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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: LIPITOR ANTITRUST  
LITIGATION

MDL No. 2332

This document relates to:

Master Docket No. 3:12-cv-2389  
(PGS/JBD)

Direct Purchaser Class Actions

**DIRECT PURCHASER CLASS PLAINTIFFS' UNOPPOSED  
MOTION FOR CERTIFICATION OF A SETTLEMENT CLASS,  
APPOINTMENT OF LEAD CLASS COUNSEL, PRELIMINARY  
APPROVAL OF PROPOSED SETTLEMENT, APPROVAL OF THE  
FORM AND MANNER OF NOTICE TO THE CLASS AND  
PROPOSED SCHEDULE FOR A FAIRNESS HEARING**

Direct Purchaser Class Plaintiffs hereby move, unopposed, for certification for purposes of settlement of a class of direct purchasers, appointment of Lead Class Counsel, preliminary approval of their proposed Settlement Agreement with Pfizer Inc., Pfizer Manufacturing Ireland, Warner-Lambert Co., and Warner-

Lambert Co. LLC (collectively or individually, “Pfizer”), approval of the form and manner of notice to the settlement class, preliminary approval of the proposed Plan of Allocation, appointment of the Notice and Claims Administrator, appointment of the Escrow Agent, and a proposed schedule for a Fairness Hearing.

Direct Purchaser Class Plaintiffs also submit a Proposed Order herewith.

Dated: February 14, 2024

Respectfully submitted,

/s/ Peter S. Pearlman

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