the Miller Declaration pursuant to the *pro rata* shares noted on that list, *see id.* at ¶ 13;

5. Authorize a 90-day period for negotiating settlement checks, and a 30-day period for negotiating any reissued checks, *see id.*;

6. Authorize, subject to additional Court approval, distribution of any monies from the Net Settlement Fund that remain unclaimed after the first distribution, if economically feasible, to Claimants on the basis of the same calculations of the remaining Claimant's *pro rata* shares of qualifying purchases, adjusted to remove the *pro rata* shares of Claimants that did not claim their first distributions, or, if not economically feasible, retention of any remaining funds while this litigation continues, to be distributed with subsequent distributions, awarded as attorneys' fees or to reimburse litigation expenses, or be used to make *cy pres* payments for the benefit of the Settlement Class, subject to additional Court approval, *see id.* at ¶ 14;

7. Authorize, one year after final distribution of the Net Settlement Fund, discarding of paper or hard copies of claim forms and related documents, and, three years after final distribution of the Net Settlement Fund, discarding of electronic media or data, including copies of the Claimants list and the computer database and programs used to create the Claimants list, provided that A.B. Data and/or Class Counsel retain copies of documents reflecting allocation amounts and percentages for their record, *see id.* at ¶ 15.

Dated: August 6, 2026

Respectfully submitted,



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*Direct Purchaser Plaintiffs' Steering Committee*

# EXHIBIT A



**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. RUFÉ**

***Direct Purchaser Plaintiffs' Actions***

**DECLARATION OF ERIC J. MILLER REGARDING  
DISTRIBUTION OF SANDOZ SETTLEMENT FUND**

I, Eric J. Miller, hereby declare and state as follows:

1. I am a Senior Vice President with A.B. Data, Ltd. ("A.B. Data"). I am fully familiar with the facts contained herein based upon my personal knowledge and information provided by other A.B. Data employees working under my supervision, and if called as a witness, I could and would testify competently thereto.

2. In its Sandoz Preliminary Approval Order dated June 26, 2024 the Court appointed A.B. Data to serve as the claims administrator for the direct purchaser settlement with Sandoz, to issue notice to Settlement Class Members and administer the claim process. 16-md-2724, Doc. 3021 at ¶ 13.

3. In its Final Approval Order dated March 17, 2025 the Court determined that the notice issued to the Settlement Class Members complied with the Court's Preliminary Approval Orders and satisfied the requirements of Rule 23. 16-md-2724, Doc. 3291 at ¶ 3.

4. In accordance with Paragraph 1.1 of the Direct Purchaser Plaintiffs' Plan of Allocation for the Settlement Class ("Plan of Allocation") [16-md-2724, Doc. 3010-7], A.B. Data: (a) mailed a pre-populated Claim Form to each Settlement Class Member identified from the transactional or other sales data Defendants produced in this case; (b) mailed a blank Claim Form

to any additional Settlement Class Member identified by Settlement Class Counsel, including through review of customer lists produced by Defendants; and (c) posted a blank Claim Form, along with a list of the National Drug Codes for each Named Generic Drug covered by the Plan of Allocation, on the settlement website, to which Settlement Class Members were directed through mailed and publication notice.

5. A.B. Data mailed claim forms to all known Settlement Class Members, and 139 of those Settlement Class Members submitted valid claims. Based on estimates prepared by Econ One at the time claim forms were mailed to Settlement Class Members, those 139 Settlement Class Members would have been allocated a combined total of more than 95% of the Settlement Fund.

6. Based on estimates prepared by Econ One at the time that claim forms were mailed to Settlement Class Members, the remaining Settlement Class Members that did not submit claims would have been allocated a combined total of less than 5% of the Settlement Fund. About half of those would have recovered the minimum distribution of \$25.00.

7. A.B. Data received and processed a total of 147 claims with assistance from Econ One and Settlement Class Counsel as required and appropriate.

8. In reviewing the claims that were submitted, A.B. Data determined that 139 were properly documented. Of those 139 claims, 13 were submitted after the deadline, but because those claims were otherwise complete, A.B. Data determined that they should be accepted, subject to approval by Settlement Class Counsel (which has been granted) and the Court, pursuant to Paragraph 3.3 of the Plan of Allocation. In accordance with Paragraph 3.4 of the Plan of Allocation, Econ One, in conjunction with A.B. Data and Settlement Class Counsel, determined the *pro rata* share of qualifying purchases for each Settlement Class Member who submitted a valid claim. A

list of each such Settlement Class Member's name and its *pro rata* share of qualifying purchases is attached hereto as Exhibit 1 to this Declaration.

