UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS

IN RE: OPANA ER ANTITRUST

LITIGATION

THIS DOCUMENT RELATES TO: **All Direct Purchaser Class Actions**

MDL DOCKET NO. 2580 Case No. 1:14-cv-10150 (HDL)

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 attached thereto, Direct Purchaser Class Plaintiffs hereby move for the entry of the Preliminary Approval Order proposed herewith, which provides for: preliminary approval of a 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: July 19, 2022 Respectfully Submitted:

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