

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re: Seroquel XR (Extended Release
Quetiapine Fumarate) Antitrust Litig.

Master Dkt. No. 20-1076-CFC

This Document Relates To:

All Direct Purchaser Class Actions

**DIRECT PURCHASER CLASS PLAINTIFFS’
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF PROPOSED SETTLEMENTS,
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 Brief, and Declaration of Jonathan M. Gerstein and Exhibits 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 Agreements;¹ directing Notice to Class members pursuant to the proposed Notice Plan; appointing the Claims Administrator and the Escrow Agent; setting forth the timing and procedures for, among other things, any Objections to the Settlements; and scheduling a final Fairness Hearing.

¹ All capitalized terms are defined in the Brief.

DATED: May 29, 2025

OF COUNSEL:

Bruce E. Gerstein (*pro hac vice*)
Jonathan Gerstein (*pro hac vice*)
David B. Rochelson (*pro hac vice*)
GARWIN GERSTEIN &
FISHER LLP
88 Pine Street, Suite 2810
New York, NY 10005
(212) 398-0055
bgerstein@garwingerstein.com
jgerstein@garwingerstein.com
drochelson@garwingerstein.com

*Lead Counsel for the Direct
Purchaser Class and Counsel for
Smith Drug Company*

David F. Sorensen (*pro hac vice*)
Caitlin G. Coslett (*pro hac vice*)
Andrew C. Curley (*pro hac vice*)
Julia R. McGrath (*pro hac vice*)
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
(215) 875-3000
dsorensen@bm.net
ccoslett@bm.net
acurley@bm.net
jmcgrath@bm.net

Respectfully submitted,

COOCH AND TAYLOR, P.A.

/s/ Carmella P. Keener
Carmella P. Keener (DE # 2810)
The Brandywine Building
1000 N. West Street, Suite 1500
P.O. Box 1680
Wilmington, DE 19899-1680
(302) 984-3816
ckeener@coochtaylor.com

*Counsel for Smith Drug Company and
the Direct Purchaser Class*

Peter Kohn (*pro hac vice*)
Neill Clark (*pro hac vice*)
FARUQI & FARUQI LLP
1617 JFK Blvd, Suite 1550
Philadelphia, PA 19103
(215) 277-5770
pkohn@faruqilaw.com
nclark@faruqilaw.com

Russell Chorush (*pro hac vice*)
Christopher M. First (*pro hac vice*)
Kyle S. Ruvolo (*pro hac vice*)
HEIM PAYNE & CHORUSH LLP
609 Main Street, Suite 3200
Houston, TX 77002
(713) 221-2000
rchorush@hpcllp.com
cfirst@hpcllp.com
kruvolo@hpcllp.com

Stuart E. Des Roches (*pro hac vice*)
Dan Chiorean (*pro hac vice*)
Thomas Maas (*pro hac vice*)
ODOM & DES ROCHES LLC
650 Poydras Street, Suite 2020
New Orleans, LA 70130
(504) 522-0077
stuart@odrlaw.com
dchiorean@odrlaw.com
tmaas@odrlaw.com

Susan Segura (*pro hac vice*)
David C. Raphael (*pro hac vice*)
Erin R. Leger (*pro hac vice*)
SMITH SEGURA RAPHAEL &
LEGER LLP
221 Ansley Blvd
Alexandria, LA 71303
(318) 445-4480
ssegura@ssrllp.com
draphael@ssrllp.com
eleger@ssrllp.com

*Additional Counsel for Smith Drug Company
and the Direct Purchaser Class*

Dianne M. Nast (*pro hac vice*)
Joseph N. Roda (*pro hac vice*)
Michael D. Ford (*pro hac vice*)
NastLaw LLC
1101 Market Street, Suite 2801
Philadelphia, PA 19107
(215) 923-9300
dnast@nastlaw.com
jnroda@nastlaw.com
mford@nastlaw.com

Michael L. Roberts (*pro hac vice*)
Karen S. Halbert (*pro hac vice*)
Stephanie E. Smith (*pro hac vice*)
Sarah E. DeLoach (*pro hac vice*)
Roberts Law Firm US, PC
20 Rahling Circle
Little Rock, AR 72223
(501) 821-5575
mikeroberts@robertslawfirm.us
karenhalbert@robertslawfirm.us
stephaniesmith@robertslawfirm.us
sarahdeloach@robertslawfirm.us

*Counsel for KPH Healthcare Services, Inc. a/k/a Kinney Drugs, Inc.
and the Direct Purchaser Class*