9. In reviewing the claim forms that were submitted, A.B. Data determined that eight (8) were deficient or incomplete. Among the types of deficiencies found were claim forms that: (a) contained inadequate information or documentation in support of the Claimant's purchases and/or failed to provide information or documentation to rebut A.B. Data's rejection determination; or (b) were duplicates of existing claims.

10. Of those eight (8) deficient or incomplete claims, one (1) claim was filed by an individual consumer and one (1) claim was filed by a business entity, neither of which made a direct purchaser of a Named Generic Drug that qualified for class membership and therefore were rejected. The remaining six (6) deficient or incomplete claims were determined to be duplicates. For privacy reasons, the name of the individual consumer is redacted from the list of rejected claims attached hereto as Exhibit 2 to this Declaration.

11. In accordance with Paragraphs 3.2, 4.2, and 4.3 of the Plan of Allocation, prior to making its final deficiency determinations for those eight (8) claims, A.B. Data communicated via First Class Mail, email, or telephone with each Claimant that had submitted deficient or incomplete claim forms and/or had responded to requests for additional information or documentation to support a challenge. In those communications, A.B. Data provided each such Claimant with 28 days to cure its deficiency, and after those 28 days passed without an adequate response and/or correction of the deficiency, A.B. Data sent a letter advising each such Claimant of the rejection and the reason. Pursuant to Paragraph 5.1 of the Plan of Allocation, attached as Exhibit 2 is a list of the name of each Claimant that submitted a claim that was rejected and the reason. On June 1,

2026, A.B. Data informed each rejected Claimant of its rejection for purposes of calculating any appeal. No challenges to the final rejections were received.

12. At present, the Net Settlement Fund has a balance of \$171,642,138.08. This balance reflects: earned interest, court approved payments from the Settlement Fund for reimbursement of Settlement Class Counsel's expenses, Class Representative Service Awards, payment of any attorneys' fees awarded by this Court, as approved by the Court on March 17, 2025 [16-md-2724, Doc. 3292]. A.B. Data recommends a 2% reserve for purposes of paying taxes, making the current amount to be distributed \$168,209,295.32.

13. With the Court's approval, A.B. Data will calculate the distribution amount for each of the 139 Settlement Class Members that submitted valid claims by multiplying the Net Settlement Fund, including all interest accrued, by the *pro rata* share of qualifying purchases for each claimant (less a 2% holdback for taxes), A.B. Data will then cause checks or wires to be sent in the appropriate amounts to these 139 Settlement Class Members in accordance with the claimants' instructions as to how the distributions should be made. Checks for distribution shall bear the notation "Non-Negotiable After 90 Days," and any checks that are reissued at the request of the claimant shall bear the notation "Non-Negotiable After 30 Days."

14. It is anticipated that the entirety of the Net Settlement Fund will be distributed in a single distribution. However, subject to any further order of the Court, any monies from the Net Settlement Fund that remain unclaimed after the first distribution shall, if economically feasible, be distributed to Claimants in an additional distribution or distributions on the basis of the same calculations of the remaining Claimant's *pro rata* shares of qualifying purchases, adjusted to remove the *pro rata* shares of Claimants that did not claim their first distributions. If an additional distribution is not economically feasible, any remaining funds will be retained while this litigation

continues and, with Court approval, be distributed with subsequent distributions, awarded as attorneys' fees or to reimburse litigation expenses, or be used to make *cy pres* payments for the benefit of the Settlement Class.

15. Unless otherwise ordered by the Court, one year after final distribution of the Net Settlement Fund, A.B. Data will discard paper or hard copies of claim forms and related documents, and three years after final distribution of the Net Settlement Fund, A.B. Data will discard electronic media or data, including its copy of the Claimants list and its computer database and programs used to create the Claimants list. A.B. Data and/or Class Counsel shall retain copies of documents reflecting allocation amounts and percentages for their records.

