

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

**If you purchased brand or generic Seroquel XR® (extended release quetiapine fumarate) 50mg, 150mg, 200mg, and/or 300mg strength tablets directly from AstraZeneca Pharmaceuticals L.P., AstraZeneca UK Limited, Handa Pharmaceuticals, LLC, and/or Par Pharmaceutical, Inc., your rights may be affected by the settlement of a class action lawsuit.**

*A federal court authorized this notice. It is not a solicitation from a lawyer.*

The purpose of this Notice is to alert you to the existence of and provide important details about proposed settlements relating to a class action lawsuit brought by J M Smith Corporation d/b/a, Smith Drug Company and KPH Healthcare Services, Inc. a/k/a Kinney Drugs, Inc. (collectively “Plaintiffs” or “Class Representatives”) on behalf of direct purchasers of brand or generic Seroquel XR directly from AstraZeneca Pharmaceuticals L.P., AstraZeneca UK Limited (collectively “AstraZeneca”), Handa Pharmaceuticals, LLC (“Handa”), and Par Pharmaceutical, Inc. (“Par”)<sup>1</sup> and to give you the opportunity to object to or opt out of proposed settlements of that lawsuit with AstraZeneca and Handa (the “Settlement Agreements”).

The proposed settlements with AstraZeneca and Handa will provide \$51,419,000 in cash to resolve the Direct Purchaser Class’s claims against AstraZeneca and Handa (the “Settlement Fund”).

**YOUR LEGAL RIGHTS ARE AFFECTED WHETHER YOU ACT OR DO NOT ACT,  
SO PLEASE READ THIS NOTICE CAREFULLY.**

The Court has scheduled a hearing to decide on final approval of the settlements with AstraZeneca and Handa, the plan for allocating the Settlement Fund to Direct Purchaser Class members (summarized in the responses to Questions 6 and 7 below), and Lead Class Counsel’s request for settlement administration costs, attorneys’ fees, reimbursement of Lead Class Counsel’s out-of-pocket expenses and costs, and service awards to the Class Representatives. That hearing is scheduled for September 12, 2025 at 9:00 am Eastern Time before U.S. District Court Chief Judge Colm F. Connolly in Courtroom 4B of the United States District Court for the District of Delaware, J. Caleb Boggs Federal Building, 844 N. King Street, Wilmington, Delaware 19801.

The Court previously determined that the lawsuit between Direct Purchaser Class Plaintiffs and AstraZeneca and Handa can proceed as a class action because it meets the requirements of the Federal Rule of Civil Procedure 23, which governs class actions in federal courts. The class (hereinafter, the “Direct Purchaser Class” or the “Class”) consists of the following:

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<sup>1</sup> Par filed for bankruptcy and claims against it have subsequently been discharged. *See In re: Seroquel XR (Extended Release Quetiapine Fumarate) Antitrust Litigation*, Master Dkt. No. 20-1076-CFC, at D.I. 187, 662.

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<sup>2</sup> 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.

Also excluded from the Class for purposes of the Settlement Agreements are the following entities: Walgreen Co., The Kroger Co., Albertsons Companies, Inc., H-E-B, L.P., Hy-Vee, Inc., CVS Pharmacy, Inc., Rite Aid Corp., and Rite Aid Hdqtrs. Corp (the “Retailer Plaintiffs”).

The proposed settlements will affect the rights of all members of the Class, as defined above.

