

EXHIBIT

1

<i>In re Neurontin Antitrust Litigation</i>)	Master File No. 02-1390
)	
THIS DOCUMENT RELATES TO:)	Civil Action No. 02-1830
)	Civil Action No. -02-2731
LOUISIANA WHOLESALE DRUG)	
COMPANY, INC., MEIJER, INC. and)	
MEIJER DISTRIBUTION, INC., on)	
behalf of themselves and all others)	
similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	
)	
PFIZER, INC. and WARNER-)	
LAMBERT CO.,)	
)	
Defendants.)	
)	

STATE OF NEW YORK)
) ss.:
COUNTY OF NASSAU)

1. I am the Managing Director of Berdon Claims Administration LLC (“Berdon”), Court-approved Claims Administrator in the above-captioned class action. As such, I am personally familiar with the facts described herein.

2. This affidavit is submitted to describe the procedures employed by Berdon to ensure that all persons or entities in the United States that purchased Neurontin directly from the Defendants, Pfizer, Inc. and Warner-Lambert Company LLC (collectively, “Pfizer”), at any time during the period of December 11, 2002 through August 31, 2008 (the “Class Period”), and who have pur-

chased generic gabapentin, were given timely notice of the proposed settlement of this class action. Excluded from the Class are Defendants and each of their parents, employees, subsidiaries, affiliates and franchisees, and all governmental entities, as well as those that excluded themselves from the Class on or before April 4, 2011.

3. Pursuant to paragraph 6 of the Order Preliminarily Approving Settlement, Authorizing Notice to the Class and Setting Hearing, dated May 1, 2014 (the “Order”), the “written Notice for mailing to all known Class members,” annexed hereto as Exhibit A, was effected by Berdon via first-class mail on May 12, 2014. Copies of the Notice were addressed to 67 potential Class members, some at their multiple mailing addresses identified from Pfizer’s electronic database of direct purchasers that had been used in the Notice of Pendency mailing on February 18, 2011, bringing the mailing list to a total of 111 Notices.

4. Moreover, in the interests of maximum inclusion, the current mailing list was compared with, and corrected to reflect, the updated addresses that had been used in a 2013 mailing for a similar case. As a result, the mailing list was supplemented by an additional 10 addresses for certain direct purchasers, and on May 12, 2014, a total of 121 copies of the Notice were mailed.

5. Of the 121 Notices mailed, the USPS returned 29 as undeliverable. An Internet search performed by Berdon resulted in 26 better addresses, and one address was confirmed as good, so a total of 27 Notices were re-addressed and re-mailed. There were no good addresses that could be found for two Class members, and 6 Notices were returned even after having been re-mailed with a purported updated address, for a total of 8 Notices that remain undeliverable. Berdon will continue to take all reasonable steps to ensure that the Class is provided with copies of the Notice.

6. Concurrent with the mailing on May 12, 2014, Berdon posted the Notice on its website at www.berdonclaims.com, together with the Settlement Agreement.

7. Also pursuant to paragraph 6 of the Order, the Summary Notice of Proposed Class Action Settlement, Motion for Attorneys' Fees and Hearing regarding Settlement was published in *The Pink Sheet* on May 12, 2014, concurrent with the mailing of the Notice. Under my direction and supervision, the advertising firm of Trendson Consulting Corp. was engaged to effect such publication, and a copy thereof in the form in which it appeared in *The Pink Sheet* on that date is annexed hereto as Exhibit B.

The foregoing statements are true and correct to the best of my knowledge, information and belief.



MICHAEL ROSENBAUM

Sworn to before me this
25th day of June, 2014


Notary Public

MARLENE HURWITZ
NOTARY PUBLIC, State of New York
No. 46-97422
Qualified in Nassau County
Commission Expires April 30, 2015

EXHIBIT A

If you bought NEURONTIN directly from PFIZER OR WARNER-LAMBERT, your rights could be affected by a lawsuit

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

- The purpose of this notice is to alert you to a proposed settlement of a Class Action Lawsuit (the “Lawsuit”) brought by Direct Purchasers of Neurontin against Pfizer Inc. and Warner-Lambert Company LLC (collectively “Pfizer” or “Defendants”). The Lawsuit asserts that Pfizer violated antitrust laws relating to the sale of its prescription drug Neurontin.

- **The Court has allowed the Lawsuit to be brought as a class action on behalf of:**

All persons or entities in the United States that purchased Neurontin from Pfizer at any time during the period of December 11, 2002 through August 31, 2008 and who have purchased generic gabapentin. Excluded from the Class are Defendants and each of their respective parents, employees, subsidiaries, affiliates, and franchisees, and all government entities.