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

Executed on August 6, 2026

  
Eric J. Miller

## EXHIBIT 1

**AUTHORIZED CLAIMANTS FOR DPPS' SANDOZ SETTLEMENT**

|     | <b>AUTHORIZED CLAIMANT</b>      | <b>SHARE</b>    |
|-----|---------------------------------|-----------------|
| 1.  | ADUSA DISTRIBUTION              | \$214,103.28    |
| 2.  | ADVANTAGE LOGISTICS             | \$66,334.45     |
| 3.  | AHOLD USA INC                   | \$266,602.92    |
| 4.  | AMC PHARMACY SOLUTIONS          | \$25.00         |
| 5.  | AMERICAN HOME PATIENT           | \$15,562.60     |
| 6.  | AMERICAN SALES COMPANY          | \$759,864.60    |
| 7.  | AMERICAN VETERINARY SUPPLY CORP | \$802.76        |
| 8.  | AMERISOURCE BERGEN              | \$38,865,714.63 |
| 9.  | ANIMAL HEALTH INTERNATIONAL INC | \$4,246.33      |
| 10. | ASD SPECIALTY HEALTHCARE        | \$2,800.40      |
| 11. | ASSOCIATED PHARMACIES           | \$921,800.84    |
| 12. | AUBURN PHARMACEUTICALS          | \$444,101.19    |
| 13. | BASHAS INC                      | \$15,218.73     |
| 14. | BELLCO                          | \$515,146.76    |
| 15. | BELLDINAS HEALTHMART PHARMACY   | \$408.70        |
| 16. | BENECARD CENTRAL FILL           | \$4,498.64      |
| 17. | BESSE MEDICAL SUPPLY            | \$28,354.96     |
| 18. | BIG Y FOODS INC                 | \$9,175.07      |
| 19. | BLOODWORTH WHOLESALE            | \$227,283.25    |
| 20. | BONITA PHARMACEUTICALS          | \$4,210.24      |
| 21. | BORSCHOW HOSP & MEDICAL SUPPLY  | \$1,307.72      |
| 22. | BOSWELL PHARMACY SERVICES       | \$4,684.05      |
| 23. | BROOKSHIRE GROCERY COMPANY      | \$57,118.92     |
| 24. | CAPITAL WHOLESALE               | \$190,679.54    |
| 25. | CARDINAL HEALTH                 | \$45,320,759.90 |
| 26. | CEDARDALE DISTRIBUTORS          | \$53,618.64     |
| 27. | CESAR CASTILLO INC              | \$7,715.03      |
| 28. | CLERMONT COMMUNITY PHARMACY INC | \$637.18        |
| 29. | D V MEDICAL SUPPLY INC          | \$1,871.84      |
| 30. | DAKOTA DRUG                     | \$500,575.54    |
| 31. | DELHAIZE AMERICA                | \$121,342.57    |
| 32. | DIK DRUG                        | \$107,753.63    |
| 33. | DISCOUNT DRUG MART              | \$206,236.51    |
| 34. | DMS PHARMACEUTICAL              | \$28,160.13     |
| 35. | DROGUERIA BETANCES              | \$749,030.10    |
| 36. | ENCLARA                         | \$61,711.96     |
| 37. | EVERETT & HURITE OPHTHAL ASSOC  | \$25.00         |
| 38. | EXEL INC                        | \$118.37        |
| 39. | FIRST VETERINARY SUPPLY         | \$25.00         |
| 40. | FRANK W KERR                    | \$330,747.44    |
| 41. | FRECKER MELVIN OD               | \$25.00         |
| 42. | GCP PHARMA                      | \$35,225.32     |
| 43. | GENERAL INJECTABLES & VACCINES  | \$3,905.52      |
| 44. | GENETCO                         | \$283,549.65    |

