

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

If you are a dispenser of drugs in the U.S. that purchased one or more Drugs at Issue from January 1, 2010, through March 5, 2024, a class action settlement may affect your rights.

A court authorized this notice. This is not a solicitation from a lawyer.

- A \$1 million Settlement has been reached in a class action antitrust lawsuit filed on behalf of the Indirect Reseller Plaintiffs and Defendant Breckenridge Pharmaceutical, Inc. (“Breckenridge” or “Settling Defendant”). The Settlement only applies to the Settling Defendant Breckenridge and does not dismiss the allegations against other Defendants in the lawsuit entitled *In re Generic Pharmaceuticals Pricing Antitrust Litigation*, Case No. 16-md-2724 (E.D. Penn.).
- If approved by the Court, the Settlement will resolve a lawsuit over whether Breckenridge participated in one or more unlawful conspiracies to raise, fix, maintain, and/or stabilize prices, rig bids, and allocate markets and customers for Drugs at Issue in violation of Section 1 of the Sherman Act and various state antitrust, unfair competition, unjust enrichment, and consumer protection laws.
- You are a “Settlement Class Member” if you satisfy the following: All dispensers of drugs (including hospitals and independent pharmacies) in the United States and its territories that purchased one or more of the Drugs at Issue directly from distributor AmerisourceBergen Corp., Cardinal, Red Oak, Harvard, H.D. Smith, McKesson, Morris & Dickson, or WBAD or their subsidiaries; and all dispensers of drugs (including hospitals and independent pharmacies) in the State Damages Jurisdictions that purchased one or more of the Drugs at Issue from any source other than the manufacturer Defendants from January 1, 2010, through March 5, 2024.
- The Drugs at Issue include any formulation of any drug that is the subject of the lawsuit. The State Damages Jurisdictions include Alabama, Arizona, California, Connecticut, District of Columbia, Delaware, Florida, Iowa, Kansas, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Oregon, Rhode Island, South Dakota, Tennessee, Utah, Vermont, West Virginia, and Wisconsin.
- Breckenridge is required to pay \$1,000,000. In addition to this monetary payment, Breckenridge has agreed to provide specified Cooperation in the continuing prosecution of the lawsuit.
- Recently, notice was provided regarding a settlement with Defendant Apotex Corp. and related or affiliated entities. This notice is for the Breckenridge Settlement, a new settlement within the same lawsuit. **You must submit separate Claim Forms for the Breckenridge Defendant and Apotex Defendant.**
- The Court has not decided whether Breckenridge did anything wrong, and Breckenridge denies any wrongdoing.

This notice may affect your rights. Please read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS		DEADLINE
EXCLUDE YOURSELF	Get no Settlement benefits but keep your right to file your own lawsuit against Breckenridge regarding the allegations in this lawsuit.	Postmarked by August 6, 2026
OBJECT TO THE SETTLEMENT	Write to the Court about why you do not like the Settlement. You will still be bound by the Settlement if the Court approves it.	Postmarked by August 6, 2026
SUBMIT A CLAIM FORM	The only way to get Settlement benefits is to submit a timely and valid Claim Form.	
DO NOTHING	Get no Settlement benefits. You will give up your rights to sue Breckenridge regarding the allegations in this lawsuit, and you will be bound by the judgment.	

- These rights and options—**and the deadlines to exercise them**—are explained in this notice.
- The Court must decide whether to approve the Settlement and the requested attorneys’ fees and expenses. Settlement benefits will not be provided unless the Court approves the Settlement.

Questions? Go to GenericPharmaceuticalsAntitrust.com or call 1-877-644-0182

BASIC INFORMATION

1. Why is this notice being provided?

A court authorized this notice because you have the right to know about the Settlement of this class action lawsuit and about all of your rights and options before the Court decides whether to grant final approval to the Settlement. This notice explains the lawsuit, the Settlement, and your legal rights.

