EXHIBIT 6

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

In re: Seroquel XR (Extended Release Quetiapine Fumarate) Antitrust Litigation	Master Dkt. No. 20-1076-CFC
This Document Relates To: All Actions	

DIRECT PURCHASER PLAINTIFFS' PLAN OF ALLOCATION FOR THE DIRECT PURCHASER CLASS

J M Smith Corporation d/b/a, Smith Drug Company and KPH Healthcare Services, Inc. a/k/a Kinney Drugs, Inc. (together, the "Direct Purchaser Plaintiffs" or "Class Representatives"), on behalf of the Direct Purchaser Class,[1] hereby

[1] The Court previously certified the following "Class" or "Direct Purchaser Class:"

> All persons or entities in the United States, including its territories, possessions, and the Commonwealth of Puerto Rico, 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 (the "Class Period").
>
> Excluded from the Class are Defendants and their officers, directors, management and employees, predecessors, subsidiaries and affiliates, and all federal governmental entities.

D.I. 582 at ¶ 1. "Defendants" are AstraZeneca Pharmaceuticals LP, AstraZeneca UK Limited (collectively, "AstraZeneca"), Handa Pharmaceuticals, LLC ("Handa"), and Par Pharmaceutical, Inc. ("Par").

Also excluded from the Class for purposes of these Settlement Agreements are the following entities that previously opted out of the Class: Walgreen Co., The Kroger Co., Albertsons Companies, Inc., H-E-B, L.P., Hy-Vee, Inc., CVS

submit this proposed Plan of Allocation to allocate the settlement funds received in settlements with (a) AstraZeneca, and (b) Handa, plus any interest earned on the settlement funds, and net of Court-approved attorneys' fees, any Court-approved Class Representative service awards, and Court-approved expenses, including settlement-related costs and expenses (the "Net Settlement Fund").

The proposed Plan of Allocation ("Allocation Plan") allocates the Net Settlement Fund based on each Class member's *pro rata* share of weighted combined net purchases of brand and generic Seroquel XR 50mg, 150mg, 200mg, and/or 300mg tablets purchased directly from AstraZeneca or Par.[2] This proposal is similar to allocation plans that have been approved in settlements of similar class actions brought by direct purchasers to recover overcharges arising from allegedly impaired generic competition.[3]

Pharmacy, Inc., Rite Aid Corp., and Rite Aid Hdqtrs. Corp (the "Retailer Plaintiffs").

Par filed for bankruptcy and claims against it have subsequently been discharged. *See In re: Seroquel XR (Extended Release Quetiapine Fumarate) Antitrust Litig.*, Master Dkt. No. 20-1076-CFC, at D.I. 187, 662.

[2] *See* Declaration of Dr. Russell L. Lamb Related to Proposed Allocation Plan, dated May 29, 2025 ("Lamb Allocation Decl."), at ¶ 5 (filed herewith).

[3] *See*, *e.g.*, *In re Namenda Direct Purchaser Antitrust Litig.*, 1:15-cv-7488, D.I. 919-2, 947 (S.D.N.Y.) (*pro rata* shares of settlement fund computed on basis of claimants' brand and generic purchases based on allocation plan proposed by Dr. Lamb); *In re Lipitor Antitrust Litig.*, 3:12-cv-2389, D.I. 1363-3, 1424 (D.N.J.) (*pro rata* shares of settlement fund computed on basis of claimants' brand and generic purchases); *In re Effexor XR Antitrust Litig.,* 3:11-cv-5479, D.I. 729-3, 746

Plaintiffs' expert, economist Dr. Russell L. Lamb, can calculate each Class member's (and eventually, each Claimant's[4]) percentage share of the Net

