UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS

IN RE: OPANA ER ANTITRUST

LITIGATION

THIS DOCUMENT RELATES TO: All Direct Purchaser Class Actions

MDL DOCKET NO. 2580 Case No. 1:14-cv-10150 (HDL)

NOTICE OF DIRECT PURCHASER CLASS PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF PROPOSED SETTLEMENT

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Bruce E. Gerstein, and exhibits attached thereto, Direct Purchaser Class Plaintiffs ("Plaintiffs") hereby move for the entry of the Final Approval Order proposed herewith, which (a) grants final approval to Plaintiffs' Settlement with Defendant Impax Laboratories, Inc. ("Impax") pursuant to Federal Rule of Civil Procedure 23(e); (b) approves Plaintiffs' plan of allocation for determining each Claimant's allocated share based upon each Claimant's purchases of brand and generic Opana ER from Endo and Impax; (c) approves awards of attorneys' fees and reimbursement of expenses to Class Counsel; (d) approves service awards for the Class Representatives; and (e) enters a Final Judgment and Order terminating the litigation between Plaintiffs and Impax.

The telephonic Final Fairness Hearing is scheduled for November 3, 2022, at 9:30 am. *See* ECF No. 1079.

Dated: October 24, 2022 Respectfully Submitted:

## /s/ Andrew C. Curley

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