The Court in charge of this case still has to decide whether to give Final Approval to the proposed settlements with AstraZeneca and Handa.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENTS	
<b>IF YOU WISH TO RECOVER A SHARE OF THE SETTLEMENT FUND, PROMPTLY COMPLETE AND RETURN THE ENCLOSED CLAIM FORM</b>	If you are a member of the Class, the enclosed Claim Form must be completed, signed and returned or postmarked by <b>July 24, 2025</b> to obtain a share of the Settlement Fund.
<b>OBJECT TO THE SETTLEMENTS</b>	<p>If you object to any part or all of the proposed settlements, you must file an objection with the Court, along with a statement explaining the basis for your objection to the proposed settlement(s). You must also send a copy of your objections to the Clerk of the Court and the lawyers listed in Question 12 below.</p> <p><u>Regardless of whether you object, the enclosed Claim Form must be completed, signed and returned or postmarked by mail by July 24, 2025 in order to recover a share of the Settlement Fund.</u></p>
<b>GET MORE INFORMATION</b>	If you would like to receive more information about the proposed settlements, you can send questions to the lawyers identified in this Notice and/or attend the hearing at which the Court will evaluate the proposed settlement.

***These rights and options—and the deadlines to exercise them—are explained in this Notice.***

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<sup>2</sup> “Defendants” are AstraZeneca, Handa, and Par.

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## WHY THIS NOTICE HAS BEEN ISSUED

### **1. Why Did I Get This Notice?**

You received this notice because, according to sales data produced by the Defendants, you may have purchased brand Seroquel XR 50mg, 150mg, 200mg, and/or 300mg strength tablets directly from AstraZeneca and/or generic Seroquel XR 50mg, 150mg, 200mg, and/or 300mg strength tablets directly from Par during the period from August 2, 2015 through April 30, 2017.

A federal court authorized this Notice because you have a right to know about the proposed settlements with AstraZeneca and Handa and about all of your options before the Court decides whether to grant final approval of the settlements. This Notice explains the lawsuit, the settlements, your legal rights, what benefits are available, and eligibility for those benefits. Note that you may have received this Notice in error; simply receiving this Notice does not mean you are definitely a member of the Direct Purchaser Class. You may confirm that you are a member of the Direct Purchaser Class by reviewing the criteria set forth in Question 5 below. You may also call or write to the lawyers in this case at the telephone number or address listed in Question 9 below.

### **2. What is This Lawsuit About?**

J M Smith Corporation d/b/a Smith Drug Company and KPH Healthcare Services, Inc. a/k/a Kinney Drugs, Inc (together, the “Plaintiffs” or “Class Representatives”) filed lawsuits individually and as representatives of 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”). Excluded from the Class are Defendants and their officers, directors, management and employees, predecessors, subsidiaries and affiliates, and all federal governmental entities. Also excluded are the Retailer Plaintiffs, as defined above. The lawsuit asserts that, as a result of the Defendants’ alleged unlawful conduct, the prices paid for brand Seroquel XR and generic Seroquel XR (extended release quetiapine fumarate) were higher than they otherwise would have been. The Plaintiffs seek to recover damages in the form of overcharges on direct purchases of brand and generic Seroquel XR 50mg, 150mg, 200mg, and/or 300mg strength tablets from the Defendants. Plaintiffs allege the overcharges were caused by Defendants’ conduct. Under federal antitrust law, any damages awarded at trial are automatically trebled (that is, tripled). Plaintiffs also seek to recover attorneys’ fees and costs.

The lawsuit alleges that the Defendants violated federal antitrust laws by unlawfully impairing and delaying the introduction of generic versions of the prescription drug Seroquel XR into the United States market. The Plaintiffs allege that in September 2011, the manufacturer of brand Seroquel XR, AstraZeneca, and a generic pharmaceutical company, Handa, entered into a “pay for delay” or “reverse payment” agreement in violation of federal antitrust laws. A “pay for delay” or “reverse payment” agreement, generally speaking, is an agreement in which a brand name drug company provides compensation to a generic competitor, and in return, the generic competitor agrees to stop challenging, or stop trying to invent around, the brand company’s patent and agrees to delay launching its generic product. Handa then assigned the agreement to Par, and Par

performed the agreement, launching generic Seroquel XR on the delayed entry date of November 2016. Absent the alleged unlawful conduct, the Plaintiffs claim, Handa and/or Par would have launched generic Seroquel XR earlier than November 2016. The Plaintiffs also claim that AstraZeneca would have launched its own competing generic version of Seroquel XR, an “authorized generic,” at or about the same time. The Plaintiffs allege that the prices for Seroquel XR and generic Seroquel XR were higher than they would have been absent the Defendants’ alleged unlawful conduct.

