

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

NOTICE OF CLASS ACTION SETTLEMENTS

If you are a Third-Party Payor that paid or reimbursed costs for prescription opioids or paid or incurred costs for treatment related to opioid misuse, addiction, and/or overdose, a class action lawsuit may affect your rights.

*This Notice is being provided by Order of the U.S. District Court.
It is not a solicitation from a lawyer. You are not being sued.*

A lawsuit is pending in the United States District Court for the Northern District of Ohio (the “Court”) where Third-Party Payor Plaintiffs claim that Defendants played a central role in the opioid crisis. They claim that to sell as many prescription opioids as possible, opioid drug manufacturers misrepresented the risks and safety of long-term prescription opioid use, drug distributors did not properly monitor or report suspicious orders, and pharmacies filled opioid prescriptions that were not written for legitimate medical purposes. Defendants deny any wrongdoing.

Settlements have been reached with Allergan Finance, LLC, Teva Pharmaceuticals USA, Inc., Janssen, and certain affiliates (the “Settling Manufacturers”) and CVS, Walgreens, Walmart, and certain affiliates (the “Settling Pharmacies”) (together, the “Settling Defendants”). Collectively, these settlements for Third-Party Payors (“TPPs”) provide for a cash payment of \$180 million (the “Settlement”). The Settlements are subject to Court approval.

Your legal rights and options are explained below.

Plaintiffs will ask the Court to certify for Settlement the following “TPP Class”:

All entities that: (i) paid and/or were reimbursed for Products manufactured, marketed, sold, distributed, or dispensed by any of the Defendants and/or Alleged Opioid Enterprise Members for purposes other than resale; and/or (ii) paid or incurred costs for treatment, services, or procedures related to the use of, misuse of, addiction to, and/or overdose from Products and other opioid drugs, on behalf of individual beneficiaries, insureds, and/or members, during the time period from January 1, 1996 to [Month 00, 2026].

For clarity, the Class includes but is not limited to: (a) private contractors of Federal Health Employee Benefits plans; (b) plans for self-insured local governmental entities that have not settled claims in MDL No. 2804; (c) managed Medicaid plans; (d) plans operating under Medicare Part C and/or D; (e) Taft-Hartley plans; and (f) ERISA plans.

The following are excluded from the Class:

(a) all federal governmental entities and all state and local governmental entities whose claims have been released by a prior settlement with the Settling Defendants; (b) Pharmacy Benefit Managers (“PBMs”); (c) consumers; (d) fully insured plan sponsors; (e) the Settling Defendants and their subsidiaries, affiliates,

and controlled persons; (f) officers, directors, agents, servants, or employees of any Settling Defendant and the immediate family members of any such persons; (g) persons and entities named as Defendants in any of the Actions coordinated under or Parallel to MDL No. 2804, unless such persons or entities are only Defendants due to a counter-claim or cross-claim by other Defendant(s); and (h) anyone that excluded themselves from the Class.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
CLAIM YOUR SHARE OF THE SETTLEMENT	If you are a member of the TPP Class and want to participate in the distribution of the Settlement Funds, you need to complete and return a Claim Form. The Claim Form, and information on how to submit it, are available on the Settlement website. Claim Forms must be postmarked (if mailed) or received (if submitted online) on or before [Month 00, 2026]. If you previously submitted a claim in the prior TPP class settlement in MDL 2804 with Settling Distributors, then you may choose to rely on your previously submitted claim form.
EXCLUDE YOURSELF FROM THE TPP CLASS	This option allows you to exclude yourself from the TPP Class in one or more of these Settlements and instead file your own lawsuit against Settling Defendants that asserts claims related to the allegations or claims in this case. The exclusion deadline is [Month 00, 2026]. See Question 12.
OBJECT TO THE SETTLEMENTS OR SPEAK AT THE FAIRNESS HEARING	If you object to all or any part of the Settlements, request for attorneys' fees, reimbursement of expenses, or service awards to the Class Representatives, or desire to speak in person at the Fairness Hearing, you must file a written letter of objection and/or a notice of intention to speak with the Court by [Month 00, 2026]. See Question 17.