2. What is this lawsuit about?

The Honorable Cynthia M. Rufe of the United States District Court for the Eastern District of Pennsylvania is overseeing this class action. The lawsuit is known as *In re Generic Pharmaceuticals Pricing Antitrust Litigation*, Case No. 16-md-2724 (the “lawsuit”).

The Indirect Reseller Plaintiffs (“Plaintiffs”) allege that the Defendants participated in one or more unlawful conspiracies to raise, fix, maintain, and/or stabilize prices, rig bids, and allocate markets and customers for Drugs at Issue in violation of Section 1 of the Sherman Act and various state antitrust, unfair competition, unjust enrichment, and consumer protection laws.

In this notice, “Defendants” refers to more than three dozen companies, corporations, and individuals involved in the sale and distribution of generic drugs (a complete list is available at GenericPharmaceuticalsAntitrust.com) and “Settling Defendant” refers to Breckenridge Pharmaceutical, Inc. The Plaintiffs have reached a Settlement with Breckenridge. However, the Plaintiffs’ lawsuit is still proceeding against other Defendants. **Those other Defendants may be subject to separate settlements, judgments, or class certification related orders. If applicable, you will receive a separate notice regarding the progress of the lawsuit and any resolution of allegations against the other Defendants.**

Breckenridge denies the allegations and denies any wrongdoing or liability. No court or other judicial entity has made any judgment or other determination of any wrongdoing by Breckenridge, or that any law has been violated. Instead, Plaintiffs and Breckenridge have agreed to a settlement to avoid the risk, cost, and time of continuing the lawsuit.

3. Why is the lawsuit a class action?

In a class action, one or more people or businesses (called class representatives) sue on behalf of all people or businesses who have similar allegations. Together, all of these people are called a class or class members. One court resolves the issues for all class members, except for those class members who timely exclude themselves (opt out) from the class.

The Class Representatives in this lawsuit are Plaintiffs Chet Johnson Drug, Deal Drug Pharmacy, Falconer Pharmacy, Halliday’s & Koivisto’s Pharmacy, North Sunflower Medical Center, Russell’s Mr. Discount Drugs, and West Val Pharmacy (“Class Representatives”).

4. Why is there a Settlement?

Plaintiffs and Breckenridge do not agree about the allegations made in this lawsuit. The lawsuit has not gone to trial, and the Court has not decided in favor of Plaintiffs or Breckenridge. Instead, Plaintiffs and Breckenridge have agreed to settle the lawsuit. The Plaintiffs, Breckenridge, and their lawyers believe the Settlement is best for all Settlement Class Members because of the risks and uncertainty associated with continuing the lawsuit.

WHO IS INCLUDED IN THE SETTLEMENT?

5. How do I know if I am part of the Settlement?

The Settlement Class includes:

All dispensers of drugs (including hospitals and Independent pharmacies) in the United States and its territories that purchased one or more of the Drugs at Issue directly from distributor AmerisourceBergen Corp., Cardinal, Red Oak, Harvard, H.D. Smith, McKesson, Morris & Dickson or WBAD or their subsidiaries; and all dispensers of drugs (including hospitals and independent pharmacies) in the State Damages Jurisdictions that purchased one or more of the Drugs at Issue from any source other than the manufacturer Defendants from January 1, 2010, through March 5, 2024.

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Hospitals include facilities that provide inpatient medical treatment with overnight accommodations as well as urgent-care clinics.

The State Damages Jurisdictions include Alabama, Arizona, California, Connecticut, District of Columbia, Delaware, Florida, Iowa, Kansas, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Oregon, Rhode Island, South Dakota, Tennessee, Utah, Vermont, West Virginia, and Wisconsin.

The Drugs at Issue include any formulation of any drug that is the subject of the lawsuit. A list of the Drugs at Issue can be found at GenericPharmaceuticalsAntitrust.com.

