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

IN RE: LIPITOR ANTITRUST
LITIGATION

This document relates to:

Direct Purchaser Class Actions

MDL No. 2332

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

**DIRECT PURCHASER CLASS PLAINTIFFS' MOTION
FOR DISTRIBUTION FROM THE SETTLEMENT FUND**

In accordance with this Court's June 12, 2024 Order Granting Final Judgment and Order of Dismissal Approving Direct Purchaser Class Settlement and Dismissing Direct Purchaser Class Claims Against Pfizer Inc., Pfizer Manufacturing Ireland, Warner-Lambert Co., and Warner-Lambert Co. LLC, ECF No. 1424 (the

“Final Approval Order”), Direct Purchaser Class Plaintiffs (“Plaintiffs”), by undersigned counsel (“Class Counsel”) respectfully move for an order (i) approving the administrative determinations of settlement administrator, RG/2 Claims Administration (“RG/2 Claims”), concerning the Claim Forms submitted in this case; (ii) approving and authorizing the distribution of each Claimant’s share of the Net Settlement Fund to Claimants whose Claim Forms have been approved by RG/2 Claims; and (iii) approving payments to RG/2 Claims and to Econ One Research, Inc. (“Econ One”), the economic consultants retained by Class Counsel to assist RG/2 Claims with the claims administration process, for fees and expenses associated with the claims administration process and approving the withholding of up to \$1 million (\$1,000,000) from the distribution to cover estimated taxes owed¹ from the Settlement Fund² for interest earned on the funds.³

In support of this motion, Plaintiffs rely upon the Declaration of Matthew F. Gately in Support of Motion for Distribution from the Settlement Fund, the Declaration of Tina Chiango of RG/2 Claims in Support of Motion for Distribution

¹ As set forth in footnote 3 of the accompanying proposed order, only the amount owed in taxes would be removed from the Settlement Fund for payment of taxes.

² “Settlement Fund” is defined in the Settlement Agreement and “Net Settlement Fund” is defined in Direct Purchaser Plaintiffs’ Plan of Allocation for the Direct Purchaser Class. *See* ECF No. 1363-2, at 9; ECF No. 1363-3, at 2.

³ As set forth in footnote 3 of the accompanying proposed order, only the amount owed in taxes would be removed from the Settlement Fund for payment of taxes.

from the Settlement Fund (Exhibit 1 to the Gately Declaration), and a Statement in Lieu of Brief submitted herewith.

A [Proposed] Order Approving Direct Purchaser Class Plaintiffs' Motion for Distribution from the Settlement Fund is submitted herewith.

Dated: August 13, 2024

Respectfully submitted,

/s/Matthew F. Gately

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