(D.N.J.) (same); *In re Novartis and Par Antitrust Litig.*, 1:18-cv-4361, D.I. 587-2, 635 (S.D.N.Y.) (same); *In re Intuniv Antitrust Litig.*, 1:16-cv-12653, D.I. 480-7, 551 (D. Mass.) (same); *In re Loestrin 24 FE Antitrust Litig.*, 1:13-md-02472, D.I. 1411-8, 1462 (D.R.I.) (same); *In re Solodyn (Minocycline Hydrochloride) Antitrust Litig.*, 1:14-md-02503-DJC, D.I. 1163-4, 1179 (D. Mass.) (same); *In re Lidoderm Antitrust Litig.*, 3:14-md-02521-WHO, D.I. 1004-5, 1054 (N.D. Cal.) (same); *In re Aggrenox Antitrust Litig.*, No. 14-md-02516, D.I. 733-8, 739 (D. Conn.) (*pro rata* shares of settlement fund computed on basis of claimants' brand purchases); *King Drug of Florence, Inc. v. Cephalon, Inc.*, No. 2:06-cv-01797, D.I. 864-17, 870 (E.D. Pa.) (same); *In re Doryx Antitrust Litig. (Mylan Pharms., Inc. v. Warner Chilcott Public Ltd.)*, No. 2:12-cv-03824, D.I. 452-3, 665 (E.D. Pa.) (same); *In re Tricor Direct Purchaser Antitrust Litig.*, No. 1:05-00340, D.I. 536-1, 543 (D. Del.) (same). *See also In re Suboxone (Buprenorphine Hydrochloride and Naloxone) Antitrust Litig.,* 2:13-md-2445, D.I. 982-4, 1000 (E.D. Pa.) (*pro rata* shares of settlement fund on basis of claimants' brand Suboxone tablet and brand Suboxone film purchases in product hop case).

[4] A "Claimant" is any entity that timely submits a completed claim form. A Claimant's percentage share will be zero if that Claimant timely submits a claim form but that Claimant's claim is rejected because, for example, the Claimant did not directly purchase brand or generic Seroquel XR during the Class Period and does not have any valid assignment covering any such direct purchases. Allocations to Claimants whose right to settlement allocation arises by virtue of assignment from Class members would be determined in the same way as allocation for Class members. In such cases, the volumes of brand and generic Seroquel XR purchases used to determine the allocation would be the volumes assigned to the Claimant by an otherwise eligible Class member (and the assignor Class member's brand and generic Seroquel XR purchase volumes would be reduced by the same amount). Lamb Allocation Decl. at ¶ 5 n.14. As the claim form will make clear, data submitted by a Claimant who files a claim form based on an assignment may be shared with the Claimant's assignor Class member during the claims administration process. In addition, if the assignor Class member and Claimant filing by assignment from that assignor Class member cannot reach agreement about the Claimant's right to recover, including agreement regarding the purchase volumes covered by such assignment, then the disputed share of the Net

Settlement Fund using sales data for brand and generic Seroquel XR produced by AstraZeneca and Par in this litigation.[5] Claimants will also have the option of submitting their own records or data showing their net unit purchases of brand or generic Seroquel XR 50mg, 150mg, 200mg, and/or 300mg tablets during the relevant periods described below in, *inter alia*, Section 2.1, and will be required to submit data and documentation regarding any relevant assignment agreement. Dr. Lamb and his staff at Monument Economics Group, LLC ("Monument") will review any such submissions and confer with the Claims Administrator and Lead Class Counsel regarding the final calculations, which may include making any necessary and appropriate adjustments. *See* Lamb Allocation Decl. at ¶ 8.

Throughout this Allocation Plan, "purchases" refers to purchases of 50mg, 150mg, 200mg, and/or 300mg brand or generic Seroquel XR, net of returns or assignments, made directly from AstraZeneca or Par during the relevant time periods or purchases that are covered by a Claimant's assignment from a Class

---

Settlement Fund shall be placed into escrow and the assignee Claimant and the assignor Class member shall make application to the Court for any such monies held in escrow.

[5] *See* Lamb Allocation Decl. at ¶ 7. Dr. Lamb previously submitted three reports in this matter, which addressed, among other issues, damages and class certification. *See* Expert Report of Dr. Russell L. Lamb, dated September 20, 2023 ("Report" or "Lamb Report"); Supplemental Expert Report of Dr. Russell L. Lamb, dated October 6, 2023 ("Supplemental Report" or "Lamb Supplemental"); Expert Reply Report of Dr. Russell L. Lamb, dated February 1, 2024 ("Reply" or "Lamb Reply").

member covering purchases made directly from AstraZeneca or Par during the relevant time periods.[6] *Id.* at ¶ 5 n.11. The unit of purchase is a tablet of brand or generic Seroquel XR. *Id*.