6. Are there exceptions to being included in the Settlement?

Yes. Specifically excluded from the Settlement Class are

- (a) Defendants, their officers, directors, management, employees, subsidiaries, and affiliates;
- (b) entities owned in part by judges or justices involved in this action or any members of their immediate families;
- (c) all pharmacies owned or operated by publicly traded companies; and
- (d) all hospitals owned or operated by federal government entities and any other government entities named as parties in this MDL or in related actions styled *Connecticut et al. v. Sandoz et al.*, Case No. 3:20-cv-00802 (D. Conn.), *Connecticut et al. v. Aurobindo et al.*, Case No. 3:16-cv-02056 (D. Conn.), and *Connecticut et al. v. Teva et al.*, Case No. 3:19-cv-00710 (D. Conn.).

If you are in one of these categories, you are not a Settlement Class Member and not eligible to participate in the Settlement.

7. What if I am still not sure whether I am part of the Settlement?

If you are still not sure whether you are a Settlement Class Member, you may visit the Settlement Website at GenericPharmaceuticalsAntitrust.com or call the Settlement Administrator toll-free at 1-877-644-0182.

THE BENEFITS OF THE SETTLEMENT

8. What does the Settlement with Breckenridge provide?

If the Settlement is approved, Breckenridge is required to pay \$1,000,000 to resolve all Settlement Class Members' allegations against Breckenridge for the Released Claims (as defined in the Settlement Agreement). In addition to this monetary benefit, Breckenridge has also agreed to provide specified Cooperation in the Indirect Reseller Plaintiffs' continued prosecution of the lawsuit. The Settlement Agreement is available at GenericPharmaceuticalsAntitrust.com.

9. What am I giving up to stay in the Settlement Class?

Unless you exclude yourself (opt out), you are choosing to remain in the Settlement Class. If the Settlement is approved and becomes final, all Court orders and any judgments will apply to you and legally bind you. You will not be able to sue, continue to sue, or be part of any other lawsuit against the Releasees ("Released Parties") about the legal issues in this lawsuit that are released by this Settlement. The specific rights you are giving up are called "Released Claims."

You are not releasing your allegations against any Defendant other than Breckenridge.

10. What are the Released Claims?

Section C of the Settlement Agreement describes the "Released Claims," and the Release in necessary legal terminology, so read this section carefully. The Settlement Agreement is available at GenericPharmaceuticalsAntitrust.com. For questions regarding the Release or Released Claims and what the language in the Settlement Agreement means, you can also contact one of the Settlement Class Counsel lawyers listed in Question 19 for free, or you can talk to your own lawyer at your own expense.

Questions? Go to GenericPharmaceuticalsAntitrust.com or call 1-877-644-0182

11. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will remain a Settlement Class Member and may participate in the Breckenridge Settlement and submit a timely and valid Claim Form. You will also have the opportunity to participate in any future settlements or judgments obtained against the other Defendants in the lawsuit. You will give up rights explained in the “Excluding Yourself from the Settlement” section of this notice, including your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against any of the Released Parties about the legal issues in this lawsuit that are released by the Settlement.

By staying in the lawsuit, you are not releasing your allegations against any Defendant other than Breckenridge.

HOW TO GET BENEFITS FROM THE SETTLEMENT

12. How do I make a claim for Settlement benefits?

You must submit a timely and valid Claim Form for Settlement benefits. Your Claim Form must be submitted online at GenericPharmaceuticalsAntitrust.com, or mailed to the Settlement Administrator at the address on the Claim Form. Claim Forms may be submitted until 90 days following the Court’s final approval of the Settlement Agreement. The court will hold a hearing on November 17, 2026, to determine whether to grant final approval of the Settlement. Claim Forms are available on the Settlement Website at GenericPharmaceuticalsAntitrust.com, by calling 1-877-644-0182, or by writing to the following address:

In re Generic Pharmaceuticals Pricing Antitrust Litigation
Breckenridge Defendant
Settlement Administrator
P.O. Box 2750
Portland, OR 97208-2750

You must submit separate Claim Forms for the Breckenridge Defendant and the Apotex Defendant.