The Defendants deny all these allegations, including that the Plaintiffs or Class members are entitled to damages or other relief.

There has been no determination by the Court or a jury that the allegations against Defendants have been proven or that, if proven, Defendants’ conduct caused harm to the Class. This Notice is not an expression of any opinion by the Court as to the claims against AstraZeneca or Handa or the defenses asserted by AstraZeneca or Handa.

Chief Judge Colm F. Connolly of the United States District Court for the District of Delaware is overseeing this class action and the settlements. The lawsuit is known as *In re: Seroquel XR (Extended Release Quetiapine Fumarate) Antitrust Litig.*, Master Dkt. No. 20-1076 (D. Del.).

### **3. Why is This Lawsuit a Class Action?**

In a class action lawsuit, one or more persons or entities sue on behalf of others who have similar claims. Together, all these entities make up the “Class” and are called “Class members.” The companies that filed suit are called the “Plaintiffs” (or “Class Representatives”). The companies that are sued are called the “Defendants.”

In a class action lawsuit such as this one, one court resolves the issues for everyone in the class, except for those Class Members who previously timely excluded themselves (*i.e.*, “opted out”) from the class. The District Court, by memorandum and order filed on February 6, 2024, earlier determined that the lawsuit by Direct Purchaser Class Plaintiffs against the Defendants AstraZeneca and Handa would proceed as a class action.

A copy of the District Court’s class certification memorandum may be found at [www.garwingerstein.com](http://www.garwingerstein.com).

Specifically, the Court previously found that:

- The number of Class Members is so numerous that joining them all into one suit would be impractical.
- Class Members share common legal or factual issues relating to the claims in this case.
- The claims of the Class Representatives are typical of the claims of the rest of the Class Members.
- The Class Representatives and the lawyers representing the Class will fairly and adequately protect the Class’s interests.

- Class-wide issues predominate over any questions affecting only individual members of the Class, and this class action is a superior method to fairly and efficiently adjudicate this controversy.

The members of the Class are “Class members” or “Direct Purchaser Class members.”

#### **4. Why Are There Settlements?**

The Direct Purchaser Class Plaintiffs, AstraZeneca, and Handa were preparing to proceed to trial, but they have now agreed to the proposed settlements. By settling, the Direct Purchaser Class Plaintiffs and AstraZeneca and Handa all avoid the risk of trial and the continued costs of litigation. The Class Representatives and Lead Class Counsel believe that the proposed settlements are fair, adequate, reasonable, and in the best interests of the Class.

### **WHO IS INCLUDED IN THE CLASS AND THE SETTLEMENTS**

To see if you are in the Class, and if so, how you will be able to share in the Settlement Fund, you first have to decide if you are a Class member.

#### **5. Am I Part of the Class and the Settlements?**

You are in the Class if you are a person or entity in the United States and its territories that purchased brand Seroquel XR 50mg, 150mg, 200mg, and/or 300mg strength tablets directly from AstraZeneca and/or generic Seroquel XR (extended release quetiapine fumarate) 50mg, 150mg, 200mg, and/or 300mg strength tablets directly from Par at any time during the period August 2, 2015 through April 30, 2017. Excluded from the Class are Defendants and their officers, directors, management and employees, predecessors, subsidiaries and affiliates, and all federal governmental entities. Also excluded are the Retailer Plaintiffs, as defined above.

If you are not sure whether you are included, you may call or write to the lawyers in this case at the telephone number or address listed in Question 9 below.

