

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

IN RE: OPANA ER ANTITRUST LITIGATION	MDL DOCKET NO. 2580
THIS DOCUMENT RELATES TO: All Direct Purchaser Class Actions	Case No. 1:14-cv-10150 (HDL)

**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:

I am an attorney admitted *pro hac vice* in this matter. I am Co-Lead Counsel for the Direct Purchaser Class and a Managing Partner at Garwin Gerstein & Fisher LLP. I submit this declaration in support of Direct Purchaser Class Plaintiffs' Motion for Preliminary Approval.

1. Attached as Exhibit 1 hereto is a true and correct copy of the Settlement Agreement made and entered into on July 15, 2022 by and between Impax Laboratories, Inc.; and Value Drug Company and Meijer, Inc. and Meijer Distribution, Inc., individually and on behalf of the certified Direct Purchaser Class.

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

3. Attached as Exhibit 3 hereto is a true and correct copy of the Declaration of Jeffrey J. Leitzinger, Ph.D. Related to Proposed Allocation Plan and Net Settlement Fund Allocation, dated July 19, 2022.

I hereby declare under the penalty of perjury that the foregoing is true and correct and that this declaration was executed in New York, New York on July 19, 2022.

Dated: July 19, 2022

Respectfully submitted:

/s/ Bruce E. Gerstein

Bruce E. Gerstein
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CERTIFICATE OF SERVICE

I hereby certify that on July 19, 2022, I caused the above to be filed by CM/ECF system.

Respectfully submitted,

/s/ Bruce E. Gerstein
Bruce E. Gerstein