

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, NY 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)

**REPLY MEMORANDUM OF LAW 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**

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Plaintiff Cambridge Retirement System (“Plaintiff”), on behalf of itself and the Settlement Class, and Class Counsel respectfully submit this reply memorandum of law in support of (i) Plaintiff’s unopposed motion for final approval of the Settlement and approval of the proposed Plan of Allocation, and (ii) Class Counsel’s unopposed motion for an award of attorneys’ fees and payment of Litigation Expenses, both filed on July 11, 2022 (together, the “Motions”).¹

I. INTRODUCTION

In Plaintiff’s and Class Counsel’s opening papers in support of the Motions, they set forth why the proposed \$25 million Settlement satisfies the criteria for final approval of a class action settlement. Likewise, Class Counsel set forth why their request for attorneys’ fees and Litigation Expenses should be approved.

Since then, the Claims Administrator, under the supervision of Class Counsel, completed an extensive notice program pursuant to the Court’s May 3, 2022 Order Preliminarily Approving Settlement and Providing for Notice (“Preliminary Approval Order”). The notice program included mailing the Notice Packet to over 85,500 potential Settlement Class Members. In response to this notice program, no Settlement Class Member has objected to any aspect of the Settlement, the Plan of Allocation, or Class Counsel’s motion for an award of attorneys’ fees. In addition, only two requests for exclusion from the Settlement Class have been received. The total number of shares of Amneal common stock purchased by the persons and entities requesting exclusion represents a tiny fraction of the number of Amneal’s outstanding common shares during the Class Period. As explained below, the overwhelmingly positive reaction of the Settlement

¹ Unless otherwise defined, all capitalized terms have the meanings set forth in the Stipulation and Agreement of Settlement, dated March 28, 2022, or in 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, filed July 11, 2022.

Class demonstrates that the proposed Settlement, the Plan of Allocation, and the request for attorneys' fees and Litigation Expenses should be approved.

II. THE SETTLEMENT, PLAN OF ALLOCATION, AND MOTION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES WARRANT THIS COURT'S APPROVAL

A. The Court-Approved Notice Program

Per the Court's Preliminary Approval Order, the Court-authorized Claims Administrator, JND Legal Administration ("JND"), conducted an extensive notice campaign, including mailing notice of the Settlement to 85,530 potential Settlement Class Members, publishing a summary notice in *Investor's Business Daily* and over the *PR Newswire*, and posting relevant information and documents—including Plaintiff's and Class Counsel's Opening Papers—on a dedicated settlement website, www.AmnealSecuritiesLitigation.com. See Supplemental Certification of Luiggy Segura Regarding: (A) Mailing of the Notice and Claim Form; and (B) Report on Requests for Exclusion Received ("Supp. Segura Cert.") attached as Exhibit A, as well as the filed Certification of Luiggy Segura dated July 11, 2022 ("Initial Segura Cert.").

The notice efforts have informed Settlement Class Members of the Settlement, the Plan of Allocation, and the requested fees and Litigation Expenses, as well as Settlement Class Members' options in connection with the Settlement and the July 25, 2022 deadline for submitting an objection or requesting exclusion from the Settlement Class. See, e.g., Initial Segura Cert., Ex. A.

Following this robust notice campaign, there have been no objections to any aspect of the Settlement, the Plan of Allocation, or the motion for attorneys' fees and expenses. In addition, only two requests for exclusion from the Settlement Class have been received. This represents a tiny fraction of the 85,530 Notices mailed to potential Settlement Class Members. See Supp. Segura Cert. ¶¶ 2, 4. In addition, the 6,800 shares of Amneal Common Stock reported to have

been purchased during the Settlement Class Period by the persons and entities requesting exclusion represents less than 0.005% of the over 140 million shares of Amneal Common Stock outstanding.

See Supp. Segura Cert. ¶ 4, and Exs. 1 and 2.²

B. The Settlement Class’s Reaction Supports Approval of the Settlement and Plan of Allocation

The reaction of class members to the proposed settlement is an important factor that Courts consider in determining whether to approve a class action settlement. See *Strougo v. Ocean Shore Holding Co.*, 457 N.J. Super. 138, 160 (Ch. Div. 2017) (“The reaction of the class to the settlement is perhaps the most significant factor to be weighed in considering its adequacy.”). Courts consider whether “the number of objectors, in proportion to the total class, indicates that the reaction of the class to the settlement is favorable.” *In re Schering-Plough Corp. Enhance Sec. Litig.*, 2013 WL 5505744, at *2 (D.N.J. Oct. 1, 2013); see also *In re Nat’l Football League Players Concussion Inj. Litig.*, 821 F.3d 410, 438 (3d. Cir. 2016) (this factor favored settlement where only approximately 1% of class members objected and approximately 1% of class members opted out).