### **THE SETTLEMENT BENEFITS: WHAT YOU GET**

#### **6. What Do the Settlements Provide?**

AstraZeneca and Handa have agreed to pay a combined \$51,419,000 in cash into an interest-bearing escrow account (“Settlement Fund”) for the benefit of the Class.

If approved by the Court, the Settlement Fund, minus any Court-awarded fees and expenses to Lead Class Counsel, the cost of settlement notice and administration, and service awards to the Class Representatives (the “Net Settlement Fund”), will be distributed to Class members who return valid and timely Claim Forms. The distribution will be made on a *pro rata* basis, consistent with each Class member’s aggregate share of the total Class purchases of brand and generic Seroquel XR from AstraZeneca and Par during the relevant time periods described below in response to Question 7. The Allocation Plan utilizes the combined totals of each Class member’s

purchases of brand and generic Seroquel XR from AstraZeneca and Par during the relevant time periods described below in response to Question 7.

Transactional sales data from AstraZeneca and Par will be used to make these calculations. Class members will be given the opportunity to provide data or information to supplement or correct this information if they choose. With this Notice, each Class member is being sent a Claim Form pre-populated with information about Class members' purchases to review, sign, and submit.

Lead Class Counsel will ask for service awards for each Class Representative of \$100,000 from the Settlement Fund in recognition of their efforts to date on behalf of the Class.

In exchange for the Settlement Fund, AstraZeneca and Handa will be released and discharged from all antitrust and similar claims relating to brand and generic Seroquel XR as defined in the Settlement Agreements. The full text of the releases are included in the Settlement Agreements, available at [www.garwingerstein.com](http://www.garwingerstein.com), and it is that text that governs the scope of the releases.

This Notice is a summary only and is not intended to, and does not, vary the terms of the actual Settlement Agreements.

#### **7. When Would I Get My Payment and How Much Would It Be?**

Each Class member's proportionate *pro rata* recovery will be determined using a Court-approved Plan of Allocation. The detailed Plan of Allocation is posted and can be reviewed at [www.garwingerstein.com](http://www.garwingerstein.com). Under the Plan of Allocation, your share of the Net Settlement Fund will depend on the weighted net total amount of brand Seroquel XR 50mg, 150mg, 200mg, and/or 300mg that you purchased from AstraZeneca from August 2, 2015 through December 31, 2018 and generic Seroquel XR 50mg, 150mg, 200mg, and/or 300mg that you purchased from Par from November 1, 2016 through April 30, 2017 ("Class Purchases"). Generally, those who purchased more will get a higher recovery.

Your share of the Net Settlement Fund will also depend on the number of valid Claim Forms that Class members submit. If fewer than 100% of the Class members send in a Claim Form, you could get a larger *pro rata* share.

Money from the settlements will only be distributed to Class members if the Court grants final approval of the settlements. Payment is conditioned on several matters, including the Court's approval of the settlements and such approval no longer being subject to any appeals to any court or, if there is an appeal, such appeal being final and no longer subject to any further appeal.

The Settlement Agreements may be terminated if the Court does not approve the settlements or materially modifies it. If the Settlement Agreements are terminated, the lawsuit will proceed against AstraZeneca and Handa as if such settlements had not been reached.

#### **8. How Can I Get a Payment?**

You must complete and return the enclosed Claim Form by mail by July 24, 2025 to request a *pro rata* share of the Net Settlement Fund (though money from the settlements will only be distributed to Class members if the Court grants final approval of the settlement). Court-approved fees and

expenses for the attorneys and service awards to the Class Representatives will also be paid by the Settlement Fund. Transactional sales data from AstraZeneca and Par will be used to make the *pro rata* share calculations. You will need to verify the accuracy of the information in the Claim Form, and to sign and return the Claim Form according to the directions on the Claim Form. Class members have the opportunity to provide data or information to supplement or correct this information.

Claim Forms must be postmarked (with any necessary supporting documentation if the Claimant disagrees with the information contained in its Claim Form) by July 24, 2025.