DO NOTHING	You will not participate in distribution of the Settlement Funds with the Settling Defendants, and you release your claims against the Settling Defendants and give up your rights to be part of any other lawsuit that asserts claims related to the allegations or claims against the Settling Defendants in this case. If there are future settlements or judgments with other Defendants, you will be notified about how to participate at that time.
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THESE RIGHTS AND OPTIONS AND THE DEADLINES TO EXERCISE THEM ARE EXPLAINED IN THIS NOTICE.

PLEASE VISIT THE TPP CLASS SETTLEMENT WEBSITE ON AN ONGOING BASIS FOR IMPORTANT SETTLEMENT- AND CLAIMS-RELATED UPDATES, INFORMATION, AND FILINGS: [www.tppopioidsettlement.com].

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BASIC INFORMATION ABOUT THE LAWSUIT

1. **Why did I get this Notice?**

You received this Notice because you requested it or records show that you may be a member of the TPP Class. On **[Month 00, 2026]**, the Court granted preliminary approval to the Settlements and will decide at the Fairness Hearing whether to certify the TPP Class for those Settlements. The Settling Defendants deny any wrongdoing. You are not being sued. This Notice describes the lawsuit and the rights and options you have.

2. **What is the lawsuit about?**

Plaintiffs claim that Defendants played a central role in the opioid crisis. They claim that to sell as many prescription opioids as possible, manufacturers misrepresented the risks and safety of long-term prescription opioid use, distributors did not properly monitor or report suspicious orders, and pharmacies filled opioid prescriptions that were not written for legitimate medical purposes.

Plaintiffs claim that Defendants' conduct caused substantial, direct, and proximate harm to Third-Party Payor Plaintiffs. Because of the opioid crisis, TPPs claim they have wrongfully had to pay large costs for opioid prescriptions and opioid use disorder treatment.

Settling Defendants deny these claims and that they did anything wrong. The litigation is proceeding, and, at this point, the Court has not decided who is right.

3. **Who are the Settling Defendants?**

The Settling Manufacturers are Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Cephalon, Inc., Watson Laboratories, Inc., Warner Chilcott Company, LLC, Actavis Pharma, Inc., Actavis South Atlantic LLC, Actavis Elizabeth LLC, Actavis Mid Atlantic LLC, Actavis Totowa LLC, Actavis LLC, Actavis Kadian LLC, Actavis Laboratories UT, Inc., and Actavis Laboratories FL, Inc. ("Teva"); Allergan Finance, LLC; Allergan Limited, Allergan Sales, LLC, and Allergan USA, Inc. ("Allergan"); and Johnson & Johnson, Janssen Pharmaceuticals, Inc., Ortho-McNeil-Janssen

Pharmaceuticals, Inc. (n/k/a Janssen Pharmaceuticals, Inc.), and Janssen Pharmaceutica (“Janssen”).

The Settling Pharmacies are CVS Indiana, LLC, CVS RX Services, Inc., CVS TN Distribution, LLC, CVS Orlando Florida Distribution, LLC, and CVS Pharmacy Inc., Oklahoma CVS Pharmacy, L.L.C. (“CVS”); Walgreen Co. and Walgreen Eastern Co., Inc. (“Walgreens”); and Walmart Inc. f/k/a Wal-Mart Stores, Inc., and Wal-Mart Stores East, LP (“Walmart”).

4. What is the current status of the lawsuit?

The lawsuit is currently pending in the United States District Court for the Northern District of Ohio before United States District Judge Dan A. Polster. The case name and number are *In Re: National Prescription Opiate Litigation*, No. 1:17-md-2804. Third-Party Payor Plaintiffs have reached Settlement Agreements with the Settling Defendants where the Settling Defendants will pay a total of \$180 million, as set forth in the Settlement Agreements, if the Court approves the Settlement. If the Court approves this Settlement, it will resolve the claims against the Settling Defendants.