- **Also excluded from the Class are:**

CVS Pharmacy Inc., Caremark, L.L.C., Rite Aid Corporation, Rite Aid HDQTRS Corp., Walgreen Co., American Sales Co, Inc., HEB Grocery Co. LP, Safeway Inc., SuperValu, Inc., and The Kroger Co., in their own right as direct purchasers of Neurontin from Pfizer and as assignees limited to their purchases of Neurontin from Class members.

- This Court has preliminarily approved a proposed settlement of the Lawsuit (the “Settlement”) between Defendants and the Class. The Settlement will provide for payment of \$190,000,000.00 (one hundred ninety million dollars) plus interest into an escrow account (the “Settlement Fund”). The Settlement will also provide for allocation of the net Settlement Fund to the members of the Class, compensation of counsel for the Class (“Class Counsel”) for expenses and attorneys’ fees out of the Settlement Fund, and incentive awards to named Plaintiffs out of the Settlement Fund, as approved by the Court.
- The Court has scheduled a hearing on final approval of the Settlement, the plan for allocating the Settlement Fund to members of the Class (summarized in response to Question 9), and Class Counsel’s request for reimbursement of costs and for attorneys’ fees and incentive awards to named Plaintiffs out of the Settlement Fund. The hearing, before United States District Judge Faith S. Hochberg, has been scheduled for July 31, 2014 at 10 a.m., at the United States District Court for the District of New Jersey, Martin Luther King, Jr. Federal Building & U.S. Courthouse, 50 Walnut Street, Courtroom 4A, Newark, NJ 07101.
- This Notice contains summary information with respect to the Settlement. The terms and conditions of the Settlement are set forth in a Settlement Agreement, dated April 17, 2014 (the “Settlement Agreement”). A complete copy of the Settlement Agreement is available through any of the methods listed in response to Question 20 below.

PLEASE READ THIS NOTICE CAREFULLY AND COMPLETELY. IF YOU ARE A CLASS MEMBER TO WHOM THIS NOTICE IS ADDRESSED, THE SETTLEMENT WILL AFFECT YOUR RIGHTS. YOU ARE NOT BEING SUED IN THIS MATTER. YOU DO NOT HAVE TO APPEAR IN COURT, AND YOU DO NOT HAVE TO HIRE AN ATTORNEY IN THIS CASE. IF YOU ARE IN FAVOR OF THE SETTLEMENT, YOU DO NOT NEED TO DO ANYTHING. IF YOU DISAPPROVE, YOU MAY OBJECT TO THE SETTLEMENT PURSUANT TO THE PROCEDURES DESCRIBED BELOW.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
<p>YOU CAN DO NOTHING</p> <p>NO ACTION IS NECESSARY NOW TO RECEIVE PAYMENT</p>	<p>If the Settlement is approved by the Court and you are a Class Member, you will not need to do anything right now to receive a payment. In a few months, a claim form will be mailed to all members of the Class setting out each Class Member's recovery from the Settlement Fund. The portion, if any, of the Settlement Fund to be allocated to you will be calculated on a <i>pro rata</i> basis based on your combined Class Purchases of Neurontin and generic gabapentin in units during a relevant portion of the Class Period as part of the implementation of the Settlement. To receive your share, you will need to sign and return the claim form as directed.</p>
<p>GO TO A HEARING</p>	<p>If you have submitted a written objection to the Settlement, you may (but do not have to) attend the Court hearing about the Settlement and present your objection to the Court. You may attend the hearing even if you do not file a written objection, but you will only be allowed to speak at the hearing if you file written comments in advance of the hearing.</p>

- These rights and options – **and the deadlines to exercise them** – are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement.

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SUMMARY OF SETTLEMENT

A Settlement Fund consisting of \$190,000,000.00 (one hundred ninety million dollars) in cash, plus interest, is being established in this case. The net cash amount in the Settlement Fund, after payment of any taxes, expenses, Court-approved attorneys' fees and costs, and any incentive awards to the named Plaintiffs who served as class representatives in this case will be allocated among Class Members *pro rata*, according to a Plan of Allocation, approval of which will simultaneously be sought from the Court as part of the Settlement.

As with any litigated case, the Plaintiffs would face an uncertain outcome if this Lawsuit were to continue against the Defendants. Continued litigation could result in a judgment or verdict greater or less than the recovery under the Settlement Agreement, or in no recovery at all.

Throughout this case, the Plaintiffs and the Defendants have disagreed on both liability and damages, and they do not agree on the amount that would be recoverable even if the Plaintiffs were to prevail at trial. The Defendants have denied, and continue to deny, the claims and contentions alleged by the Plaintiffs, that they are liable at all to the Class, or that the Class has suffered any damages for which the Defendants could be legally responsible. Nevertheless, the Defendants have taken into account the uncertainty and risks inherent in any litigation, particularly in a complex case such as this one, and have concluded that it is desirable that the Lawsuit be fully and finally settled as to them on the terms and conditions set forth in the Settlement Agreement.

