

EXHIBIT 4

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

In re Effexor XR Antitrust Litigation

Master Docket No.

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

This Document Relates to:

Direct Purchaser Actions

**DECLARATION OF WILLIAM W. WICKERSHAM OF RG/2
CLAIMS ADMINISTRATION LLC IN SUPPORT OF 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**

I, WILLIAM W. WICKERSHAM, hereby declare and state as follows:

1. I am the Senior Vice President of Business Development and Client Relations for RG/2 Claims Administration LLC ("RG/2"), whose address is 30 South 17th Street, Philadelphia, PA 19103. In that role, I oversee the intake and management of the claim administrations of the ongoing class action settlements handled by RG/2 Claims, including the creation and implementation of legal notice plans. I have been involved in the development and implementation of plans for class action notification for more than 12 years.

2. I submit this declaration at the request of Counsel for the Direct Purchaser Class Plaintiffs in order to provide more information about RG/2 Claims

and to describe the proposed notice plan and notice services in the above-captioned litigation.

3. I have personal knowledge of the matters set forth in this declaration and, if called as a witness, could and would testify competently thereto.

4. RG/2 Claims was established in 2002 as a full service class action notice and claims administrator, providing notice and administration services for a broad range of collective actions, including but not limited to antitrust, securities, consumer, and employment cases. RG/2 Claims specializes in the creation, development and implementation of legal notification plans. Accordingly, RG/2 Claims is familiar with, and guided by Constitutional due process provisions, rules of states and local jurisdictions, and the relevant case law relating to legal notification. Since 2002, RG/2 Claims has administered and distributed in excess of \$2.0 billion in class-action settlement proceeds. More information about RG/2 is available at <https://www.rg2claims.com/>.

5. With Court approval, RG/2 Claims has provided notice and settlement administration services in several other direct purchaser pharmaceutical antitrust cases, on behalf of classes that include many of the same entities included in the proposed settlement class (the “Direct Purchaser Class” or “Class”) in this case, including:

- *In re Lidoderm Antitrust Litig.*, No. 14-md-02521 (N.D. Cal.);

- *In re Loestrin 24 Fe Antitrust Litig.*, No. 1:13-md-2472 (D. R.I.);
- *In re Restasis (Cyclosporine Ophthalmic Emulsion) Antitrust Litig.*, No. 18-md-2819 (E.D.N.Y.);
- *In re Opana ER Antitrust Litig.*, MDL No. 2580 (N.D. Ill.);
- *In re Suboxone (Buprenorphine Hydrochloride and Naloxone) Antitrust Litig.*, MDL No. 2445 (E.D. Pa.);
- *In re Niaspan Antitrust Litig.*, MDL No. 2460 (E.D. Pa.); and
- *In re: Novartis and Par Antitrust Litigation*, No. 18-cv-04361 (S.D.N.Y.).

6. RG/2 was also recently appointed as the Notice and Claims Administrator in *In re Lipitor Antitrust Litig.*, MDL No. 2332 (D.N.J.).

7. The objective of the suggested Notice program is to provide the best notice practicable—Rule 23-compliant notice—to members of the Class.

8. The notice program includes the following elements:

- a. Direct notice via United States Postal Service Mail (“USPS Mail”) to the Class members.¹ These Class members have been identified using the data produced by Wyeth and Teva in this litigation.

¹ I understand that “the Class” or “Direct Purchaser Class” is defined as follows:

All persons or entities in the United States and its territories who purchased Effexor XR and/or AB-rated generic versions of Effexor XR directly from any of the Defendants at any time during the period June 14, 2008 through and until May 31, 2011 (the “Class Period”).

Excluded from the Direct Purchaser Class are Defendants and their officers, directors, management, employees, subsidiaries, or affiliates, all governmental entities, and all persons or entities that purchased Effexor XR directly from Wyeth during the Class Period that did not

b. In addition to mailing of the notice, RG/2 Claims will also maintain a toll-free number to answer and address any class member inquiries. The notice mailed to Class members will include this toll-free number, as well as directions to Lead Class Counsel's websites, which will include information about the settlement, including a copy of the Court's preliminary approval order and Notice.

9. The proposed notice plan provides the best practicable method to reach the potential Class members and is consistent with other class action notice plans that have been approved by various federal courts for similarly situated matters, including those referenced in paragraph 5 of this declaration.

10. For the USPS mailing addresses, RG/2 Claims will run the contact information obtained through the USPS National Change of Address system ("NCOA"). The NCOA system provides updated addresses for all mail recipients who have filed a change of address with the post office within the past four years

also purchase generic Effexor XR directly.

Also excluded from the Class for purposes of this Settlement Agreement are the following: Walgreen Co., The Kroger Co. (including Peytons), Safeway, Inc., United Natural Foods, Inc. f/k/a Supervalu Inc., H-E-B, L.P. f/k/a HEB Grocery Company, L.P., American Sales Company, Inc., Rite Aid Corporation, Rite Aid Hdqtrs. Corporation, JCG (PJC) USA, LLC, Maxi Drug, Inc. d/b/a/ Brooks Pharmacy, Eckerd Corporation, Meijer, Inc., Meijer Distribution, Inc., Giant Eagle, Inc., and CVS Caremark Corporation (including Caremark and Omnicare) (collectively, "Retailer Plaintiffs").

and helps to ensure that we have the most current addresses on file with the USPS. By this means, we will maximize the effectiveness of the direct mail and minimize returned undeliverable mail. RG/2 Claims already has contact information for numerous Class members based on RG/2 Claims having served notice and claim forms in other cases involving similar classes and will use this contact information as needed to contact Class members as part of the claims administration process.

11. After the NCOA update, RG/2 Claims will mail the Notice via USPS mail to all Class members using the addresses in the data produced by Defendants and other known addresses identified as a result of the NCOA update, including addresses in RG/2's database as a result of previously administering notice and claims in other similar cases with overlapping membership, as described above..

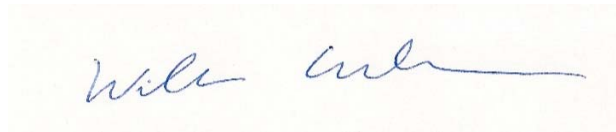
12. Any undeliverable mail that is returned to RG/2 Claims will be sorted and scanned. For Class members whose notices are returned without a forwarding address, RG/2 Claims will use Accurint (a division of Lexis-Nexis) to perform a basic "skip trace" search in order to retrieve the most accurate and updated information for the Class member. The database will be updated with any new address(es) found and the Notice will be re-mailed to the updated addresses.

13. RG/2 Claims believes this notice program is suitable for this case and is comparable to plans other federal courts have approved for similar cases. RG/2 Claims also believes that the Notice is drafted in the "plain language" format

preferred by federal courts and provides the information required by Rule 23. RG/2 Claims believes that the Notice is understandable for Direct Purchaser Class members and complies with due process.

14. RG/2 consents to be subject to the jurisdiction of the United States District Court for the District of New Jersey for matters related to its work in connection with this matter.

I declare under penalty of perjury that the forgoing is true and correct.
Executed this 9th day of April, 2024 in Wilton, CT.

A handwritten signature in blue ink, appearing to read "Wills Wick", is written on a light-colored rectangular background.

WILLIAM W. WICKERSHAM