**AUTHORIZED CLAIMANTS FOR DPPS' SANDOZ SETTLEMENT**

|     | <b>AUTHORIZED CLAIMANT</b>        | <b>SHARE</b>    |
|-----|-----------------------------------|-----------------|
| 45. | GENMEDIX                          | \$3,020.67      |
| 46. | GERIMED                           | \$27,981.26     |
| 47. | GIANT EAGLE PHARMACY              | \$826,444.57    |
| 48. | H. D. SMITH WHOLESALE             | \$2,099,569.17  |
| 49. | HANNAFORD                         | \$75,480.24     |
| 50. | HARVARD DRUG                      | \$422,515.90    |
| 51. | HEALTH COALITION INC              | \$163.86        |
| 52. | HEALTHSOURCE DISTRIBUTORS         | \$79,317.39     |
| 53. | HELLER WARREN H MD                | \$25.00         |
| 54. | HENRY SCHEIN                      | \$116,339.34    |
| 55. | HI SCHOOL PHARMACY                | \$4,608.03      |
| 56. | HODGES DARYL OD                   | \$25.00         |
| 57. | HSB VETERINARY SUPPLY INC         | \$1,043.97      |
| 58. | HY-VEE                            | \$295,447.92    |
| 59. | HYGEN PHARMACEUTICALS             | \$8,865.84      |
| 60. | INDEPENDENT PHARMACY COOP         | \$4,649.11      |
| 61. | INDEPENDENT PHARMACY DISTRIBUTOR  | \$15,877.16     |
| 62. | INSOURCE INC                      | \$473.34        |
| 63. | IPC                               | \$219,561.64    |
| 64. | JEM TREATMENT INC                 | \$25.00         |
| 65. | KAISER                            | \$4,406,643.00  |
| 66. | KASH N KARRY FOOD STORES          | \$20,461.15     |
| 67. | KEYSOURCE MEDICAL INC             | \$216,245.93    |
| 68. | KING DRUG COMPANY OF FLORENCE     | \$1,067.29      |
| 69. | KINNEY DRUGS                      | \$167,648.90    |
| 70. | KINRAY                            | \$415,973.55    |
| 71. | KMART                             | \$17,883.43     |
| 72. | KPH HEALTHCARE SERVICES INC       | \$214,667.00    |
| 73. | LIVINGSTON STERN & ASSOCIATES     | \$3,121.90      |
| 74. | LOUISIANA WHOLESALE               | \$457,928.00    |
| 75. | MAJOR PHARMACEUTICALS             | \$62,332.15     |
| 76. | MASTERS DRUG COMPANY INC          | \$71,795.03     |
| 77. | MASTERS PHARMACEUTICAL            | \$283,879.19    |
| 78. | MASTERS SPECIALTY PHARMA          | \$25.00         |
| 79. | MATRIX DISTRIBUTORS INC           | \$23,019.57     |
| 80. | MCKESSON                          | \$54,117,320.09 |
| 81. | MEIJER                            | \$820,167.42    |
| 82. | METRO MEDICAL SUPPLY              | \$27,561.36     |
| 83. | MIAMI LUKEN                       | \$129,652.28    |
| 84. | MILIADS INTERNATIONAL             | \$460.88        |
| 85. | MORRIS & DICKSON                  | \$2,741,477.11  |
| 86. | MWI VETERINARY SUPPLY             | \$160,275.21    |
| 87. | MYODERM MEDICAL                   | \$1,817.55      |
| 88. | NEW HOPE BEHAVIORAL HEALTH CENTER | \$25.00         |