BASIC INFORMATION

1. Why did I get this Notice?

You received this notice because you may have purchased Neurontin directly from Pfizer between December 11, 2002 and August 31, 2008 and may have also purchased generic gabapentin.

You have received this notice because, as a potential member of the Class certified by the Court, you have a right to know about the Settlement, and about all of your options, before the Court decides whether to approve the Settlement. If the Court approves the Settlement, and after any objections and appeals are resolved, the net amount of the Settlement Fund will be allocated among Class Members according to a Court-approved Plan of Allocation (summarized below in response to Question 9). This notice describes the Lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

2. What is this lawsuit about?

The Lawsuit claims that Pfizer violated federal antitrust laws by illegally delaying the entry of generic versions of the prescription drug Neurontin. The active ingredient in Neurontin is gabapentin anhydrous. The Lawsuit claims that Pfizer delayed competition from less expensive generic versions of Neurontin by executing a multifaceted scheme involving, among other things, improperly listing certain patents with the U.S. Food and Drug Administration, engaging in illegal promotion and sales of Neurontin for unapproved uses, filing and maintaining sham litigations with

respect to certain patents, and making misrepresentations to the patent courts. Plaintiffs allege that by engaging in the alleged scheme Pfizer delayed competition from less expensive generic versions of Neurontin and was able to maintain its monopoly in the market for gabapentin anhydrous, improperly causing direct purchasers of Neurontin to pay artificially inflated prices for gabapentin products. The Lawsuit seeks damages representing three times the amount that was overpaid as a result of the allegedly illegal conduct, plus interest, attorneys' fees and costs.

Pfizer denies that it did anything wrong and maintains that any conduct it engaged in was reasonable and based upon independent, legitimate business and economic justifications, without the purpose or effect of injuring competition. Pfizer also claims that its actions have had procompetitive effects that benefited competition and consumers.

The Court has not decided whether Pfizer violated any laws.

The Lawsuit is known as *In re Neurontin Antitrust Litigation*, Civil Action No. 02-1390. Judge Faith S. Hochberg of the United States District Court for the District of New Jersey is overseeing this class action.

3. What is a class action?

In a class action, one or more entities called "Class Representatives" sue on behalf of other entities with similar claims. In this case, there are three (3) Class Representatives: Louisiana Wholesale Drug Co., Inc. ("LWD"); Meijer, Inc.; and Meijer Distribution, Inc. (together, "Meijer").

The Class Representatives and the entities on whose behalf they have sued are together a "Class" or "Class Members." They are also called the "Plaintiffs." Their attorneys are called "Plaintiffs' Counsel" or "Class Counsel."

The companies that have been sued are Pfizer, Inc. and Warner-Lambert Company LLC, which became a wholly-owned subsidiary of Pfizer Inc. on or about June 19, 2000. They are called the "Defendants" or "Pfizer."

In a class action lawsuit, one court resolves the issues for everyone in the class, except for those class members who exclude themselves from the class.

4. Why is this lawsuit a class action?

The Court has decided that the Lawsuit can be a class action because it found that the Lawsuit meets the requirements of Federal Rule of Civil Procedure 23, which governs class actions in federal courts.

5. What has happened in this case so far?

Extensive fact and expert discovery has been taken in this case. The Court denied Defendants' motion to dismiss on August 28, 2009, ruling that Plaintiffs had properly pled violations of § 2 of the Sherman Act and the case could continue. On January 25, 2011 the Court held that the case could proceed as a class action on behalf of all members of the Class. On August 8, 2013, the Court

denied Defendants' motion for summary judgment and Plaintiffs' motion for partial summary judgment.

6. Why is there a Settlement?

This Settlement is the product of extensive negotiations between Class Counsel and Defendants' counsel. After twelve years of working on the case, and after thoroughly investigating the facts and legal issues involved, and after extensive mediation with an independent mediator, Defendants agreed to pay a total of \$190 million, plus interest, to resolve the antitrust claims that Plaintiffs brought against them. The Court has not decided in favor of Plaintiffs or Defendants. The Class Representatives and the lawyers representing them and the Class believe that the \$190 million, plus interest, cash Settlement is fair and in the best interests of Class Members. By agreeing to the Settlement, the parties will avoid the cost of completing the trial and avoid the risks that they would lose the trial, risks involved with a subsequent trial to determine the amount of damages, if any, or subsequent appeals of either or both trials. As a result of the Settlement, Class Members will be guaranteed compensation without undue delay.