## **THE LAWYERS REPRESENTING THE CLASS**

### **9. Do I Have a Lawyer in this Case?**

The Court has appointed the law firm Garwin Gerstein & Fisher LLP lead class counsel to represent you and all Class members. Their contact information is as follows:

Jonathan M. Gerstein  
Garwin Gerstein & Fisher, LLP  
Wall Street Plaza  
88 Pine Street, Suite 2810  
New York, NY 10005  
T: (212) 398-0055  
F: (212) 764-6620  
[jgerstein@garwingerstein.com](mailto:jgerstein@garwingerstein.com)

### **10. Should I Get My Own Lawyer?**

You do not need to hire your own lawyer if you are in the Class because the lawyers appointed by the Court are working on your behalf. You may hire a lawyer and enter an appearance through your lawyer at your own expense if you so desire.

### **11. How Will the Lawyers Be Paid?**

If the Court gives Final Approval to the settlements with AstraZeneca and Handa, then the Court will be asked to approve reasonable fees and expenses for the lawyers who worked on the case and for reimbursement of the litigation expenses they have advanced on behalf of the Class. Lead Class Counsel intends to seek attorneys' fees of up to thirty-six percent (36%) of the Settlement Fund, including a proportionate share of accrued interest, plus reimbursement of reasonable litigation expenses they incurred litigating the case. If the Court grants Lead Class Counsel's request, attorneys' fees and litigation expenses would be deducted from the Settlement Fund. Class members will not have to pay any attorneys' fees or expenses out of their own pockets.

Any application by Lead Class Counsel for an award of attorneys' fees, reimbursement of expenses, and service awards to the Class Representatives will be filed with the Court and made available for download and/or viewing on or before July 10, 2025 at [www.garwingerstein.com](http://www.garwingerstein.com), as well as the offices of the Clerk of Court for the United States District Court for the District of



Delaware, J. Caleb Boggs Federal Building, 844 N. King Street, Wilmington, Delaware 19801, during normal business hours.

## OBJECTING TO THE SETTLEMENTS

### 12. How Do I Tell the Court That I Do Not Like the Settlement?

If you are a member of the Class, you can object to either or both of the settlements or any part of them if you do not like them, and/or the application for attorneys' fees, costs, and expenses, and/or service awards to the Class Representatives. The Court will consider your views. To object, you must file an objection with the Court on the docket for *In re: Seroquel XR (Extended Release Quetiapine Fumarate) Antitrust Litig.*, Master Dkt. No. 20-1076 (D. Del.), along with a statement explaining the basis of your objection along with any supporting documentation. In addition to filing the objection, you also must send a copy of your objection by mail to the addresses below. Be sure to include your name, address, telephone number, signature, and the reasons why you object to the settlement(s). You must mail the objection separately to each of the following:

Counsel for Defendants	Lead Class Counsel
<p>Counsel for AstraZeneca:</p> <p>Benjamin Greenblum Williams &amp; Connolly LLP 680 Maine Avenue SW Washington, DC 20024 bgreenblum@wc.com</p> <p>Counsel for Handa:</p> <p>James E. Gallagher Davis Malm &amp; D'Agostine, P.C. One Boston Place, 37th Floor Boston, MA 02108 cmarino@davismalm.com</p>	<p>Jonathan M. Gerstein Garwin Gerstein &amp; Fisher LLP 88 Pine Street, 28th Floor New York, NY 10005 Tel.: 212-398-0055 jgerstein@garwingerstein.com</p>
Clerk of the Court	
<p>Clerk of Court for the United States District Court for the District of Delaware, J. Caleb Boggs Federal Building, 844 N. King Street, Wilmington, Delaware 19801</p>	

**Your objection must be postmarked/filed with the Court no later than July 24, 2025. Again, whether or not you object to the proposed settlement(s), the enclosed Claim Form must be completed, signed and returned or postmarked by mail by July 24, 2025 to request a *pro rata* share of the Net Settlement Fund.**

## THE COURT'S FINAL FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the settlements. You may attend, and you may ask to speak, but you do not have to.