As explained more fully below, Claimants' *pro rata* shares will be based only on purchases of Seroquel XR and/or generic Seroquel XR 50mg, 150mg, 200mg, and/or 300mg made directly from AstraZeneca or Par (or any such purchases covered by an assignment from a Class member) during the relevant time periods. *Id*. at ¶ 5.

The proposed Allocation Plan is practical and administratively efficient, using computerized sales data already obtained from AstraZeneca and Par during discovery, allowing for a timely distribution to the Class. *Id.* at ¶ 9. It also is a reasonable way to allocate the Net Settlement Fund and is fair to all members of the Class. *Id.* Because it utilizes data already produced in this litigation and already used by Dr. Lamb to calculate aggregate damages, it will be administratively efficient.

THE ALLOCATION PLAN

The Allocation Plan works as follows:

[6] To be clear, "purchases" do not include brand or generic Seroquel XR purchased, directly or indirectly, from any entity other than AstraZeneca or Par and do not include purchases of brand or generic Seroquel XR 400mg tablets, which is a strength for which damages were not measured in Dr. Lamb's reports. *Id.* at ¶ 5, n.11.

1.1 At the appropriate time and after receiving Court approval, the Claims Administrator, working with Dr. Lamb's firm Monument, will provide a separate, individualized claim form (the "Claim Form") for each Class member. The Claim Form will expressly set forth the Class member's purchases of brand and generic Seroquel XR 50mg, 150mg, 200mg, and/or 300mg from AstraZeneca or Par during the relevant period for such purchases, specifically: (a) net brand Seroquel XR 50mg, 150mg, 200mg, and/or 300mg direct purchases from AstraZeneca from August 2, 2015 through December 31, 2018;[7] and (b) net generic Seroquel XR 50mg, 150mg, 200mg, and/or 300mg direct purchases from Par for the period from November 1, 2016 through April 30, 2017.[8] Dr. Lamb can calculate these figures using the sales data produced during discovery by AstraZeneca and Par.[9] The Claim Form will request that the Class member verify the accuracy of the information contained in the Claim Form and will provide

[7] August 2, 2015 is the beginning of the Class Period and the beginning of the overcharge period Dr. Lamb analyzed in his prior reports. December 31, 2018 is the end of the period for which Dr. Lamb measured overcharges on brand Seroquel XR in his prior reports. *Id.* at ¶ 5, n.12.

[8] November 1, 2016 is the first date on which generic Seroquel XR was sold according to the sales data produced in this litigation, and April 30, 2017 is the end of the period for which Dr. Lamb measured overcharges on generic Seroquel XR in his prior reports. *Id.* at ¶ 5, n.13.

[9] *Id*. at ¶ 7 (explaining that these totals can be calculated from the sales data produced in this case, and that he has already performed preliminary calculations of each Class member's net purchases).

instructions for challenging any of the figures or computations contained in the Claim Form. If a Class member agrees that the information in the Claim Form is accurate, it will be asked to sign and return the Claim Form to the Claims Administrator.[10] If a Class member believes that the information contained in its Claim Form is not accurate, that Class member may submit its own purchase data pursuant to the procedures described below.

1.2 The Claim Form will request the Claimant's full name and mailing address for correspondence regarding the distribution of the Net Settlement Fund and the identity and contact information for the person responsible for overseeing the claims process for the Claimant. In addition, the Claim Form will include the release language contained in the Settlement Agreements with AstraZeneca and Handa. Each Claimant will be required to execute the Claim Form in exchange for receiving any distribution from the Net Settlement Fund.

1.3 *Timeliness*. The submission of the Claim Form to the Claims Administrator (with any necessary supporting documentation if the Claimant

[10] In order to help the Claimant verify that the purchase totals contained in the Claim Form are accurate, the brand and generic Seroquel XR 50mg, 150mg, 200mg, and/or 300mg National Drug Codes ("NDCs") will be listed on the Claim Form. The NDCs are standard codes maintained by the FDA and used in the pharmaceutical industry to identify specific pharmaceutical products and allow Claimants to understand precisely what purchases are being considered for purposes of allocation.

disagrees with the information contained in its Claim Form) will be deemed timely if it is received or postmarked within 45 days of the date Claim Forms are mailed.

