

## EXHIBIT 3

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 WILLIAM W. WICKERSHAM OF RG/2 CLAIMS  
ADMINISTRATION LLC 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**

1. I am the Vice President of Business Development and Client Relations at RG/2 Claims Administration LLC ("RG/2 Claims"). In that role, I oversee the intake and management of the claim administrations of all ongoing class action settlements handled by RG/2 Claims, including the creation and implementation of legal notice plans. I have been involved in the development and implementation of plans for class action notification for more than ten years.

2. RG/2 Claims was established in 2002 as a full service class action notice and claims administrator, providing notice and administration services for a broad range of collective actions, including but not limited to antitrust, securities, consumer, and employment cases. RG/2 Claims specializes in the creation, development and implementation of legal notification plans. Accordingly, RG/2 Claims is familiar with, and guided by Constitutional due process provisions, rules of states and local jurisdictions, and the relevant case law relating to legal notification. Since 2002, RG/2 Claims has administered and distributed in excess of \$2.0 billion in class-action settlement proceeds.

3. RG/2 Claims has previously acted as notice administrator in this matter and as noted in the June 28, 2024 *Declaration of Tina Chiango, RG/2 Claims Administration LLC, Regarding Notice to the Direct Purchaser Class* at paragraph 5, successfully mailed notice to all Class members. D.I. 661. RG/2 Claims has also provided settlement (and notice) administration services in several other direct purchaser pharmaceutical antitrust cases, on behalf of classes that include many of the same entities included in the certified settlement class (the “Direct Purchaser Class” or “Class”) in this case, including:

- *In re Lidoderm Antitrust Litig.*, No. 14-md-02521 (N.D. Cal.)
- *In re Loestrin 24 Fe Antitrust Litig.*, No. 1:13-md-2472 (D. R.I.)
- *In re Restasis (Cyclosporine Ophthalmic Emulsion) Antitrust Litig.*, No. 18-md-2819 (E.D.N.Y.)
- *In re Opana ER Antitrust Litig.*, MDL No. 2580 (N.D. Ill.)
- *In re Suboxone (Buprenorphine Hydrochloride and Naloxone) Antitrust Litig.*, MDL No. 2445 (E.D. Pa.)
- *In re Niaspan Antitrust Litig.*, MDL No. 2460 (E.D. Pa.)
- *In Re: Novartis and Par Antitrust Litig.*, Case No. 1:18-cv—4361 (AKH) (S.D.N.Y.)
- *In re Effexor XR Antitrust Litigation*, No. 3:11-cv-5479 (D.N.J.)
- *In Re: Zetia (Ezetimibe) Antitrust Litig.*, MDL No. 2:18-md-2836 (E.D.V.A.)

4. I submit this declaration at the request of Class Counsel for the Direct Purchaser Plaintiffs in order to provide more information about RG/2 Claims and to describe the proposed notice plan and notice services in the above-captioned litigation.

5. I have personal knowledge of the matters set forth in this declaration and, if called as a witness, could and would testify competently thereto.

6. The objective of the suggested Notice program is to provide the best notice practicable—Rule 23-compliant notice—to members of the Class.

7. The notice program includes the following elements:

a. Direct notice via United States Postal Service Mail (“USPS Mail”) to the Class members identified from Defendants’ records who purchased 50mg, 150mg, 200mg, and/or 300mg strength of brand or generic Seroquel XR directly from any of the Defendants at any time from August 2, 2015 until April 30, 2017. RG/2 will use the mailing list used for the previous successfully-delivered notice, which list was derived from defendants’ previously produced data, publicly available information, and address information from past cases to identify appropriate Class member addresses.

b. In addition to mailing of the notice, RG/2 will also maintain a toll-free number to answer and address any class member inquiries.

8. The proposed notice plan provides the best practicable method to reach the potential Class members and is consistent with other class action notice plans that have been approved by various federal courts for similarly situated matters including those referenced in paragraph 4 of this declaration.

9. Whenever practicable, direct USPS mail is the preferred form of notice for class members in a class action. *Eisen v. Carlisle & Jacquelin*, 417 U.S. 156, 175-76 (1974).

10. For the USPS mailing addresses, RG/2 Claims will run the contact information obtained through the USPS National Change of Address system (“NCOA”). The NCOA system provides updated addresses for all mail recipients who have filed a change of address with the post office within the past four years and helps to ensure that we have the most current addresses on file with the USPS. By this means, we will maximize the effectiveness of the direct mail and minimize returned undeliverable mail. And, in fact, RG/2 Claims already has contact information for all Class members based on their having been served notice in this case and often reaches out to Class members as part of the claim administration process, as needed.

11. After the NCOA update, RG/2 Claims will mail the Notice via USPS mail to all Class members, using all database records associated with a mailing address.

12. Any undeliverable mail that is returned to RG/2 Claims will be sorted and scanned. For Class members whose notices are returned without a forwarding address, RG/2 Claims will use various commercially available sources to retrieve the most accurate and updated information for the Class member. The database will be updated with any new address(es) found and the Notice will be re-mailed to the updated addresses.

13. RG/2 Claims believes this notice program is suitable for this case and is comparable to plans other federal courts have approved for similar cases. RG/2 Claims also believes that the Notice is drafted in the “plain language” format preferred by federal courts and provides the information required by Rule 23. RG/2 Claims believes that the Notice is understandable for Direct Purchaser Class members and complies with due process.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES THAT TO THE BEST OF MY KNOWLEDGE THE FOREGOING IS TRUE AND CORRECT.

Executed on May 28, 2025 in New York, NY.



---

William W. Wickersham, Declarant