13. When will I receive my Settlement benefits?

If you file a timely and valid Claim Form, Settlement benefits will be provided by the Settlement Administrator after the Settlement is approved by the Court and becomes final.

It may take time for the Settlement to be approved and become final. Please be patient and check GenericPharmaceuticalsAntitrust.com for updates.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you are a Settlement Class Member and want to keep any right you may have to sue or continue to sue the Released Parties on your own based on the allegations raised in this lawsuit or released by the Released Claims, then you must take steps to get out of the Settlement. This is called excluding yourself from—or “opting out” of—the Settlement.

14. How do I exclude myself from the Settlement with Breckenridge?

To exclude yourself from the Settlement, you must mail a written request for exclusion (“Request for Exclusion”), which includes the following:

- 1) Your name, address, and telephone number
- 2) A statement explaining why you wish to be excluded from the Breckenridge Settlement Class
- 3) The quantity, dollar amount, and information sufficient to show the purchases of Drugs at Issue

The Request for Exclusion must be **mailed** to the Settlement Administrator at the following address, and be **postmarked** by **August 6, 2026**:

Questions? Go to GenericPharmaceuticalsAntitrust.com or call 1-877-644-0182

In re Generic Pharmaceuticals Pricing Antitrust Litigation
 Breckenridge Defendant
 Settlement Administrator
 P.O. Box 2750
 Portland, OR 97208-2750

You cannot opt out (exclude yourself) by telephone or by email.

15. If I exclude myself, can I still get anything from the Settlement with Breckenridge?

No. If you exclude yourself, you will not be entitled to receive Settlement benefits, but you will not be bound by the Settlement or any judgment in this lawsuit against the Released Parties. You can only get Settlement benefits if you stay in the Settlement and submit a timely and valid Claim Form.

16. If I do not exclude myself, can I sue Breckenridge for the same thing later?

No. Unless you exclude yourself, you give up the right to sue the Released Parties for the allegations this the Settlement resolves. You must exclude yourself from this Settlement to start or continue with your own lawsuit or be part of any other lawsuit against the Released Parties. If you have a pending lawsuit against Breckenridge, speak to your lawyer in that case immediately.

By staying in the lawsuit, you are not releasing your allegations in this lawsuit against any Defendant other than Breckenridge.

OBJECTING TO THE SETTLEMENT

17. How do I tell the Court that I do not like the Settlement?

If you are a Settlement Class Member, you can tell the Court you do not agree with all or any part of the Breckenridge Settlement.

To object, you must timely file your objection with the Court, Settlement Class Counsel, and Breckenridge's counsel as provided below by **August 6, 2026**, stating you object to the Breckenridge Settlement in *In re Generic Pharmaceuticals Pricing Antitrust Litigation*, Case No. 16-md-2724.

To file an objection, you cannot exclude yourself from the Breckenridge Settlement Class. Your objection must include all of the following information:

- 1) A statement of intent to object
- 2) A detailed statement of the legal and factual grounds for each objection
- 3) A statement regarding whether you intend to appear at the Fairness Hearing
- 4) Your signature

Court	Settlement Class Counsel	Breckenridge Counsel
Clerk United States District Court for the Eastern District of Pennsylvania James A. Byrne U.S. Courthouse 601 Market Street Philadelphia, PA 19106	Christian Hudson Michael J. Flannery Cuneo Gilbert Flannery & LaDuca LLP 2445 M St., NW, Ste. 740 Washington, DC 20037	Donald W. Hawthorne Joseph Muschitiello Curtis Mallet-Prevost Colt & Mosle LLP 101 Park Ave. New York, NY 10178-0061

Any Settlement Class Member who fails to comply with the requirements for objecting detailed above will waive and forfeit any and all rights they may have to appear separately and/or to object to the Settlement Agreement and will be bound by all the terms of the Settlement Agreement and by all proceedings, orders, and judgments in the lawsuit.