2. Calculation of Weighted *Pro Rata* Shares of the Net Settlement Fund.

2.1 Each Claimant's allocated share of the Net Settlement Fund will be set in proportion to each Claimant's weighted combined total purchase volumes of (a) net brand Seroquel XR 50mg, 150mg, 200mg, and/or 300mg direct purchases from AstraZeneca from August 2, 2015 through December 31, 2018; and (b) net generic Seroquel XR 50mg, 150mg, 200mg, and/or 300mg direct purchases from Par for the period from November 1, 2016 through April 30, 2017; net of any assignments.[11] The Net Settlement Fund is then allocated to each Claimant based upon its percentage share of the total purchase volumes across all Claimants who submit valid, accepted Claim Forms.[12]

2.2 The allocation computation will be based on the following information (whether from the data already produced in discovery or from submissions by Claimants): (a) each Claimant's net brand Seroquel XR 50mg, 150mg, 200mg, and/or 300mg direct purchases from AstraZeneca from August 2, 2015 through December 31, 2018; and (b) each Claimant's net generic Seroquel

[11] Lamb Allocation Decl. ¶ 5. The dates utilized in this Plan of Allocation are explained above in Section 1.1 and footnotes 7-8.

[12] Lamb Allocation Declaration at ¶ 5(c).

XR 50mg, 150mg, 200mg, and/or 300mg direct purchases from Par for the period from November 1, 2016 through April 30, 2017.[13]

2.3 According to Dr. Lamb's prior damages calculations, 88.4 percent of the Class's damages are attributable to brand purchases (the Brand-Generic, or "B-G Damages"), while 11.6 percent of the aggregate Class damages were incurred on the Class's purchases of generic Seroquel XR (the Generic-Generic, or "G-G Damages").[14] The different percentages reflect the fact that damages on brand purchases were calculated as the difference between the high brand price and the much lower generic price; while damages on generic purchases were calculated as the difference between the (already low) generic price and the even lower generic price that would have prevailed with earlier generic

[13] *Id.* at ¶ 5. Claimants that have filed based on an assignment from a Class member must submit documentation of the assignment and data showing the purchases covered by any such assignment with their Claim. In addition, Class members that have assigned part or all of their claim by entering assignment agreements with the Retailer Plaintiffs shall have their purchase totals reduced by the volumes covered by such assignments. The pre-populated claim forms for Class members that have assigned all or part of their claim to the Retailer Plaintiffs will exclude those purchases that were assigned to the Retailer Plaintiffs. *Id.* at ¶ 5(c), n.14. For purposes of allocation, a purchase of brand Seroquel XR will be weighted the same regardless of strength and a purchase of generic Seroquel will be weighted the same regardless of strength because there was no material difference regarding damages between and among damages on the 50mg, 150mg, 200mg, and/or 300mg strengths according to Dr. Lamb's damages calculations. *Id.* at ¶ 5, n.11.

[14] *Id.* at ¶ 3.

competition.[15]

2.4 To calculate the *pro rata* share for each Claimant of the Net Settlement Fund, the Claims Administrator, working with Dr. Lamb, will:

a) allocate 11.6 percent of the Net Settlement Fund to the Class's generic Seroquel XR purchases by dividing up this 11.6 percent *pro rata* based on each Claimant's unit purchases of generic Seroquel XR from Par from November 1, 2016 through April 30, 2017. For example, if Claimant "X" purchased 100 units of generic Seroquel XR and there were 1,000 total generic Seroquel XR units purchased by all Claimants who submitted valid Claim Forms, then, based on its generic Seroquel XR purchases, Claimant X would receive an allocation of 10 percent (100/1,000) of the 11.6 percent of the Net Settlement Fund allocated to generic Seroquel XR purchases, or 1.16 percent (0.1 x 11.6) of the Net Settlement Fund.[16]

b) allocate 88.4 percent of the Net Settlement Fund to the Class's brand Seroquel XR purchases by dividing up this 88.4 percent *pro rata* based on each Claimant's unit purchases of brand

[15] *Id.*

[16] *Id.* at ¶ 5(a).

