

**COHN LIFLAND PEARLMAN
HERRMANN & KNOPF LLP**

Peter S. Pearlman
Matthew F. Gately
Park 80 West – Plaza One
250 Pehle Avenue, Suite 401
Saddle Brook, New Jersey 07663
(201) 845-9600 (telephone)
(201) 845-9423 (fax)
psp@njlawfirm.com
mfg@njlawfirm.com

Attorneys for the Direct Purchaser Plaintiff Class

(Additional counsel on signature page)

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

In re Effexor XR Antitrust Litigation

This Document Relates to:

Direct Purchaser Actions

Master Docket No.

3:11-cv-05479 (PGS/JBD)

**DIRECT PURCHASER CLASS PLAINTIFFS' UNOPPOSED
MOTION FOR CERTIFICATION OF A SETTLEMENT CLASS,
APPOINTMENT OF LEAD CLASS COUNSEL, PRELIMINARY
APPROVAL OF PROPOSED SETTLEMENT, APPROVAL OF THE
FORM AND MANNER OF NOTICE TO THE CLASS AND
PROPOSED SCHEDULE FOR A FAIRNESS HEARING**

Direct Purchaser Class Plaintiffs hereby move, unopposed, for certification for purposes of settlement of a class of direct purchasers, appointment of Lead Class Counsel, preliminary approval of their proposed Settlement Agreement with Wyeth LLC, Wyeth Pharmaceuticals, Inc., Wyeth-Whitehall Pharmaceuticals LLC, and

Wyeth Pharmaceuticals Company (collectively or individually, “Wyeth”), approval of the form and manner of notice to the settlement class, preliminary approval of the proposed Plan of Allocation, appointment of the Notice and Claims Administrator, appointment of the Escrow Agent, and a proposed schedule for a Fairness Hearing.

Direct Purchaser Class Plaintiffs submit a Proposed Order herewith.

Dated: April 9, 2024

Respectfully submitted,

/s/ Peter S. Pearlman
**COHN LIFLAND PEARLMAN
HERMANN & KNOPF LLP**
Peter S. Pearlman
Matthew F. Gately
Park 80 West, Plaza One
250 Pehle Avenue, Suite 401
Saddle Brook, NJ 07663
Tel.: (201) 845-9600
psp@njlawfirm.com
mfg@njlawfirm.com

Liaison Counsel for the Direct Purchaser Class Plaintiffs

BERGER MONTAGUE PC
David F. Sorensen
Caitlin G. Coslett
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Tel.: (215) 875-3000
dsorensen@bm.net
ccoslett@bm.net

**HAGENS BERMAN SOBOL
SHAPIRO LLP**
Thomas M. Sobol
Gregory T. Arnold
1 Faneuil Hall Sq., 5th Fl.
Boston, MA 02109
Tel.: (617) 482-3700
tom@hbsslaw.com
grega@hbsslaw.com

Peter Kohn
Neill W. Clark
FARUQI & FARUQI LLP
1617 JFK Blvd, Suite 1550

Bary S. Taus
Kevin S. Landau
**TAUS, CEBULASH & LANDAU,
LLP**

Philadelphia, PA 19103
Tel: (215) 277-5770
pkohn@faruqilaw.com
nclark@faruqilaw.com

123 William Street, Suite 1900A
New York, NY 10038
Tel.: (212) 931-0704
btaus@tcclaw.com
klandau@tcclaw.com

Dianne M. Nast
NASTLAW LLC
1101 Market Street, Suite 2801
Philadelphia, PA 19107
Tel.: (215) 923-9300
dnast@nastlaw.com

Don Barrett
BARRETT LAW GROUP, P.A.
404 Court Square
P.O. Box 927
Lexington, MS 39095
Tel.: (662) 834-2488
dbarrett@barrettlawgroup.com

Interim Executive Committee for the Direct Purchaser Class Plaintiffs