7. How do I know whether I am part of the Settlement?

The proceeds of this Settlement will be allocated only to members of the Class on a *pro rata* basis, and then only according to a Court-approved Plan of Allocation. You are a member of the Class if you fall within the Class definition approved by Judge Faith S. Hochberg. In her Order certifying the Class in this case, Judge Hochberg decided that all persons and entities in the United States that purchased Neurontin directly from Defendants at any time during the period of December 11, 2002 through August 31, 2008 and that have purchased generic gabapentin are Class Members. Judge Hochberg excluded Defendants and their parents, employees, subsidiaries, affiliates, and franchisees from the Class. She also excluded all government entities.

The following entities are also excluded from the Class: CVS Pharmacy Inc., Caremark, L.L.C., Rite Aid Corporation, Rite Aid HDQTRS Corp., Walgreen Co., American Sales Co, Inc., HEB Grocery Co. LP, Safeway Inc., SuperValu Inc., and The Kroger Co., in their own right as direct purchasers of Neurontin from Pfizer and as assignees limited to their purchases of Neurontin from Class Members. Any claims by those entities, including assigned claims, are not included within the Settlement and will not be compensated from the Settlement Fund.

If you are not sure whether you are included in the Class, you may call or write to the lawyers representing the Class in this case at the telephone numbers, addresses, or web sites listed in response to Question 12 below.

8. What does the Settlement provide?

A Settlement Fund consisting of \$190 million, plus interest, in cash, has been established in this case. The net amount in the Settlement Fund, after payment of (and establishment of reserves for) any taxes and Court-approved costs, attorneys' fees, and expenses, including any Court-approved incentive awards to be paid to the Class Representatives, will be allocated to Class Members according to a Plan of Allocation to be approved by the Court.

Generally, the Class Representatives and the Class Members will release the Defendants from all claims arising out of conduct that was or could have been asserted in the Lawsuit regarding the factual allegations in the complaints filed with the Court. Specifically, upon the Settlement becoming final, Defendants and their past, present and future parents, subsidiaries, divisions, affiliates, joint ventures, stockholders, officers, directors, management, supervisory boards, insurers, general or limited partners, employees, agents, trustees, associates, attorneys and any of their legal representatives (and the predecessors, heirs, executors, administrators, successors and assigns of each of the foregoing) (the "Released Parties") will be unconditionally, fully and finally released and forever discharged from all manner of claims, debts, obligations, demands, actions, suits, causes of action, damages whenever incurred, liabilities of any nature whatsoever, including costs, expenses, penalties and attorneys' fees, known or unknown, suspected or unsuspected, accrued in whole or in part, in law or equity, that Plaintiffs or any member or members of the Class (including any of their past, present or future officers, directors, insurers, general or limited partners, divisions, stockholders, agents, attorneys, employees, legal representatives, trustees, parents, associates, affiliates, joint ventures, subsidiaries, heirs, executors, administrators, predecessors, successors and assigns, acting in their capacity as such) (the "Releasers"), whether or not they object to the Settlement and whether or not they make a claim upon or participate in the Settlement Fund, ever had, now has, or hereafter can, shall or may have, directly, representatively, derivatively or in any other capacity, arising out of or relating in any way to any conduct alleged or asserted in any of Plaintiffs' filings in the Lawsuit, relating to any alleged delay in the marketing, sale, manufacture, pricing, or purchase of, or the enforcement of intellectual property related to Neurontin or its generic equivalents, except the Settlement does not release any claims between Plaintiffs, members of the Class and the Released Parties concerning product liability, breach of contract, breach of warranty or personal injury (the "Released Claims").

In addition, upon the Settlement becoming final, Plaintiffs and each Class member, on behalf of themselves and all other Releasers, will expressly waive, release and forever discharge any and all provisions, rights and benefits conferred by § 1542 of the California Civil Code, which reads:

Section 1542. General Release; extent. A general release does not extend to claims which the creditor does not know or suspect to exist in his or her favor at the time of executing the release, which if known by him or her must have materially affected his or her settlement with the debtor;

or by any law of any state or territory of the United States or other jurisdiction, or principle of common law, which is similar, comparable or equivalent to § 1542 of the California Civil Code. Each Class Member will also expressly waive and fully, finally and forever settle, release and discharge, upon the Settlement becoming final, any known or unknown, suspected or unsuspected, asserted or unasserted, contingent or non-contingent claim that would otherwise fall within the definition of Released Claims, whether or not concealed or hidden, without regard to the subsequent discovery or existence of such different or additional facts. Each Class Member will also waive and fully, finally and forever settle, release and discharge any and all claims it may have against any Released Party under § 17200, *et seq.*, of the California Business and Professions Code or any similar comparable or equivalent provision of the law of any other state or territory of the United States or other jurisdiction, which claims are expressly incorporated into the definition of Released Claims.