The absence of any objections from Settlement Class Members strongly supports a finding that the Settlement is fair, reasonable, and adequate. See *Cerbo v. Ford of Englewood, Inc.*, 2006 WL 177586, at *15 (N.J. Super. Ct. Law Div. Jan. 26, 2006) (“Courts construe class members’ failure to object to proposed settlement terms as evidence that the settlement is fair and reasonable.”); *In re Cendant Corp. Litig.*, 264 F.3d 201, 235 (3d Cir. 2001) (“vast disparity between the number of potential class members who received notice of the Settlement and the number of objectors creates a strong presumption . . . in favor of the Settlement”); *Castro v. Sanofi Pasteur Inc.*, 2017 WL 4776626, at *4 n.3 (D.N.J. Oct. 23, 2017) (“the lack of objectors provides

² One of the two requests for exclusion did not provide any details on their trading in Amneal Common Stock.

a strong indication that the settlement is fair and reasonable”); *In re Lucent Techs., Inc., Sec. Litig.*, 307 F. Supp. 2d 633, 643 (D.N.J. 2004) (“[U]nanimous approval of the proposed settlement by the class members is entitled to nearly dispositive weight.”).

In particular, the absence of any objections from institutional investors, who possessed ample sophistication, means and incentive to object to the Settlement if they deemed it unsatisfactory, is further evidence of the Settlement’s fairness. *See, e.g., In re Facebook, Inc. IPO Sec. & Derivative Litig.*, 343 F. Supp. 3d 394, 410 (S.D.N.Y. 2018) (“That not one sophisticated institutional investor objected to the Proposed Settlement is indicia of its fairness.”); *In re AT&T Corp. Sec. Litig.*, 2005 WL 6716404, at *4 (D.N.J. Apr. 25, 2005) (the reaction of the class “weigh[ed] heavily in favor of approval” where “no objections were filed by any institutional investors who had great financial incentive to object”).

That only two requests for exclusion were received following extensive notice efforts—including the mailing of over 85,000 Notices—further supports approval of the Settlement. *See, e.g., Varacallo v. Mass. Mut. Life Ins. Co.*, 226 F.R.D. 207, 251 (D.N.J. 2005) (fact that only 0.06% of the class members opted out of the settlement favored approval of the settlement); *Destefano v. Zynga, Inc.*, 2016 WL 537946, at *14 (N.D. Cal. Feb. 11, 2016) (finding that a low number of exclusions supports the reasonableness of a class action settlement).

The lack of objections also supports approval of the proposed Plan of Allocation. *See, e.g., Lucent*, 307 F. Supp. 2d at 649 (“The favorable reaction of the Class supports approval of the proposed Plan of Allocation. . . . [N]o Class Member has objected to the Plan of Allocation.”); *In re AremisSoft Corp. Sec. Litig.*, 210 F.R.D. 109, 127 (D.N.J. 2002) (same); *In re Veeco Instruments Inc. Sec. Litig.*, 2007 WL 4115809, at *14 (S.D.N.Y. Nov. 7, 2007) (“not one class member has objected to the Plan of Allocation which was fully explained in the Notice of Settlement sent to all

Class Members. This favorable reaction of the Class supports approval of the Plan of Allocation.”).

C. The Settlement Class’s Reaction Also Supports Approval of Class Counsel’s Request for Attorneys’ Fees and Litigation Expenses

The reaction of the Settlement Class also supports Class Counsel’s motion for attorneys’ fees and Litigation Expenses. Here, the lack of any objection is strong evidence that the requested attorneys’ fees and expenses sought are reasonable. *See, e.g., In re AT&T Corp.*, 455 F.3d 160, 170 (3d Cir. 2006) (“the absence of substantial objections by class members to the fees requested by counsel strongly supports approval”); *Beneli v. BCA Fin. Servs., Inc.*, 2018 WL 734673, at *17 (D.N.J. Feb. 6, 2018) (the absence of objections “strongly supports approval of Class Counsel’s requested fee award”); *In re Diet Drugs (Phentermine/Fenfluramine/Dexfenfluramine) Prods. Liab. Litig.*, 2017 WL 2838257, at *3 (E.D. Pa. June 30, 2017) (“the absence of any objection is indicative of the fairness of the [fee] petition”).

Again, the absence of any objection to the fees by institutional investors is of particular note because they are sophisticated and have the capacity to submit an objection if they believed it warranted. *See In re Rite Aid Corp. Sec. Litig.*, 396 F.3d 294, 305 (3d Cir. 2005) (that “a significant number of investors in the class were ‘sophisticated’ institutional investors that had considerable financial incentive to object had they believed the requested fees were excessive” and did not do so, supported approval of request); *In re Schering-Plough Corp. Enhance ERISA Litig.*, 2012 WL 1964451, at *6 (D.N.J. May 31, 2012) (“The lack of objections to the requested attorneys’ fees supports the request, especially because the settlement class includes large, sophisticated institutional investors.”).

