

**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 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**

**PLEASE TAKE NOTICE** that upon the accompanying Memorandum of Law, and Declaration of Bruce E. Gerstein and Exhibits 1-3 thereto, Direct Purchaser Class Plaintiffs hereby move for the entry of the Preliminary Approval Order proposed herewith, which provides for: preliminary approval of the proposed Settlement Agreement; approval of a proposed Escrow Agreement; approval of the proposed form and manner of notice to the Direct Purchaser Class; and the establishment of a proposed schedule leading up to and including the Fairness Hearing.

Dated: October 25, 2023

Respectfully Submitted,

/s/ Bruce E. Gerstein

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 25, 2023, I caused the above to be publicly filed on the Court's CM/ECF system.

Respectfully submitted,

/s/ Bruce E. Gerstein  
Bruce E. Gerstein