The releases set forth above will not release any claims arising between Plaintiffs, Class Members and the Released Parties concerning product liability, breach of contract, breach of warranty or personal injury.

All costs, fees and expenses related to this litigation and the Settlement are to be paid solely out of the proceeds of the Settlement Fund. Class Counsel intends to seek, solely from the Settlement Fund, attorneys' fees totaling up to 33 1/3% of the Settlement Fund plus the reimbursement of reasonable costs and expenses incurred in the prosecution of the Lawsuit not to exceed \$3 million, plus interest thereon. Class Counsel's application for an award of attorneys' fees will be filed with the Court and made available for download and/or viewing on or before July 1, 2014 on the following internet sites maintained by Class Counsel: www.garwingerstein.com and www.kaplanfox.com. An application will also be made to the Court for an incentive award of one-hundred thousand dollars (\$100,000.00) for each of LWD and Meijer, to compensate them for their participation in, and prosecution of, this case on behalf of the Class, which has included, among other things, production of documents and electronic data, providing written discovery responses, appearing for depositions, supplying affidavits, and regular communication with counsel. Class Counsel will file their application for an award of attorneys' fees, reimbursement of costs and expenses, and for incentive awards for the Class Representatives with the Clerk of the United States District Court for the District of New Jersey, Martin Luther King, Jr. Federal Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101 on or before July 1, 2014. The application will be available for inspection during normal business hours at the office of the Clerk, in addition to the web sites noted above.

This is only a summary of the proposed Settlement and is qualified in its entirety by the terms of the actual Settlement Agreement. A copy of the Settlement Agreement, including the releases, is on public file with the United States District Court for the District of New Jersey at the above address during normal business hours and is also available for download and/or viewing on the following websites maintained by Class Counsel and the Claims Administrator, respectively, at: www.garwingerstein.com, www.kaplanfox.com and www.berdonclaims.com.

The Court has scheduled a Fairness Hearing in order to determine whether the proposed Settlement, request for attorneys' fees and costs, and Class Representative incentive awards should be finally approved. If the Court finally approves the Settlement, the Court will also establish a Plan of Allocation that will be followed to distribute the net Settlement Fund to Class Members, following the payment of attorneys' fees and expenses, costs, taxes, and any incentive awards for the Class Representatives, as described in response to Question 9 below.

9. How much will my payment be?
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Each Class Member's proportionate, pro-rata, recovery will be determined using a Court-approved Plan of Allocation. Under the proposed Plan of Allocation, your share of the net Settlement proceeds will depend on the total amount of Neurontin that you purchased directly from Pfizer combined with the total amount of generic gabapentin that you purchased during a relevant portion of the Class Period (December 11, 2002 through August 31, 2008) ("Class Purchases"). Those who had more Class Purchases will get more money than those who had fewer Class Purchases. Specifically, all Class Members will receive a *pro rata* share of the net Settlement Fund in proportion to their Class Purchases. You are not responsible for calculating the amount you may be entitled to receive under the Settlement. This calculation will be done using electronic sales data provided by Pfizer and various generic gabapentin suppliers during the Lawsuit as part of the implementation of the Settlement.

Money from the Settlement will only be distributed to Class Members if the Court grants final approval of the Settlement.

10. How can I get a payment?

If the Settlement is approved by the Court, all Class Members will receive a Claim Form to request a pro rata share of the Settlement Fund. Class Members will be asked to verify the accuracy of the information in the Claim Form, and to sign and return the form according to the directions on the Form, which will also include a release of claims against Defendants.

11. When would I get my payment?

Payment is conditioned on several matters, including the Court's approval of the Settlement and such approval being final and no longer subject to any appeals to any court. Upon satisfaction of various conditions, the net Settlement Fund will be allocated to Class Members on a *pro rata* basis pursuant to the Plan of Allocation as soon as possible after final approval has been obtained for the Settlement. Any appeal of the final approval could take several years. Any accrued interest on the Settlement Fund will be included, *pro rata*, in the amount paid to the Class Members. The Settlement Agreement may be terminated on several grounds, including if the Court does not approve or if it materially modifies the Settlement. Should the Settlement Agreement be terminated, the Settlement will be terminated and the Lawsuit will proceed as if the Settlement had not been reached.

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in this case?

