

**THE UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT**

STATE OF CONNECTICUT, et al.,

*Plaintiffs,*

v.

AUROBINDO PHARMA USA, INC., et al.,

*Defendants.*

No. 3:16-cv-02056-MPS

STATE OF CONNECTICUT, et al.,

*Plaintiffs,*

v.

TEVA PHARMACEUTICALS USA, INC. et al.,

*Defendants.*

No. 3:19-cv-00710-MPS

STATE OF CONNECTICUT, et al.,

*Plaintiffs,*

v.

SANDOZ, INC., et al.,

*Defendants.*

No. 3:20-cv-00802-MPS

March 26, 2025

**PLAINTIFF STATES' MOTION FOR PRELIMINARY APPROVAL OF  
SETTLEMENT WITH APOTEX CORP.**

The Plaintiff States hereby respectfully move the Court for an order as follows: (1) preliminarily approving the Plaintiff States' Settlement Agreement ("Settlement") with Apotex Corp. ("Apotex"), (2) approving Huntington Bank as the Escrow Agent for the Settlement Payment, (3) staying litigation against Apotex until the Court decides whether to grant final approval of the Settlement, (4) approving Rust Consulting Inc. as the Notice and Claims Administrator, (5) approving the Notice Plan for providing notice to consumers, (6) approving a

70/30 percentage split and allocation of the State Settlement Amount between restitution and cost escrow, (7) approving a 45.08/24.94 percentage split and allocation of the State Settlement Amount between Consumers and State Entities who are State Releasors, (8) approving a framework for distribution of the State Settlement Amount to Consumers and deferring approval of a final distribution plan until a later appropriate date, and (9) setting a date and time for a final approval hearing.

This Motion is supported by the accompanying Memorandum of Law in Support of the State's Motion; States Declaration in Support of the State's Motion, Exhibit 1 (Settlement Agreement); Declaration of Tiffany Janowicz in Support of State's Motion with Exhibits A (Long Form Notice), Exhibit B (Short Form Notice), Exhibit C (website screen shots), and Exhibit D (digital ads screen shots); and provides a Proposed Order.

Respectfully submitted, March 26, 2025

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<sup>1</sup> Counsel for Plaintiff State of Connecticut represents the consent of all Plaintiffs in the above captioned case pursuant to Section XI.D. of the Electronic Filing Policies and Procedures.

**CERTIFICATE OF SERVICE**

I hereby certify that on March 26, 2025 the foregoing document, together with the accompanying Memorandum, Declarations (2), and Proposed Order, was served by e-mail on all counsel of record in this action by operation of the Court's Electronic Filing System as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

Dated: March 26, 2025

/s/ Saami Zain  
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Assistant Attorney General