James E. Cecchi (N.J. Bar No. 030861989) CARELLA, BYRNE, CECCHI, OLSTEIN, BRODY & AGNELLO, P.C. 5 Becker Farm Road Roseland, NJ 07068 Telephone: (973) 994-1700 Facsimile: (973) 994-1744 jcecchi@carellabyrne.com Lauren A. Ormsbee (admitted *pro hac vice*) BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP 1251 Avenue of the Americas New York, New York 10020 Telephone: (212) 554-1593 Facsimile: (212) 554-1400 lauren@blbglaw.com

Attorneys for Plaintiff Cambridge Retirement System

CAMBRIDGE RETIREMENT SYSTEM, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

AMNEAL PHARMACEUTICALS INC., CHINTU PATEL, CHIRAG PATEL, BRYAN M. REASONS, PAUL M. BISARO, ROBERT L. BURR, ROBERT A. STEWART, KEVIN BUCHI, PETER R. TERRERI, JANET VERGIS, GAUTAM PATEL, TED NARK, EMILY PETERSON ALVA, JEAN SELDEN GREENE, DHARMENDRA J. RAMA, and AMNEAL PHARMACEUTICALS HOLDINGS, LLC,

Defendants.

## SUPERIOR COURT OF NEW JERSEY SOMERSET COUNTY: LAW DIVISION

Docket No. SOM-L-1701-19

Civil Action (CBLP Action)

## NOTICE OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF SETTLEMENT AND PLAN OF ALLOCATION

**PLEASE TAKE NOTICE** that on Monday August 15, 2022, at 9:00 a.m., the undersigned counsel for Plaintiff Cambridge Retirement System ("Plaintiff"), will move, before the Superior Court of New Jersey, Law Division, Somerset County (the Honorable Kevin M. Shanahan, A.J.S.C.), for entry of a Judgment approving the Settlement as fair, reasonable, and adequate and for entry of an Order approving the proposed Plan of Allocation as fair, reasonable, and adequate.

**PLEASE TAKE FURTHER NOTICE** that movant relies on the (1) the accompanying memorandum of law and (2) the Certification of Lauren A. Ormsbee in Support of (I) Plaintiff's Motion for Final Approval of Settlement and Plan of Allocation; and (II) Class Counsel's Motion for Attorneys' Fees and Litigation Expenses and its exhibits, which are enclosed herewith.

A proposed Judgment and Order granting the relief requested herein will be submitted in connection with Plaintiff's reply submission, which will be filed no later than August 8, 2022, pursuant to the Court's May 3, 2022 Order Preliminarily Approving Settlement and Providing for Notice.

Date: July 11, 2022

Respectfully submitted,

<u>/s Lauren A. Ormsbee</u> John C. Browne Lauren A. Ormsbee Abe Alexander **BERNSTEIN LITOWITZ BERGER** & GROSSMANN LLP 1251 Avenue of the Americas New York, NY 100120 Tel: (212) 554-1400 Fax: (212) 554-1444 johnb@blbglaw.com lauren@blbglaw.com abe.alexander@blbglaw.com

Counsel for Plaintiff Cambridge Retirement System and Interim Class Counsel /s James E. Cecchi

James E. Cecchi Donald A. Ecklund CARELLA, BYRNE, CECCHI, OLSTEIN, BRODY & AGNELLO, P.C. 5 Becker Farm Road Roseland, NJ 07068 Tel: (973) 994-1700

Fax: (973) 994-1744 JCecchi@carellabyrne.com DEcklund@carellabyrne.com

Liaison Counsel for Plaintiff Cambridge Retirement System

#3112337