### **13. When and Where Will the Court Decide Whether to Approve the Settlement?**

The Court will hold a Final Fairness Hearing at 9:00 am Eastern Time on September 12, 2025 in Courtroom 4B of the United States District Court for the District of Delaware, 844 North King St, Wilmington, DE 19801. At this hearing, the Court will consider whether the settlements with AstraZeneca and Handa are fair, reasonable, and adequate. If there are objections, the Court will consider them. After the hearing, the Court will decide whether to approve the settlements. We do not know how long these decisions will take. The date and time of the hearing is subject to change. Notice of such change will be posted at [www.garwingerstein.com](http://www.garwingerstein.com).

### **14. Do I Have to Come to the Hearing?**

No, you do not have to attend the hearing. Lead Class Counsel will answer any questions that Chief Judge Connolly may have. You are welcome to attend at your own expense, however.

If you send an objection, you do not have to come to Court to talk about it. So long as you mail your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but this is not necessary for you to receive a *pro rata* share of the Net Settlement Fund.

### **15. May I Speak at the Hearing?**

If you are a member of the Class, you may ask the Court for permission to speak at the Final Fairness Hearing. To do so, you must send a letter via First Class U.S. Mail saying that it is your "Notice of Intention to Appear in *In re: Seroquel XR (Extended Release Quetiapine Fumarate) Antitrust Litig.*, Master Dkt. No. 20-1076 (D. Del.)." Be sure to include your name, address, and telephone number, your signature, and a summary statement outlining your positions and the reasons for them, as well as copies of any supporting documents or briefs you want the Court to consider. Your Notice of Intention to Appear must be postmarked no later than July 24, 2025, and must be sent to the Clerk of the Court, Lead Class Counsel and Counsel for Defendants, at the addresses set forth in the responses to Question 12.

You cannot speak at the hearing if you do not send a Notice of Intention to Appear.

## IF YOU DO NOTHING

### **16. What Happens If I Do Nothing At All?**

If you are a member of the Class and you do nothing, and the Court approves the settlements, then you will remain in the Class and will be eligible to participate in the settlements as described in this Notice. You will also release your claims against AstraZeneca and Handa as described in the Settlement Agreements. However, the Claim Form provided with this Notice must be completed, signed and returned or postmarked by mail by July 24, 2025 in order to obtain a payment.

## GETTING MORE INFORMATION

### **17. How Do I Get More Information?**

If you have questions about this case or wish to read more detailed information about this litigation, you may call or write to Lead Class Counsel as indicated in Question 9. Further information is also available at [www.garwingerstein.com](http://www.garwingerstein.com). The Claims Administrator, RG/2 Claims Administration LLC, can be contacted at the following address:

Seroquel XR Antitrust  
c/o RG2 Claims Administration LLC  
P.O. Box 59479  
Philadelphia, PA 19102-9479

This Notice is only a summary of the proposed settlements and is qualified in its entirety by the terms of the actual Settlement Agreements. A copy of the Settlement Agreements are on public file with the Office of the Clerk, United States District Court for the District of Delaware, 844 North King St, Wilmington, DE 19801, and are also available at [www.garwingerstein.com](http://www.garwingerstein.com).

**PLEASE DO NOT WRITE TO OR CALL THE COURT OR THE CLERK'S OFFICE FOR INFORMATION. INSTEAD, PLEASE DIRECT ANY INQUIRIES TO LEAD CLASS COUNSEL LISTED ABOVE OR TO RG/2 CLAIMS ADMINISTRATION LLC.**

DATE: JUNE 23, 2025

BY THE COURT  
Colm F. Connolly, Chief Judge  
United States District Court, D. Del.