

**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

**DECLARATION OF BRUCE E. GERSTEIN IN SUPPORT OF DIRECT PURCHASER
CLASS PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF PROPOSED
SETTLEMENT, APPROVAL OF THE FORM AND MANNER OF NOTICE TO THE
CLASS AND PROPOSED SCHEDULE FOR A FAIRNESS HEARING**

I, Bruce E. Gerstein, hereby declare as follows:

1. I am an attorney admitted *pro hac vice* in this matter. I am a Managing Partner at Garwin Gerstein & Fisher LLP and am Co-Lead Counsel for the Direct Purchaser Class. I submit this declaration in support of Direct Purchaser Class Plaintiffs' Motion for Preliminary Approval of Proposed Settlement, Approval of the Form and Manner of Notice to the Class and Proposed Schedule for a Fairness Hearing.

2. Attached as **Exhibit 1** hereto is a true and correct copy of the Settlement Agreement (including Exhibits A-D thereto) made and entered into on October 22, 2023 by and between Indivior Inc., f/k/a Reckitt Benckiser Pharmaceuticals, Inc.; and Burlington Drug Company, Inc., Rochester Drug Co-Operative, Inc., and Meijer, Inc. and Meijer Distribution, Inc., individually and on behalf the certified Direct Purchaser Class.

3. Attached as **Exhibit 2** hereto is a true and correct copy of Direct Purchaser Class Plaintiffs' Plan of Allocation for the Direct Purchaser Class.

4. Attached as **Exhibit 3** hereto is a true and correct copy of the Dr. Russell L. Lamb's Declaration Related to Proposed Settlement Allocation Plan, dated October 24, 2023.

I hereby declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed in New York, New York on October 25, 2023.

/s/ Bruce E. Gerstein

Bruce E. Gerstein