

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

**IN RE SUBOXONE (BUPRENORPHINE
HYDROCHLORIDE AND NALOXONE)
ANTITRUST LITIGATION**

MDL No. 2445

Master File No. 2:13-MD-2445-MSG

THIS DOCUMENT RELATES TO:

All Direct Purchaser Class Actions

**NOTICE OF CLASS COUNSEL’S SUPPLEMENTAL SUBMISSION REGARDING
CLASS COUNSEL’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES,
REIMBURSEMENT OF EXPENSES, AND SERVICE AWARDS FOR THE CLASS
REPRESENTATIVES**

Class Counsel hereby submit this supplemental submission to their Motion for an Award of Attorneys’ Fees, Reimbursement of Expenses and Service Awards for the Class Representatives. *See* ECF No. 992. Class Counsel’s supplemental submission is being made after Class Counsel have consulted with the three largest class members (hereinafter, the “National Wholesalers”) who collectively represent approximately 93% of the direct purchases that are the subject of the claims in the instant litigation.

In their initial Motion, Class Counsel respectfully requested that the Court enter an order awarding Class Counsel \$125,672,591.21 (or one-third (33⅓%) of the settlement amount net of reimbursed expenses and service awards to the class representatives), plus a proportionate amount of any interest accrued since the settlement was escrowed. *See* ECF No. 992-1 (Mem. of Law) at p. 27; ECF No. 992-2 (Gerstein Decl. at ¶ 87). That award would equate to a lodestar multiplier of 1.57. *See* ECF No. 992-1 at p. 24; ECF No. 992-2 at ¶ 87.

Through this supplemental submission, Class Counsel hereby respectfully request that the Court enter an order awarding Class Counsel \$120,645,687.56 (or thirty-two percent (32%) of the settlement amount net of reimbursed expenses and service awards to the class representatives), plus a proportionate amount of any interest accrued since the settlement was escrowed. That award would equate to a lodestar multiplier of 1.50. The National Wholesalers have advised Class Counsel that Class Counsel may represent to the Court that the revised award sought through this supplemental submission is acceptable to the National Wholesalers.

Dated: January 16, 2024

Respectfully Submitted,

/s/ Bruce E. Gerstein

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CERTIFICATE OF SERVICE

I hereby certify that on January 16, 2024, I caused the above to be publicly filed on the Court's CM/ECF system.

Respectfully submitted,

/s/ Bruce E. Gerstein
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