5. What is a class action, and who is involved?

In class actions, one or more people (or businesses) called the “class representatives” sue on behalf of themselves and other people with similar claims in the specific class action. All of these people together are the “class” or “class members.” In a class action, one court may resolve the issues for all class members, except for those who exclude themselves from the class.

DETERMINING IF YOU ARE A MEMBER OF THE TPP CLASS

6. I am a Third-Party Payor that has purchased or reimbursed costs of prescription opioids, or paid or reimbursed for opioid-related treatment; how do I know if I am a member of the TPP Class?

As a **Third-Party Payor**, you may be a member of the TPP Class if you are included in the definitions below:

Third-Party Payors generally include health insurance companies, third-party administrators, health maintenance organizations, health and welfare plans that make payments from their own funds, and other health benefit providers and entities with self-funded plans that contract with a health insurer or administrator to administer their prescription drug benefits.

Third-Party Payors also generally include private entities that may provide prescription drug benefits for current or former public employees and/or public benefits programs, but only to the extent that such a private entity purchased or reimbursed costs of prescription opioids or paid or reimbursed for opioid-related treatment for consumption by its members, employees, insureds, participants, or beneficiaries.

In this case, you are in the TPP Class if you are an entity that: (i) paid and/or were reimbursed for Products manufactured, marketed, sold, distributed, or dispensed by any

of the Defendants and/or Alleged Opioid Enterprise Members for purposes other than resale; and/or (ii) paid or incurred costs for treatment, services, or procedures related to the use of, misuse of, addiction to, and/or overdose from Products and opioid drugs, on behalf of individual beneficiaries, insureds, and/or members, during the time period from January 1, 1996 to [Month 00, 2026].

The TPP Class includes: (a) private contractors of Federal Health Employee Benefits plans; (b) plans for self-insured local governmental entities that have not settled claims in MDL No. 2804; (c) managed Medicaid plans; (d) plans operating under Medicare Part C and/or D; (e) Taft-Hartley plans; and (f) ERISA plans.

The TPP Class does not include: (a) federal governmental entities and state and local governmental entities; (b) PBMs; (c) consumers; (d) fully insured plan sponsors; (e) the Settling Defendants and their subsidiaries, affiliates, and controlled persons, their officers, directors, agents, servants, or employees, and the immediate family members of any such persons; (f) persons and entities named as Defendants in any of the Actions coordinated under or parallel to MDL No. 2804, unless such persons or entities are only Defendants due to a counter-claim or cross-claim by other Defendant(s); and (g) anyone that excluded themselves from the TPP Class.

If you are not sure whether you are included in the TPP Class, you may call **1-877-411-4860**, email info@tppopioidsettlement.com, write to In re National Prescription Opiate Litigation Settlement, c/o A.B. Data, Ltd., P.O. Box 173026, Milwaukee, WI 53217-8042, or contact the lawyers in this case at the telephone numbers or addresses listed in Question 18 below. The full TPP Class definition and lists of some entities known to be in the TPP Class can also be found in the Settlement Agreement posted on the Settlement website at **www.tppopioidsettlement.com**.

7. What do the Settlements provide?

The Settlement Funds, if approved by the Court, will total \$180 million.

Settling Manufacturer Defendant	Settlement Amount
Allergan	\$10 million
Janssen	\$40 million
Teva	\$45 million
Settling Pharmacies	\$85 million
Total	\$180 million

Any interest earned will be added to the Settlement Funds. After deduction of attorneys' fees, reimbursement of litigation expenses, service awards to the Class Representatives, and notice and claims administration costs, as approved by the Court, the remaining Settlement Funds will be available for distribution to members of the TPP Class that timely file valid claims.

More details about the Settlements are provided in the Settlement Agreements, available at **www.tppopioidsettlement.com**.