Seroquel XR from AstraZeneca from August 2, 2015 through December 31, 2018. For example, if Claimant "Z" purchased 200 units of brand Seroquel XR and there were 1,000 total brand Seroquel XR units purchased by all Claimants who submitted valid Claim Forms, then, based on its brand Seroquel XR purchases, Claimant Z would receive an allocation of 20 percent (200/1,000) of the 88.4 percent of the Net Settlement Fund allocated to brand Seroquel XR purchases, or 17.68 percent (0.2 x 88.4) of the Net Settlement Fund.[17]

c) calculate each Claimant's total *pro rata* share as the sum of its share allocated on the basis of its brand Seroquel XR purchases (if any) and the sum of its share allocated on the basis of its generic Seroquel XR purchases (if any), as described in the preceding two subsections, removing any purchases for which the rights to damages in this litigation have been assigned by agreement, using data provided by the Claimant or its corresponding assignee.[18]

2.5 The final calculations of each Claimant's *pro rata* share will

[17] *Id*. at ¶ 5(b).

[18] *Id*. at ¶ 5(c).

then be applied to the Net Settlement Fund to determine each Claimant's allocated share (in dollars). Should any Class member fail to submit a claim or should any Claimant document and submit an alternative amount of purchases that is approved by the Claims Administrator (in consultation with Dr. Lamb and Lead Class Counsel), the Claimant's shares will be recalculated accordingly.[19]

3. Processing of Claims.

3.1 All Claims will be reviewed and processed by the Claims Administrator, with assistance from Dr. Lamb and his staff at Monument as required and appropriate.

3.2 *Acceptance and Rejection*. The Claims Administrator shall first determine whether a Claim Form received is timely, properly completed, and signed. If a Claim Form is incomplete, the Claims Administrator shall communicate with the Claimant via first class mail, email, or telephone regarding the deficiency. The Claims Administrator may also contact Claimants requesting additional documentation or other materials. Claimants will have 14 days from the date they are contacted by the Claims Administrator regarding any question, requests for additional information, deficiency, or any other issue to provide a complete response, the requested documentation or other materials, and/or to cure any such deficiency. If a Claimant fails to adequately respond and/or correct any

[19] *See id*. at ¶ 8.

deficiency within 14 days, its claim may be rejected and the Claimant shall be notified by letter stating the reason for rejection. The Claims Administrator will then review all completed, non-deficient Claim Forms to determine whether each will be accepted or rejected and will notify any Claimants whose Claim Forms are rejected by letter stating that the Claimant's Claim Form is rejected and stating the reason for rejection. Any Claimant whose Claim Form is rejected may seek review by the Court via the appeals process described in Section 7.2 below.

3.3 All late Claim Forms that are otherwise complete will be processed by the Claims Administrator but marked as "Late Approved Claims." If Lead Class Counsel conclude that, in their judgment, any such "Late Approved Claims" should ultimately not be accepted,[20] the Claimant will be so notified, and then may seek review by the Court via the appeals process described in Section 7.2 below.

3.4 *The Pro Rata Distribution Calculation*. Dr. Lamb and his staff

[20] *Cf. In re Cendant Corp. Prides Litig.*, 233 F.3d 188, 189 (3d Cir. 2000) (affirming district court order permitting distribution of settlement funds to late-submitted claim forms). Courts have approved similar provisions in similar generic suppression cases. *See, e.g.*, *In re Lipitor Antitrust Litig.*, 3:12-cv-2389, D.I. 1363-3 at § 3.3, 1424 (D.N.J.) (approving a similar provision regarding late claims); *In re Effexor XR Antitrust Litig.,* 3:11-cv-5479, D.I. 729-3 at § 3.3, 746 (D.N.J.) (same); *In re Suboxone (Buprenorphine Hydrochloride and Naloxone) Antitrust Litig.,* 2:13-md-2445, D.I. 982-4 at § 3.3, 1000 (E.D. Pa.) (same); *In re Tricor Direct Purchaser Antitrust Litig.*, No. 1:05-00340, D.I. 536-1 at § 4.3, 543 (D. Del.) (same).

at Monument, in conjunction with the Claims Administrator and Lead Class Counsel, will be responsible for determining the total amount each Claimant will receive from the Net Settlement Fund. Once the Claims Administrator has determined which claims are approved, Monument will work with the Claims Administrator to calculate each Claimant's *pro rata* share of the Net Settlement Fund as determined by the calculation described above in Section 2.[21]

4. Processing Challenged Claims.

4.1 The Claims Administrator, in conjunction with Dr. Lamb and his staff at Monument and Lead Class Counsel, shall review any and all written challenges by Claimants to the determinations of the Claims Administrator. If upon review of a challenge and supporting documentation, the Claims Administrator and Dr. Lamb decide to amend or modify their determination, the Claims Administrator shall advise the Claimant who made the challenge. These determinations shall be final, subject to the appeals process described in Section 7.2 below.