Questions? Go to GenericPharmaceuticalsAntitrust.com or call 1-877-644-0182

18. What is the difference between objecting and excluding myself?

Objecting is telling the Court that you do not like something about the Settlement. You can object only if you do not exclude yourself from the Settlement Class. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class. If you exclude yourself, you cannot object because the Settlement no longer affects you.

THE LAWYERS REPRESENTING YOU

19. Do I have a lawyer in this case?

Yes, the Court has appointed Christian Hudson of Cuneo Gilbert Flannery & LaDuca, LLP as Settlement Class Counsel to represent you and the Settlement Class for purposes of the Settlement. You may hire your own lawyer at your own cost and expense if you want someone other than Settlement Class Counsel to represent you in this lawsuit.

20. How will Settlement Class Counsel be paid?

Settlement Class Counsel may ask the Court for attorneys' fees based on their services in this lawsuit. A reasonable amount of the Settlement Fund, not to exceed \$250,000, will be used toward notice to the Settlement Class. Any payment to Settlement Class Counsel or the Class Representatives would be subject to Court approval, and the Court may award less than the requested amount. The attorneys' fees, costs, expenses, and service awards that the Court orders, plus the costs to administer the Settlement, will come out of the Settlement Fund. Settlement Class Counsel may seek additional attorneys' fees, costs, expenses, and service awards from any other settlements or recoveries obtained in the future. When Settlement Class Counsel's motion for attorneys' fees, costs, expenses, and service awards is filed, it will be available at GenericPharmaceuticalsAntitrust.com.

THE FAIRNESS HEARING

21. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Fairness Hearing to decide whether to approve the Settlement on **November 17, 2026, at 11:00 a.m.** before the Honorable Cynthia M. Rufe at the 12614 U.S. Courthouse, 601 Market Street, Philadelphia PA, 19106. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and decide whether to approve the Settlement, Settlement Class Counsel's application for attorneys' fees, expenses, and costs, and the service awards to the Class Representatives.

If there are timely objections, the Court will consider them. The Court will listen to Settlement Class Members who have filed a timely objection and requested to speak at the hearing.

The date and time of the Fairness Hearing are subject to change without further notice to the Settlement Class. The Court may also decide to hold the hearing via video conference or by telephone. You should check the Settlement Website, GenericPharmaceuticalsAntitrust.com, to confirm the date and time of the Fairness Hearing has not changed.

22. Do I have to attend to the Fairness Hearing?

No. Settlement Class Counsel will answer any questions the Court may have. However, you are welcome to come at your own expense. If you file an objection, you do not have to come to Court to talk about it. As long as you file your written objection on time, the Court will consider it.

23. May I speak at the Fairness Hearing?

Yes, as long as you do not exclude yourself (opt out) and you file a timely written objection requesting to speak at the hearing, you can (but do not have to) participate and speak for yourself at the Fairness Hearing. This is called making an appearance. You also can have your own lawyer speak for you, but you will have to pay for the lawyer yourself.

If you want to appear, or if you want your own lawyer instead of Settlement Class Counsel to speak for you at the hearing, you must follow all of the procedures for objecting to the Settlement listed in Question 17 above—and specifically include a statement whether you or your lawyer will appear at the Fairness Hearing.

Questions? Go to GenericPharmaceuticalsAntitrust.com or call 1-877-644-0182

GETTING MORE INFORMATION

24. How do I get more information?

This notice summarizes the Settlement. Complete details about the Settlement are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at GenericPharmaceuticalsAntitrust.com. You may get additional information at GenericPharmaceuticalsAntitrust.com, by calling toll-free 1-877-644-0182, or by writing to the following address:

In re Generic Pharmaceuticals Pricing Antitrust Litigation
Breckenridge Defendant
Settlement Administrator
P.O. Box 2750
Portland, OR 97208-2750

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE.

Questions? Go to GenericPharmaceuticalsAntitrust.com or call 1-877-644-0182