8. How does a TPP make a claim for its share of the Settlement Funds?

To make a claim for your share of the Settlements, you must complete and submit a valid Claim Form. You can obtain a Claim Form at www.tppopioidsettlement.com or by calling 1-877-411-4860. Claim Forms must be received (if submitted online) or postmarked (if mailed) by [Month 00, 2026].

9. How much money can a TPP receive?

At this time, it is unknown how much each eligible TPP Class Member that submits a valid claim will receive. Payments to qualified claimants will be calculated on a proportional (or *pro rata*) basis. The amount of your payment will be calculated based on the Proposed Plan of Allocation available at www.tppopioidsettlement.com.

10. When will the TPPs receive payment?

The Court must approve the Settlements, and any appeals of that decision must be resolved, before any money is distributed to TPP Class Members. The Notice and Claims Administrator must also complete processing of all the Claim Forms and determine distribution amounts. This process can take several months. Teva and two of the Settling Pharmacies are paying over a period of time, and that may impact the timing of distribution payments.

Defendant	Payment Schedule
Teva	First payment: No later than fourteen (14) calendar days after Teva's deadline to exercise its Walk Away Right. Second payment: March 1, 2028
Allergan	One payment: Within thirty (30) calendar days of the Effective Date.
Janssen	One payment: May 15, 2026
Settling Pharmacies (CVS, Walgreens, and Walmart)	First payment (CVS, Walgreens, and Walmart): Within thirty (30) calendar days of the Effective Date. Second payment (CVS and Walgreens only): Within twelve (12) months of the Effective Date.

11. What happens if there are funds remaining after distribution?

If there are any funds remaining after distribution is complete, those funds will be distributed as the Court orders. No remaining funds will be returned to the Defendants.

EXCLUSION PROCESS

12. What does it mean to request to be excluded from the Settlements?

If the TPP does not want to be part of the TPP Class in these Settlements, does not want to file a claim for a Settlement payment, and wants to keep its right to sue the Settling Defendants for the allegations in *In Re: National Prescription Opiate Litigation*, No. 1:17-md-2804, then it must take steps to remove itself. This is called excluding yourself, or “opting out.” If you exclude yourself, you may not make a claim for a Settlement payment described in this Notice, and you may pursue your own lawsuit.

13. What is the Exclusion Process?

Your decision to stay in, or exclude yourself from, the Settlements is an individual one that must be made, signed, and submitted by you or your representative who is expressly authorized to do so.

Third-Party Payors that want to be excluded from the TPP Class must submit a written request for exclusion to the Notice and Claims Administrator, Co-Lead Settlement Class Counsel, and Settling Defendants. Your request for exclusion must include:

- The title “Opt-Out Form;”
- The name and number of this case, *In Re: National Prescription Opiate Litigation*, No. 1:17-md-2804;
- Your name, address, telephone number, and email address (if available);
- A statement that, under penalty of perjury, you are a legally authorized representative of the TPP Class Member who has the authority to exclude this entity from the Settlement;
- The entity’s name, address, telephone number, and email address (if available);
- A statement or other proof showing that the entity would be a TPP Class Member if it does not exclude itself;
- A statement that the entity wishes to be excluded from the TPP Class;
- The complaint and docket number of any case in which entity is a plaintiff against the Settling Defendants related to the allegations in this litigation; and
- Your signature.

Signed exclusion requests must be received by the Notice and Claims Administrator at the following address no later than **[Month 00, 2026]**:

In re National Prescription Opiate Litigation
EXCLUSIONS
P.O. Box 173026
Milwaukee, WI 53217

A copy of the signed exclusion request must also be emailed to the Settlement Administrator, Co-Lead Settlement Class Counsel, and the Settling Defendants at the following email address no later than **[Month 00, 2026]**:

[A.B. Data Email Address]

A separate, signed exclusion request must be submitted by each Third-Party Payor choosing to be excluded from the TPP Class. Any Third-Party Payor included in the TPP Class that does not submit a valid request for exclusion providing all necessary information will be bound by the outcome of the case.