Judge Hochberg previously decided that the two law firms listed below, along with some other law firms, were qualified to represent you and all Class Members. These two law firms are called "Direct Purchaser Plaintiffs' Co-Lead Counsel." These two law firms and the other law firms serving as Class Counsel are experienced in handling similar cases against other companies. You will not be charged directly by any of these law firms:

Garwin Gerstein & Fisher, LLP
Wall Street Plaza
88 Pine Street, 10th Floor
New York, NY 10005
212-398-0055
www.garwingerstein.com

Kaplan Fox & Kilsheimer LLP
850 Third Avenue, 14th Floor
New York, NY 10022
212-687-1980
www.kaplanfox.com

13. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. However, if you wish to do so, you may retain your own lawyer at your own expense.

14. How will the lawyers be paid?

If the Court approves the Settlement, the Court will be asked to approve a fee to Class Counsel and reimburse them for the costs and expenses they have paid in conducting the litigation solely out of the Settlement Fund. Class Counsel intends to seek, solely from the Settlement Fund, attorneys' fees of up to 33⅓% of the gross Settlement Fund. In addition, Class Counsel intends to seek, from the Settlement Fund, reimbursement of reasonable costs and expenses incurred in the prosecution of this case, not to exceed \$3 million. If the Court grants Class Counsel's requests, the fees and expenses would be deducted from the Settlement Fund, and thus no Class Member will be asked to pay attorneys' fees or expenses out of pocket in connection with this Lawsuit.

THE COURT'S FAIRNESS HEARING

15. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Fairness Hearing at 10 a.m. on July 31, 2014, at the United States District Court for the District of New Jersey, Martin Luther King, Jr. Federal Building & U.S. Courthouse, 50 Walnut Street, Courtroom 4A, Newark, NJ 07101. At this hearing, the Court will consider: (1) whether the Settlement is fair, reasonable and adequate; (2) the proposed Plan of Allocation for the Settlement Fund among Class Members; (3) Class Counsel's application for an award of attorneys' fees and disbursement of expenses and costs; and (4) the application for incentive awards of \$100,000.00 for each of the Class Representatives, LWD and Meijer. If there are objections, the Court will consider them. Judge Hochberg will listen to people who have asked to speak at the hearing. After the hearing, the Court will decide whether to approve the Settlement.

16. How do I tell the Court that I don't like the Settlement?

If you do not like the Settlement or any of its provisions, you may tell the Court that you object to the Settlement. Objecting is simply advising the Court that you do not like something about the Settlement. If you object, you can give reasons why you think the Court should not approve the Settlement, the attorneys' fee request, or any other aspect of the relief requested, and the Court will consider your views. To object, you must send a letter via first class U.S. mail saying that you object to the Settlement of *In re Neurontin Antitrust Litigation*, Civil Action No. 02-1390. You must include, in a prominent location, the name of the case (*In re Neurontin Antitrust Litigation*), the Case No. (Master Docket No. 02-1390 (FSH)) and the Judge's name (Hon. Faith S. Hochberg). Be sure to include your name, address, telephone number, your signature and the reasons you object to the settlement. Mail the objection so that it is postmarked no later than July 17, 2014, to *In re Neurontin Antitrust Litigation*, Clerk of the United States District Court for the District of New Jersey, Martin Luther King, Jr. Federal Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101. You must also send a copy of your objection to Class Counsel and to counsel for Defendant, whose addresses are:

On behalf of Class Counsel, Direct Purchaser Plaintiffs and the Class:

Bruce E. Gerstein, Esq.
GARWIN GERSTEIN & FISHER LLP
Wall Street Plaza
88 Pine Street, 10th Floor
New York, NY 10005

Richard J. Kilsheimer, Esq.
KAPLAN FOX & KILSHEIMER LLP
850 Third Avenue, 14th Floor
New York, NY 10022

On behalf of Defendants:

Aidan Synnott, Esq.
PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019

17. Do I have to come to the hearing?

No. Class Counsel (the lawyers representing the Direct Purchaser Plaintiffs and the Class) will answer any questions that Judge Hochberg may have. You are welcome to come to the hearing at your own expense. If you send a written objection, you do not have to come to the Court to talk about it. So long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but that is not necessary.

18. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. Otherwise, you may not be allowed to speak at the Fairness Hearing. If you wish to speak at the Fairness Hearing, or you wish to have an attorney representing you at your own expense speak at the Fairness Hearing, you must mail a Notice of Intention to Appear, postmarked no later than July 17, 2014 to the Clerk of the United States District Court for the District of New Jersey, Martin Luther King, Jr. Federal Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101. Your Notice of Intent must include, in a prominent location, the name of the case (*In re Neurontin Antitrust Litigation*), the Case No. (Master Docket No. 02-1390 (FSH)) and the Judge's name (Hon. Faith S. Hochberg). Be sure to include your name, address, telephone number, and your signature. You must also send a copy of your request to Class Counsel and to counsel for Defendant, whose addresses are:

