

**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

**[PROPOSED] ORDER GRANTING CLASS COUNSEL’S MOTION FOR
AN AWARD OF ATTORNEYS’ FEES, REIMBURSEMENT OF EXPENSES,
AND SERVICE AWARDS TO THE NAMED PLAINTIFFS**

WHEREAS, on July 10, 2025, Class Counsel¹ for the Direct Purchaser Plaintiffs² (“DPPs”) filed a Motion for an Award of Attorneys’ Fees, Reimbursement of Expenses, and Grant of Service Awards to the Class Representatives (“Attorneys’ Fees Motion”) pursuant to Rule 23(h) of the Federal Rules of Civil Procedure following the preliminary approval of the proposed class settlements among DPPs, defendants AstraZeneca Pharmaceuticals LP and AstraZeneca UK Limited (collectively, “AstraZeneca”), and defendant Handa

¹ Class Counsel are Garwin Gerstein & Fisher LLP, Berger Montague PC, Faruqi & Faruqi LLP, Heim Payne & Chorush LLP, Smith Segura Raphael & Leger LLP, Odom & Des Roches LLC, NastLaw LLC, Roberts Law Firm US, PC, and Cooch and Taylor, P.A.

² J M Smith Corporation (“Smith Drug”) and KPH Healthcare Services, Inc. (“KPH”) are, together, the “Named Plaintiffs,” “DPPs” or “Class Representatives.”

Pharmaceuticals, LLC (“Handa,” and together with AstraZeneca, “Defendants”); and WHEREAS, on September 12, 2025, this Court held a hearing on the Attorneys’ Fees Motion, and having carefully considered all the submissions, arguments, and applicable law, and with due deliberation thereon;

NOW, IT IS HEREBY ORDERED THAT:

1. This Order hereby incorporates by reference the definitions in the May 19, 2025 Settlement Agreement between DPPs and AstraZeneca (the “AstraZeneca Settlement Agreement”), D.I. 910-1, and the April 24, 2025 Settlement Agreement between DPPs and Handa (the “Handa Settlement Agreement”), D.I. 910-2, and all capitalized terms used and not otherwise defined herein shall have the meanings set forth therein.

2. Class Counsel have moved for an award of attorneys’ fees, reimbursement of costs and expenses, and service awards for the Named Plaintiffs. Class Counsel request an award of attorneys’ fees in the amount of \$16,849,494.89 (representing 36% of the Settlement Fund after deducting unreimbursed expenses and service awards for the class representatives), plus a proportionate share of the interest earned since the Settlement Amounts were deposited in the Settlement Escrow Account; reimbursement of the reasonable costs and expenses incurred in the prosecution of this Action in the amount of \$4,414,847.53; and service awards

of \$100,000 to each Named Plaintiff. Such motion has been on the docket and otherwise publicly available since July 10, 2025.

3. Upon consideration of the Attorneys' Fees Motion and all related papers, Class Counsel hereby are awarded attorneys' fees totaling \$_____ (together with a proportionate share of the interest thereon from the date the funds were deposited in the Escrow Account until payment of such attorneys' fees, costs, and expenses, at the rate earned by the Settlement Fund) and costs and expenses totaling \$_____. Such fees, costs, expenses, and interest are to be paid solely from the Settlement Fund and only if and after the Settlements become final in accordance with Paragraphs 34 and 39 of the AstraZeneca Settlement Agreement and Paragraphs 34 and 40 of the Handa Settlement Agreement.

4. Upon consideration of Class Counsel's petition for service awards for Named Plaintiffs, each Named Plaintiff hereby is awarded \$_____, to be paid solely from the Settlement Fund and only if and after the Settlement becomes final in accordance with Paragraphs 34 and 39 of the AstraZeneca Settlement Agreement and Paragraphs 34 and 40 of the Handa Settlement Agreement.

5. Lead Counsel have sole discretion to allocate and distribute such attorneys' fees, costs, and expenses among the counsel that have participated in this litigation. The Released Parties shall have no responsibility for, and no liability

whatsoever with respect to, any allocation of attorneys' fees, expenses, costs, or service awards among Class Counsel and/or the Named Plaintiffs, nor with respect to any allocation of attorneys' fees, expenses, costs, or service awards to any other person or entity who may assert any claim thereto.

6. Lead Counsel is authorized to pay attorneys' fees, costs, and expenses and distribute service awards authorized and approved by this Order upon entry of this Order. The attorneys' fees, costs, expenses, and service awards authorized and approved by this Order shall constitute full and final satisfaction of any and all claims that DPPs and any Class Member, and their respective counsel, may have or assert for reimbursement of fees, costs, expenses, and service awards, and DPPs and Class members shall not seek or demand payment of any fees, costs, expenses, and/or service awards from AstraZeneca or Handa other than from the Settlement Fund.

SO ORDERED:

Date: _____, 2025

The Honorable Colm F. Connolly
Chief Judge, United States
District Court