14. What is the legal significance of excluding myself?

If you exclude yourself, you will not be able to claim any of the Settlement Funds and will not be legally bound by the outcome of the case. You may be able to sue the Settling Defendants for the same conduct alleged in the lawsuit.

15. If I don't exclude myself, can I sue later?

No. If you do not exclude yourself (that is, if you remain in the TPP Class and are eligible to receive a distribution from the Settlement Funds), then you give up the right to sue the Settling Defendants for the claims in this case. You must exclude yourself from the TPP Class to be able to bring your own, separate lawsuit(s) against the Settling Defendants. Remember, the exclusion deadline is **[Month 00, 2026]**.

IF YOU DO NOTHING

16. What happens if I do nothing at all?

If you are a TPP Class Member and you do nothing, you will remain in the TPP Class and be bound by the decisions in this lawsuit and about the Settlements. However, if the Settlements are approved, then you may be able to participate in the Settlements as described in this Notice.

To participate in the Settlements and be eligible to receive a payment, you must complete, sign, and return the Claim Form before the claims filing deadline, **[Month 00, 2026]**. However, if you previously submitted a claim in the prior class settlement in MDL 2804 on behalf of a TPP Settlement Class with Settling Distributors, then you may choose to rely on your previously submitted claim form.

If there are future settlements or judgments with other Non-Settling Defendants, then you will be notified about how to participate at that time.

OBJECTIONS OR COMMENTS

17. How do I object to or comment on the Settlements?

If you are a member of the TPP Class as defined above, and if you did not request to be excluded, then you may object to any aspect of the Settlements, including the fairness of the Settlements, the Plan of Allocation, and/or the Class's requests for attorneys' fees and costs, reimbursement of expenses, or service awards to the Class Representatives.

To object to the Settlements, you (or your lawyer if you have one) must file a written objection with the Court and send the objection to the Notice and Claims Administrator,

Co-Lead Settlement Class Counsel, and Settling Defendants at the addresses listed below. You must submit your objection on or before **[Month 00, 2026]**.

Your objection must include:

- Your full name, address, telephone number, and email;
- The case name and number: *In Re: National Prescription Opiate Litigation*, No. 1:17-md-2804;
- A statement that you are objecting to one or more of the Settlements, Plan of Allocation, application for attorneys' fees and expenses, and/or application for service awards to Class Representatives;
- A statement describing your objection(s);
- Any legal support or evidence, such as documents, materials, papers, or briefs, you want the Court to consider;
- A statement saying whether your objection(s) relate(s) only to you, to part of the TPP Class, or to the entire TPP Class;
- Documents proving that you are a TPP Class Member;
- The name, address, telephone number, and email address (if available) of all attorneys representing you (if any);
- A list of all class actions to which you and the attorney(s) representing you (if any) have previously objected;
- A statement saying whether you and/or your attorney intend to appear at the Fairness Hearing;
- A statement confirming that you will submit to the jurisdiction of the Court and agree to follow all Court decisions, including about your objection, your request to be heard, and the Settlement; and
- Your signature.

You must submit your objection to the Court and to the Notice and Claims Administrator postmarked or filed by **[Month 00, 2026]**.

Clerk of Court	Notice and Claims Administrator
Office of the Clerk of Court U.S. District Court for the Northern District of Ohio, Eastern Division Carl B. Stokes U.S. Courthouse 801 West Superior Avenue Cleveland, OH 44113	In re National Prescription Opiate Litigation P.O. Box 173026 Milwaukee, WI 53217 info@tppopioidsettlement.com

You must also email a copy of your objection to the Settlement Administrator, Co-Lead Settlement Class Counsel, and Settling Defendants at the following address:

[A.B. Data Email Address]

A Fairness Hearing will be held on [Month 00, 2026, at 00:00 X.m.], as subject to change by the Court. If you would like to attend the Fairness Hearing, please monitor the Settlement website for information on how to attend and for information regarding any changes in time or date.