On behalf of Class Counsel, Direct Purchaser Plaintiffs and the Class:

Bruce E. Gerstein, Esq.
GARWIN GERSTEIN & FISHER LLP
Wall Street Plaza
88 Pine Street, 10th Floor
New York, NY 10005

Richard J. Kilsheimer, Esq.
KAPLAN FOX & KILSHEIMER LLP
850 Third Avenue, 14th Floor
New York, NY 10022

On behalf of Defendants:

Aidan Synnott, Esq.
PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019

IF YOU DO NOTHING

19. What happens if I do nothing at all now?

If you do nothing, you remain in the Class. You will keep the right to get a share of any recovery that may come from a trial or settlement with Defendants. You will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Pfizer about the legal issues in this case. All of the Court's orders will apply to you and legally bind you.

GETTING MORE INFORMATION

20. How can I get more information?

This Notice is only a summary of the litigation and your rights as a potential Class Member. For more detailed information about this litigation, please refer to the papers on file in this litigation, which may be inspected at the Office of the Clerk, United States District Court for the District of New Jersey, Martin Luther King Building and U.S. Courthouse, 50 Walnut St., Room 4015, Newark, NJ 07101 during regular business hours of each business day. In addition, you may call or write to Class Counsel listed in response to Question 12. You may also contact the Claims Administrator at:

In re Neurontin Antitrust Litigation
c/o Berdon Claims Administration LLC
P.O. Box 9014
Jericho, NY 11753-8914
Telephone: 800-766-3330 (toll-free)
Fax: 516-931-0810
www.berdonclaims.com

where you may also obtain more information and/or request additional copies of this Notice.

Corrections or changes of name or address, or requests for additional copies of this Notice should **not** be directed to the Court, but should be directed **in writing** to the Claims Administrator at the address or fax number listed above.

Any questions which you have concerning the matters contained in this Notice may be directed in writing to:

Bruce E. Gerstein, Esq. - or -
GARWIN GERSTEIN & FISHER LLP
Wall Street Plaza
88 Pine Street, 10th Floor
New York, NY 10005

Richard J. Kilsheimer, Esq.
KAPLAN FOX & KILSHEIMER LLP
850 Third Avenue, 14th Floor
New York, NY 10022

This notice summarizes the proposed Settlement. The complete Settlement is set forth in the Settlement Agreement. You may obtain a copy of the Settlement Agreement or any other documents

relating to the proposed Settlement (such as the motion seeking the Court's preliminary approval of the Settlement and the motion seeking payment to Plaintiffs' Counsel of attorneys' fees, costs, and expenses), in any one of the following four ways:

1. by making a written request to Class Counsel listed in response to Question 12;
2. by visiting the following Internet sites maintained by Class Counsel: www.garwingerstein.com or www.kaplanfox.com, and by the Claims Administrator: www.berdonclaims.com;
3. by making a written request to the Claims Administrator at the address listed above; or
4. by visiting in person the office of the Clerk of the United States District Court for the District of New Jersey.

**PLEASE DO NOT WRITE OR CALL THE COURT
OR THE CLERK'S OFFICE FOR INFORMATION.**

DATE: May 12, 2014

BY ORDER OF THE COURT
Honorable Faith S. Hochberg
United States District Judge

EXHIBIT B

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

SUMMARY NOTICE OF PROPOSED CLASS ACTION SETTLEMENT, MOTION
FOR ATTORNEYS' FEES, AND HEARING REGARDING SETTLEMENT

TO: ALL PERSONS OR ENTITIES WHO HAVE PURCHASED NEURONTIN DIRECTLY FROM PFIZER, INC. AND WARNER-LAMBERT AT ANY TIME DURING THE PERIOD OF DECEMBER 11, 2002, THROUGH AUGUST 31, 2008 AND WHO HAVE ALSO PURCHASED GENERIC GABAPENTIN, EXCLUDING: (1) GOVERNMENTAL ENTITIES; (2) DEFENDANTS AND THEIR OFFICERS, DIRECTORS, MANAGEMENT AND EMPLOYEES, SUBSIDIARIES AND AFFILIATES.

YOUR RIGHTS COULD BE AFFECTED.

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

Nature of the Class Action: If you made at least one purchase of the brand name drug Neurontin directly from one of the defendants in this case and have also purchased generic gabapentin, your rights may be affected by a class action lawsuit, *In re Neurontin Antitrust Litigation*, Master Docket No. 02-cv-1390 (FSH) (D.N.J.) (the "Class Action"), now pending before the United States District Court for the District of New Jersey (the "Court"). This case was brought by Louisiana Wholesale Drug Company, Inc., Meijer, Inc. and Meijer Distribution, Inc. (collectively, "Plaintiffs") on behalf of themselves and other similarly situated direct purchasers of Neurontin that fall within the definition of the Class against Defendants Pfizer Inc. and Warner-Lambert Company LLC (collectively, "Pfizer" or "Defendants").