In sum, the favorable reaction of the Settlement Class supports approval of the Settlement, the Plan of Allocation, and Class Counsel’s request for attorneys’ fees and Litigation Expenses.

III. CONCLUSION

For all these reasons, and those set forth in their opening papers, Plaintiff and Class Counsel respectfully request that the Court approve the Settlement, the Plan of Allocation, and Class Counsel's motion for attorneys' fees and Litigation Expenses. Copies of the proposed (i) Judgment Approving Class Action Settlement; (ii) Order Approving Plan of Allocation of Net Settlement Fund, and (iii) Order Awarding Attorneys' Fees and Litigation Expenses, are attached as Exhibits B, C, and D.

Date: August 8, 2022

Respectfully submitted,

/s/ John C. Browne

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*

#3116720

Exhibit A

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)

**SUPPLEMENTAL CERTIFICATION OF LUIGGY SEGURA
REGARDING: (A) MAILING OF THE NOTICE AND CLAIM FORM;
AND (B) REPORT ON REQUESTS FOR EXCLUSION RECEIVED**

I, Luiggy Segura, of full age, hereby certify as follows:

1. I am the Vice President of Securities Operations at JND Legal Administration (“JND”). Pursuant to the Court’s Order Preliminarily Approving Settlement and Providing for Notice, dated May 3, 2022 (the “Preliminary Approval Order”), JND was authorized to act as the Claims Administrator in connection with the Settlement of the above-captioned action (the “Action”). I submit this certification as a supplement to my earlier submitted certification, the Certification of Luiggy Segura Regarding (A) Mailing of the Notice and Claim Form; (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion Received to Date, dated July 11, 2022 (“Initial Mailing Certification”).¹ The following statements are based

¹ Unless otherwise defined herein, all capitalized terms have the meanings set forth in the Stipulation and Agreement of Settlement, dated March 28, 2022 (the “Stipulation”) or the Initial Mailing Certification.

on my personal knowledge and information provided by other JND employees working under my supervision, and if called on to do so, I could and would testify competently thereto.

CONTINUED MAILING OF THE NOTICE PACKET

2. Since the execution of my Initial Mailing Certification JND has continued to disseminate copies of the Notice and Claim Form (together, the “Notice Packet”) in response to additional requests from potential Settlement Class Members and nominees. Through August 3, 2022, JND has mailed a total of 85,530 Notice Packets to potential Settlement Class Members and nominees.

TELEPHONE HELPLINE AND WEBSITE

3. JND continues to maintain the toll-free telephone number (1-866-615-0973) and interactive voice response system to accommodate any inquiries from potential members of the Settlement Class with questions about the Action and the Settlement. JND also continues to maintain the settlement website (www.AmnealSecuritiesLitigation.com) to assist members of the Class. On July 11, 2022, JND posted to the website copies of the papers filed in support of Plaintiff’s motion for final approval of the Settlement and Plan of Allocation and Class Counsel’s motion for attorneys’ fees and expenses. JND will continue maintaining and, as appropriate, updating the website and toll-free telephone number until the conclusion of the administration.

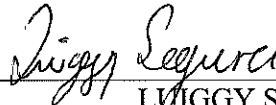
REPORT ON REQUESTS FOR EXCLUSION RECEIVED

4. The Notice informed potential members of the Settlement Class that requests for exclusion from the Class were to be mailed or otherwise delivered, addressed to Amneal Securities Litigation, EXCLUSIONS, c/o JND Legal Administration, P.O. Box 91234, Seattle, WA 98111, such that they were received by no later than July 25, 2022. JND has been monitoring all mail delivered to that post office box. JND has received two (2) requests for exclusion, both of which

were timely filed. The requests for exclusion are attached hereto as Exhibits 1 and 2. In the interests of privacy, the requests for exclusion have been redacted to remove the requestors' street addresses, telephone numbers, email addresses, and information on trading in securities other than Amneal Common Stock. Exhibit 3 hereto is a summary list of the names of the persons and entities who submitted the two requests for exclusion from the Settlement Class and their respective cities and states.

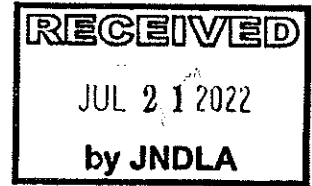
I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Executed this 4th day of August 2022, at New Hyde Park, NY.



LIGGY SEGURA

Exhibit 1



Dated: July 20th 2022

To: Amneal Securities Litigation, Exclusions, c/o JND Legal Administration,
Box 91234, Seattle, WA 98111.

From: Syed F. Haider

[REDACTED]
Livermore, Ca 94551

Subject: Request to Exclude form the Class Action against Amneal Pharmaceutical.
SOM-L-1701-19.