THE LAWYERS REPRESENTING YOU

18. As a member of the TPP Class, do I have a lawyer representing my interests in this litigation?

Yes. The Court has appointed lawyers to represent you and other TPP Class Members. These lawyers are called Co-Lead Settlement Class Counsel. You will not be charged individually for these lawyers. They will ask the Court to approve an award for attorneys' fees and expenses. The following lawyers represent the TPP Class:

Paul J. Geller
ROBBINS GELLER RUDMAN & DOWD LLP
225 NE Mizner Boulevard, Suite 720
Boca Raton, FL 33432
(561) 750-3000
Co-Lead Settlement Class Counsel

Elizabeth J. Cabraser
LIEFF CABRASER HEIMANN & BERNSTEIN LLP
275 Battery Street, Suite 2900
San Francisco, CA 94111
(415) 956-1000
Co-Lead Settlement Class Counsel

James R. Dugan, II
THE DUGAN LAW FIRM, APLC
One Canal Place – Suite 1000
365 Canal Street
New Orleans, LA 70130
(504) 648-0180
Co-Lead Settlement Class Counsel

19. How will the lawyers be compensated? Will the Class Representatives receive a service award?

Class Counsel may seek up to 20% of the Settlement Funds for reimbursement of their fees, in addition to reimbursement of expenses and service awards for the Class Representatives.

The Class Representatives are the Cleveland Bakers and Teamsters Health and Welfare Fund; Pipe Fitters Local Union No. 120 Insurance Fund; Pioneer Telephone Cooperative, Inc. Employee Benefits Plan; American Federation of State, County, and Municipal

Employees District Council 37 Health & Security Plan; Louisiana Assessors' Insurance Fund; United Food and Commercial Workers Health and Welfare Fund of Northeastern Pennsylvania; and Sheet Metal Workers Local No. 25 Health & Welfare Fund.

Any fees and expenses awarded to Class Counsel must be approved by the Court. Class Counsel will ask the Court to award \$50,000 for the four Class Representatives that are TPP Bellwether Plaintiffs, and a service award of \$10,000 for the three other Class Representatives. The application for attorneys' fees and expenses and service awards will be posted on the Settlement website.

20. Do I have to attend the Fairness Hearing?

No. Class Counsel will answer any questions the Court may have. But you may attend at your expense. If you send an objection or comment, then you do not have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also hire your own lawyer at your own expense to attend on your behalf, but you are not required to do so.

21. May I appear through my own lawyer?

You may appear through your own lawyer, pursuant to Federal Rule of Civil Procedure 23(c)(2). Every lawyer appearing in this case is subject to the Orders of the Court, and you may be responsible for paying your lawyer's fees. If you hire a lawyer to speak for you or appear in Court, then your lawyer must file a Notice of Appearance.

GETTING MORE INFORMATION

22. Where do I get more information?

Important information, including the Settlement Agreements, Plan of Allocation, Claim Form, Court Orders, and other important documents, dates, and deadlines are posted for your review on the Settlement website: **www.tppopioidsettlement.com**. **Please refer to the Settlement website for ongoing and updated information, or you can call the Notice and Claims Administrator toll-free at 1-877-411-4860.**

Complete copies of public pleadings, Court rulings, and other filings are also available for review and copying at the Clerk's office. The address is Carl B. Stokes U.S. Courthouse, 801 West Superior Avenue, Cleveland, OH 44113. Judge Dan A. Polster of the United States District Court for the Northern District of Ohio is overseeing the litigation. *Please do not contact the Court or Judge Polster.*

For more information, call the Notice and Claims Administrator at 1-877-411-4860, email info@tppopioidsettlement.com, or go to www.tppopioidsettlement.com.

DATED: MONTH 00, 2026

BY ORDER OF THE UNITED STATES DISTRICT
COURT NORTHERN DISTRICT OF OHIO
EASTERN DIVISION