**AUTHORIZED CLAIMANTS FOR DPPS' SANDOZ SETTLEMENT**

|      | <b>AUTHORIZED CLAIMANT</b>               | <b>SHARE</b>   |
|------|------------------------------------------|----------------|
| 89.  | NORTH CAROLINA MUTUAL WHOLESALE DRUG     | \$1,235,403.75 |
| 90.  | NORTHWEST GENERICS                       | \$42,843.53    |
| 91.  | OCUSOFT INC                              | \$986.74       |
| 92.  | OMNI HEALTHCARE INC                      | \$2,586.82     |
| 93.  | ONCOLOGY SUPPLY                          | \$198,743.89   |
| 94.  | OSBORN DRUGS                             | \$23,083.57    |
| 95.  | PARMED                                   | \$12,171.24    |
| 96.  | PATTERSON DENTAL SUPPLY INC              | \$148.39       |
| 97.  | PATTERSON VETERINARY SUPPLY INC          | \$58,563.69    |
| 98.  | PBA HEALTH                               | \$22,068.05    |
| 99.  | PHARMACARE                               | \$43,400.84    |
| 100. | PHARMACY BUSINESS ASSOCIATES             | \$15,834.94    |
| 101. | PHARMACY BUYING ASSOCIATION              | \$306,518.70   |
| 102. | PHARMACY SELECT                          | \$45,912.34    |
| 103. | PRECISION DOSE INC                       | \$459.67       |
| 104. | PREFERRED PHARMA                         | \$223.83       |
| 105. | PRESCRIPTION SUPPLY                      | \$148,854.62   |
| 106. | PRICE CHOPPERS                           | \$84,110.74    |
| 107. | PROPHARMA DISTRIBUTION                   | \$25.00        |
| 108. | PUBLIX SUPER MARKETS                     | \$1,927,542.28 |
| 109. | QK HEALTHCARE INC                        | \$56,607.90    |
| 110. | QUALITY CARE PRODUCTS                    | \$55,242.51    |
| 111. | QUEST PHARMACEUTICALS                    | \$224,647.97   |
| 112. | RALEYS                                   | \$32,450.14    |
| 113. | RDC                                      | \$878,359.41   |
| 114. | REMEDYREPACK                             | \$25.00        |
| 115. | REPHARM                                  | \$648.45       |
| 116. | RICHIE PHARMACAL                         | \$236,592.00   |
| 117. | RX OUTREACH                              | \$28,822.63    |
| 118. | SCHNUCKS PHARMACY                        | \$249,562.10   |
| 119. | SIGMA PHARMACEUTICALS                    | \$157.82       |
| 120. | SOUTH POINTE WHOLESALE                   | \$2,530.61     |
| 121. | SOUTHERN ANESTHESIA & SURGICAL           | \$25.00        |
| 122. | SPARTANNASH                              | \$1,591.24     |
| 123. | SUPERVALU                                | \$769,762.48   |
| 124. | SWISS AMERICAN PRODUCTS INC              | \$1,048.12     |
| 125. | TAIGA DISTRIBUTION                       | \$9,655.12     |
| 126. | THE GREAT ATLANTIC & PACIFIC TEA COMPANY | \$19,672.96    |
| 127. | THRIFTY WHITE                            | \$440,805.20   |
| 128. | TOP RX                                   | \$491,250.05   |
| 129. | TOPS MARKETS                             | \$13,335.19    |
| 130. | TRUECARE PHARMACY                        | \$6,791.53     |
| 131. | UNIV OF MIAMI BASCOM PALMER              | \$25.00        |
| 132. | US ONCOLOGY                              | \$25.00        |

**AUTHORIZED CLAIMANTS FOR DPPS' SANDOZ SETTLEMENT**

|      | <b>AUTHORIZED CLAIMANT</b>          | <b>SHARE</b>            |
|------|-------------------------------------|-------------------------|
| 133. | VALLEY WHOLESALE DRUG               | \$285,768.16            |
| 134. | VALUE DRUG                          | \$810,136.06            |
| 135. | WAKEFERN FOOD CORP                  | \$307,640.90            |
| 136. | WEGMANS FOOD MARKETS                | \$3,109.47              |
| 137. | WEIS MARKETS                        | \$96,965.35             |
| 138. | WESTWOOD PHARMACY                   | \$114.28                |
| 139. | WHITE DRUG COMPANY OF JAMESTOWN INC | \$20,482.73             |
|      |                                     |                         |
|      | <b>TOTAL</b>                        | <b>\$168,209,295.32</b> |

## EXHIBIT 2

**REJECTED CLAIMANTS FOR DPPS' SANDOZ SETTLEMENT**

|    | <b>CLAIMANT</b>                         | <b>REASON FOR REJECTION</b>                                                        |
|----|-----------------------------------------|------------------------------------------------------------------------------------|
| 1. | BASHAS INC.                             | Duplicate of valid claim                                                           |
| 2. | BELLDINAS                               | Duplicate of valid claim                                                           |
| 3. | MAO PHARMACY D/B/A<br>WESTWOOD PHARMACY | Duplicate of valid claim                                                           |
| 4. | PHARMACARE                              | Duplicate of valid claim                                                           |
| 5. | WAKEFERN FOOD CORP                      | Duplicate of valid claim                                                           |
| 6. | WAKEFERN FOOD CORP                      | Duplicate of valid claim                                                           |
| 7. | [REDACTED]                              | Individual consumer claim                                                          |
| 8. | SUPER HEALTH PHARMACY                   | Not a known class member, insufficient documentation and/or no response to letters |