4.2 Where the Claims Administrator, in conjunction with Dr. Lamb and his staff at Monument and Lead Class Counsel, determines that a challenge requires additional information or documentation, the Claims Administrator will so advise the Claimant and provide that Claimant an opportunity to cure the

[21] *See* Lamb Allocation Decl. ¶ 8.

deficiency within 14 days, as set forth in Section 3.2 above. If that Claimant fails to cure the deficiency within that time, the challenge may be rejected and the Claimant will be notified of the rejection of its challenge by mail, which notification shall be deemed final subject to any appeal and decision by the Court.

4.3 If the Claims Administrator, in conjunction with Dr. Lamb and his staff at Monument and Lead Class Counsel, concludes that it has enough information to properly evaluate a challenge and maintains that its initial determinations were correct, it will so inform the Claimant in writing. Such notification shall be deemed final subject to any appeal and decision by the Court.

5. Report to Court Regarding Distribution of Net Settlement Fund.

5.1 After the Claims Administrator reviews all submitted claims and works with Dr. Lamb to determine the amount each Claimant is entitled to receive from the Net Settlement Fund, the Claims Administrator will prepare a final report for the Court's review and approval. The report will explain the tasks and methodologies employed by the Claims Administrator in processing the claims and administering the Allocation Plan. It will also contain (a) a list of Class members or other Claimants (if any) who filed Claim Forms that were rejected and the reasons, (b) a list of challenges (if any) to the estimated distribution amounts that were rejected and the reasons, and (c) the date any such Claimant whose challenge was rejected was informed by the Claims Administrator for purposes of

calculating the timeliness of any appeal using the procedures set forth below. Finally, the final report shall contain an accounting of the expenses associated with the Allocation Plan, including bills from Monument and the Claims Administrator, any taxes that are due and owing, and any other fees or expenses associated with the settlement allocation process.

6. Payment to the Claimants.

6.1 Upon Court approval of the final report and declaration of the Claims Administrator, the Claims Administrator shall issue, with Court approval, a check or wire payable to each Claimant who has submitted a complete and valid Claim Form, including to each Claimant that filed a Late Approved Claim.

6.2 Subject to further order of the Court, any monies from the Net Settlement Fund that remain unclaimed after any initial distribution or additional monies received at a later date pursuant to the Settlements with AstraZeneca and Handa shall, if economically feasible, be distributed (with Court approval) to Claimants in an additional distribution or distributions on the basis of the same calculations of the Claimants' *pro rata* weighted combined total of brand and generic Seroquel XR 50mg, 150mg, 200mg, and/or 300mg purchases described above.

6.3 Insofar as the Net Settlement Fund includes residual funds after distribution or distributions as set forth in the preceding sections that cannot be

economically distributed to the Claimants (because of the costs of distribution as compared to the amount remaining), Lead Class Counsel shall make an application to the Court for such sums to be used to make *cy pres* payments for the benefit of members of the Class.[22]

7. Resolution of Disputes.

7.1 In the event of any disputes between Claimants and the Claims Administrator on any subject (*e.g.*, timeliness, required completeness or documentation of a claim, or the calculation of the Claimant's unit purchases of brand or generic Seroquel XR, share of the net settlement fund, and/or amount payable), the decision of the Claims Administrator shall be final, subject to the Claimant's right to seek review by the Court. In notifying a Claimant of the final rejection of a Claim or a challenge thereto, the Claims Administrator shall notify the Claimant of its right to seek such review.

7.2 Any such appeal by a Claimant must be submitted in writing to the Court, with copies to the Claims Administrator and Lead Class Counsel, within 14 days of the Claims Administrator's final rejection notification to the Claimant.

[22] In the experience of Lead Class Counsel, based on prior distributions in similar cases, an application for a *cy pres* distribution is unlikely.

Dated: May 29, 2025

Respectfully submitted,

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, 28th Floor
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*)
Laurel Boman (*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
lboman@bm.net

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*)
Carlos I. Ruiz (*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
cruiz@hpcllp.com

Stuart E. Des Roches (*pro hac vice*)
Dan Chiorean (*pro hac vice*)
Thomas Maas (*pro hac vice*)
Caroline Hoffmann (*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
choffmann@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