

**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

**DECLARATION OF JONATHAN M. GERSTEIN IN SUPPORT OF  
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**

I, Jonathan M. Gerstein, hereby declare as follows:

I am an attorney admitted *pro hac vice* in this matter. I am a partner at Garwin Gerstein & Fisher LLP, the firm appointed lead counsel for the Direct Purchaser Class in this matter (D.I. 582). 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 May 19, 2025 by and between AstraZeneca Pharmaceuticals LP and AstraZeneca UK Limited (together, “AstraZeneca”); and J M Smith Corporation, d/b/a Smith Drug Company, and KPH Healthcare Services, Inc. a/k/a Kinney Drugs, Inc., individually and on behalf of the certified Direct Purchaser Class.

2. Attached as Exhibit 2 hereto is a true and correct copy of the Settlement Agreement made and entered into on April 28, 2025 by and between Handa Pharmaceuticals, LLC (“Handa”); and J M Smith Corporation, d/b/a Smith Drug Company, and KPH Healthcare Services, Inc. a/k/a Kinney Drugs, Inc., individually and on behalf of the certified Direct Purchaser Class.

3. Attached as Exhibit 3 hereto is a true and correct copy of the Declaration of William W. Wickersham of RG/2 Claims Administration LLC in Support of Plaintiffs’ 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, dated May 28, 2025.

4. Attached as Exhibit 4 hereto are true and correct copies of the proposed notice of settlement to be mailed to the members of the Class.

5. Attached as Exhibit 5 hereto is a true and correct copy of the proposed claim form to be mailed to the members of the Class.

6. Attached as Exhibit 6 hereto is a true and correct copy of Direct Purchaser Class Plaintiffs’ [Proposed] Plan of Allocation for the Direct Purchaser Class.

7. Attached as Exhibit 7 hereto is a true and correct copy of the Declaration of Dr. Russell L. Lamb Related to Proposed Allocation Plan and Net Settlement Fund Allocation, dated May 29, 2025.

8. Attached as Exhibit 8 hereto is a true and correct copy of the Declaration of Liz Lambert Griffin, The Huntington National Bank, attaching as exhibits a brochure summarizing Huntington Bank's business and the agreement made and entered into on May 19, 2025 by Garwin, Gerstein & Fisher LLP ("Class Counsel") and The Huntington National Bank, as Custodian/Escrow agent.

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 May 29, 2025.

Dated: May 29, 2025

Respectfully submitted:

/s/ Jonathan M. Gerstein

Jonathan M. Gerstein  
Garwin Gerstein & Fisher LLP  
88 Pine Street, Suite 2810  
New York, NY 10005  
(212) 398-0055  
jgerstein@garwingerstein.com