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

IN RE ALLERGAN GENERIC DRUG  
PRICING SECURITIES LITIGATION

Case No. 2:16-cv-09449 (KSH)  
(CLW)

**NOTICE OF LEAD PLAINTIFFS' MOTION  
FOR APPROVAL OF DISTRIBUTION PLAN**

To: All Counsel by ECF

COUNSEL:

PLEASE TAKE NOTICE that on October 2, 2023, at a time to be determined by the Court in Courtroom 4D of the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, or by telephone or video conference in the discretion of the Court, before the Honorable Cathy L. Waldor, Lead Plaintiffs, Sjunde AP-Fonden and Union Asset Management Holding AG, by and through their undersigned counsel, will and hereby move the Court for an order granting Lead Plaintiffs' Motion for Approval of Distribution Plan, under Federal Rule of Civil Procedure 23(e), and this Court's Judgment Approving Class Action Settlement (ECF No. 238) and Order Approving Plan of Allocation of Net Settlement Fund (ECF No. 236), which will: (i) approve the administrative determinations of A.B. Data, Ltd.'s Class Action Administration Company ("A.B. Data") accepting and rejecting the Claims submitted in connection with the settlement of the above-captioned action ("Settlement"); (ii) direct distribution of the Net Settlement Fund to Claimants whose Claims are accepted by A.B. Data as valid and approved by the Court ("Authorized Claimants"), while maintaining a reserve for any tax liability or claims administration-related contingencies that may arise; (iii) direct that distribution checks state that the check must be cashed within 90 days after the issue date; (iv) direct that Authorized Claimants will forfeit all

recovery from the Settlement if they fail to cash their distribution checks in a timely manner; (v) approve the recommended plan for any funds remaining after the initial distribution; (vi) approve A.B. Data's fees and expenses incurred and estimated to be incurred in the administration of the Settlement; (vii) release claims related to the administration process; and (viii) authorize the destruction of Claims and supporting documents at an appropriate time.

PLEASE TAKE FURTHER NOTICE that, in support of the Motion, the undersigned intend to rely on the accompanying Memorandum of Law and the accompanying Declaration of Adam D. Walter in Support of Lead Plaintiffs' Motion for Approval of Distribution Plan ("Walter Declaration") and exhibits attached thereto, submitted on behalf of the Court-authorized Claims Administrator, A.B. Data, and the papers and pleadings filed in the action, the arguments of counsel, and any other matters properly before the Court. The [Proposed] Order Approving Distribution Plan ("Class Distribution Order") granting the relief requested herein is attached.

PLEASE TAKE FURTHER NOTICE that, there is one disputed Claim requiring Court review. Upon the filing of this Motion, Lead Counsel will send the Claimant with the Disputed Claim a copy of this Motion, the Memorandum of Law, the Walter Declaration, Exhibit D to the Walter Declaration, and the proposed Class Distribution Order. Lead Counsel will inform the Claimant that

they do not need to take any further action to have the Court consider their dispute; however, if the Claimant wishes to make an additional submission, they should direct it to the Court's attention with a copy to Lead Counsel postmarked no later than September 18, 2023. If any such submission is made, Lead Counsel will submit a response by September 25, 2023, addressing such submission.

Pursuant to the terms of the Stipulation and Agreement of Settlement (ECF No. 223-1, ¶ 18), Defendants have no interest in the relief sought by the Motion. Further, Defendants' Counsel were provided with the Motion and have informed Lead Counsel that they take no position on the Motion.

Dated: August 28, 2023

Respectfully submitted,

*s/ James E. Cecchi*

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**CERTIFICATION OF SERVICE**

I hereby certify that on August 28, 2023, I caused a true and correct copy of the foregoing Notice of Lead Plaintiffs' Motion for Approval of Distribution Plan to be electronically filed with the Clerk of the Court using the ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: August 28, 2023

*s/ James E. Cecchi* \_\_\_\_\_

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