**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**

**[PROPOSED] ORDER AUTHORIZING DISTRIBUTION OF  
SANDOZ SETTLEMENT FUND BY DPPS**

**AND NOW**, this \_\_\_\_ day of \_\_\_\_\_, 2026, upon consideration of Direct Purchaser Plaintiffs' Uncontested Motion for Distribution of Sandoz Settlement Fund, it is hereby **ORDERED** as follows:

1. The procedures used and actions taken by Claims Administrator A.B. Data, Ltd.; Plaintiffs' expert economist Dr. Jeffrey L. Leitzinger, Ph.D. of Econ One; and Direct Purchaser Plaintiffs' Settlement Class Counsel for the administration of the Sandoz Settlement are hereby adjudged to have been proper and complete.
2. The administrative determinations of A.B. Data in accepting and rejecting Claims filed in this matter are approved.
3. The 139 properly documented Claims referenced in Exhibit 1 to the Declaration of Eric J. Miller ("Miller Declaration"), submitted as Exhibit A to the Distribution Motion [16-md-2724, Doc. \_\_\_\_] are approved. These Claims are henceforth referred to as the Authorized Claimants.
4. No additional claims will be accepted absent a showing of compelling circumstances justifying the late acceptance of any such claims.

5. The recommendation by Mr. Miller to reject the eight (8) Claims that were either not properly documented or are otherwise invalid, as set forth in the Miller Declaration, is approved and those claims are deemed rejected.

6. Mr. Miller has concluded that the Net Settlement Fund is \$171,642,138.08 that 2% of the Net Settlement Fund should be withheld for the payment of taxes, and that the remaining \$168,209,295.32 plus 98% of additional interest that may accrue should be distributed to the Authorized Claimants.

7. Mr. Miller is directed to distribute the entire Net Settlement Fund plus any additional accrued interest, except the 2% withheld for taxes, to the Authorized Claimants in accordance with the Direct Purchaser Plaintiffs' Plan of Allocation for the Settlement Classes [16-md-2724, Doc. 3010-7]. Each Authorized Claimant shall receive his/her/its share of the total distribution as calculated by Mr. Miller, with the assistance of Dr. Leitzinger and Settlement Class Counsel.

8. Checks for distribution to the Authorized Claimants shall bear the notation "Non-Negotiable After 90 Days," and no check shall be negotiated from the Settlement Fund more than 90 days after the date of the check. Any checks that are reissued at the request of the claimant shall bear the notation "Non-Negotiable After 30 Days," and no reissued check shall be negotiated from the Settlement Fund more than 30 days after the date of the reissued check.

9. Any monies from the Net Settlement Fund that remain unclaimed after the first distribution shall, if economically feasible, be distributed to Claimants in an additional distribution or distributions on the basis of the same calculations of the remaining Claimant's *pro rata* shares of qualifying purchases, adjusted to remove the *pro rata* shares of Claimants that did not claim their first distributions. Insofar as an additional distribution is not economically feasible, any

remaining funds will be retained while this litigation continues and, with Court approval, be distributed with subsequent distributions, awarded as attorneys' fees or to reimburse litigation expenses, or be used to make *cy pres* payments for the benefit of the Settlement Class.

10. The Direct Purchaser Plaintiff Settlement Class, Class Counsel, A.B. Data, Econ One, and all persons who were involved in the review, verification, calculation, tabulation, or any other aspect of the processing of the claims filed in this action, or who are otherwise involved in the administration or taxation of the Net Settlement Fund, are hereby released and discharged from any and all claims arising out of such involvement, and, pursuant to the release terms of the settlement agreement, all settlement class members and claimants, and their assignees, whether or not they are to receive payment from the Net Settlement Fund, are hereby barred from making any further claim against the Net Settlement Fund beyond the amount, if any, allocated to them during the claim administration process.

11. Class Counsel, A.B. Data, and Econ One are hereby authorized to discard (a) paper or hard copies of claim forms and related documents not less than one year after distribution of the Net Settlement Fund to the 139 Authorized Claimants; and (b) electronic media or data, including its copy of the Claimants list and its computer database and programs used to create the Claimants list, not less than three years after distribution of the Net Settlement Fund to the 139 Authorized Claimants. A.B. Data and/or Class Counsel shall retain copies of documents reflecting allocation amounts and percentages for their records.

12. The Court retains jurisdiction over any further application or matter which may arise in connection with the administration of this settlement.

It is so **ORDERED**.

**BY THE COURT:**

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**CYNTHIA M. RUFÉ, J.**