Plaintiffs allege that Pfizer violated federal antitrust laws by illegally delaying the entry of generic versions of the prescription drug Neurontin. The active ingredient in Neurontin is gabapentin anhydrous. Plaintiffs allege that Pfizer delayed competition from less expensive generic versions of Neurontin by executing a multifaceted scheme involving, among other things, improperly listing certain patents in the Orange Book, engaging in illegal promotion and sales of Neurontin for unapproved uses, filing and maintaining sham litigations with respect to certain patents, and making misrepresentations to the patent courts. Plaintiffs allege that by engaging in the alleged scheme Pfizer delayed competition from less expensive generic versions of Neurontin and was able to maintain its monopoly in the market for gabapentin anhydrous, improperly causing direct purchasers of Neurontin to pay artificially inflated prices for gabapentin products. Plaintiffs seek damages representing three times the amount that was overpaid as a result of the allegedly illegal conduct, plus interest, attorneys' fees and costs.

The Court has certified a class of direct purchasers of Neurontin and preliminarily approved a proposed Settlement of the Class Action. The Settlement provides for payment by Defendants of \$190,000,000.00 (one hundred ninety million dollars) plus interest into an escrow account (the "Settlement Fund"). Plaintiffs will move the Court to approve the proposed Settlement, the allocation of the net Settlement Fund to the members of the Class (defined below), and compensation to Class Counsel for expenses, attorneys' fees and incentive awards to named Plaintiffs out of the Settlement Fund.

The Class: By order dated January 25, 2011, the Court ruled that this lawsuit may be maintained by Plaintiffs on behalf of the Class consisting of:

All persons or entities in the United States that purchased Neurontin from Pfizer at any time during the period of December 11, 2002 through August 31, 2008 and who have purchased generic gabapentin. Excluded from the Class are Defendants and each of their respective parents, employees, subsidiaries, affiliates, and franchisees, and all government entities.

Also excluded from the Class are: CVS Pharmacy Inc., Caremark, L.L.C., Rite Aid Corporation, Rite Aid HDQTRS Corp., Walgreen Co., American Sales Co, Inc., HEB Grocery Co. LP, Safeway Inc., SuperValu, Inc., and The Kroger Co., in their own right as direct purchasers of Neurontin from Pfizer and as assignees limited to their purchases of Neurontin from Class members.

If you bought Neurontin only from a source other than Defendants (for example, if you only bought Neurontin directly from a wholesaler or a retailer, and did not buy any Neurontin directly from either Pfizer or Warner-Lambert) and/or you have not made any purchases of generic gabapentin, you are *not* a member of the Class on whose behalf this suit was maintained.

The Final Approval Hearing before the Honorable Faith S. Hochberg has been scheduled for July 31, 2014 at 10 a.m. at the United States District Court for the District of New Jersey, Martin Luther King, Jr. Federal Building & U.S. Courthouse, 50 Walnut Street, Courtroom 4A, Newark, NJ 07101, to approve the Settlement, the plan for allocating the net Settlement Fund to members of the Class, Class Counsel's request for attorneys' fees, reimbursement of expenses, and for incentive awards to named Plaintiffs to be paid out of the Settlement Fund.

Mailed Notice: Entities that have been identified as possible members of this Class are being advised by mail of their rights with respect to this lawsuit. If you believe you are a Class member, but have not yet received the more detailed Notice of Proposed Settlement of Class Action ("Mailed Notice"), you may obtain a copy by contacting the Claims Administrator at: *In re Neurontin Antitrust Litigation*, c/o Berdon Claims Administration LLC., P.O. Box 9014, Jericho, NY 11753-8914; Phone: 800-766-3330; Fax: 516-931-0810; or via the website www.berdonclaims.com. The Mailed Notice provides a more detailed explanation of your rights in this litigation.

If You Do Nothing, you will remain in the Class. If the Settlement is approved by the Court and you are a Class member, you will not need to do anything right now to receive a payment.

To Object to Any Part of the Settlement, but stay in this class action lawsuit and keep the right to share in the Settlement, you may write to the Court and counsel about why you do not approve of the Settlement. Instructions and deadlines can be found in the Mailed Notice.

To Get More Information, please contact the Claims Administrator, or visit www.garwingerstein.com or www.kaplanfox.com.

PLEASE DO NOT WRITE OR CALL THE COURT OR THE CLERK'S OFFICE FOR INFORMATION

Dated: May 12, 2014

BY ORDER OF THE COURT