Dear Sir/Madam,

I, Syed F.Haider herein requesting and verifying that I would like to be excluded form the Settlement Class in Cambridge Retirement System v. Amneal Pharmaceuticals,Inc.SOM-L-1701-19 Superior Court of New Jersey (Somerset County, Law Division).

I Syed F. Haider request to be excluded form the Class Action against Amneal Pharmaceutical Inc., I request exclusion form the Settlement Class in Cambridge Retirement System v. Amneal Pharmaceuticals, Inc. SOM-L-1701-19.

My Address is as follows:

[REDACTED] Livermore, Ca 94551

Phone# [REDACTED].

Please Note Stocks of Amneal Pharmaceutical Purchased/acquired and/ sold during the Settlement Class Period is provided on separate pages and signed by me.

Syed F. Haider

[REDACTED]
Livermore, Ca 94551
[REDACTED]

Signed: SYED F. HAIDER.
7-15-2022.

Brokerage

Run Date,Action,Symbol,Security Description,Security Type,Quantity,Price
 (\$),Commission (\$),Fees (\$),Accrued Interest (\$),Amount (\$),Settlement Date
 08/13/2018, YOU SOLD AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX) (Cash), AMRX,
 AMNEAL PHARMACEUTICALS INC COM STK CL A,Cash,-900,21.42,,0.26,,19275.94,08/15/2018
 08/13/2018, YOU SOLD AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX) (Cash), AMRX,
 AMNEAL PHARMACEUTICALS INC COM STK CL
 A,Cash,-100,21.42,4.95,0.03,,2136.82,08/15/2018
 09/04/2018, YOU SOLD AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX) (Cash), AMRX,
 AMNEAL PHARMACEUTICALS INC COM STK CL A,Cash,-750,23.77,,0.24,,17827.26,09/06/2018
 09/04/2018, YOU SOLD AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX) (Cash), AMRX,
 AMNEAL PHARMACEUTICALS INC COM STK CL A,Cash,-700,23.77,,0.22,,16638.78,09/06/2018
 09/04/2018, YOU SOLD AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX) (Cash), AMRX,
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 09/11/2018, YOU BOUGHT AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX) (Cash), AMRX,
 AMNEAL PHARMACEUTICALS INC COM STK CL A,Cash,1000,22.96,4.95,,,-22961.35,09/13/2018

09/13/2018, YOU SOLD AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX) (Cash), AMRX,
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 AMNEAL PHARMACEUTICALS INC COM STK CL A,Cash,-100,23.56,,0.04,,2356.23,09/17/2018
 09/13/2018, YOU SOLD AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX) (Cash), AMRX,
 AMNEAL PHARMACEUTICALS INC COM STK CL A,Cash,-100,23.56,,0.04,,2356.23,09/17/2018
 09/13/2018, YOU SOLD AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX) (Cash), AMRX,
 AMNEAL PHARMACEUTICALS INC COM STK CL A,Cash,-100,23.56,,0.04,,2356.23,09/17/2018
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 AMNEAL PHARMACEUTICALS INC COM STK CL A,Cash,-100,23.56,,0.04,,2356.23,09/17/2018
 09/13/2018, YOU SOLD AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX) (Cash), AMRX,
 AMNEAL PHARMACEUTICALS INC COM STK CL
 A,Cash,-100,23.56,4.95,0.04,,2351.28,09/17/2018
 09/17/2018, YOU BOUGHT AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX) (Cash), AMRX,
 AMNEAL PHARMACEUTICALS INC COM STK CL A,Cash,1000,22.5,4.95,,,-22504.95,09/19/2018
 09/18/2018, YOU SOLD AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX) (Cash), AMRX,
 AMNEAL PHARMACEUTICALS INC COM STK CL A,Cash,-1900,23.5,,0.59,,44649.41,09/20/2018
 09/18/2018, YOU SOLD AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX) (Cash), AMRX,
 AMNEAL PHARMACEUTICALS INC COM STK CL A,Cash,-100,23.5,4.95,0.04,,2345.01,09/20/2018
 09/24/2018, YOU BOUGHT AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX) (Cash), AMRX,
 AMNEAL PHARMACEUTICALS INC COM STK CL A,Cash,300,23,4.95,,,-6904.95,09/26/2018
 09/25/2018, YOU BOUGHT AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX) (Cash), AMRX,
 AMNEAL PHARMACEUTICALS INC COM STK CL A,Cash,1200,22.83,4.95,,,-27400.95,09/27/2018
 09/26/2018, YOU BOUGHT AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX) (Cash), AMRX,
 AMNEAL PHARMACEUTICALS INC COM STK CL A,Cash,1000,22.1,4.95,,,-22099.95,09/28/2018

Signed: SYED F. HAIDER

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Signed: SYED F. HAIDER

Brokerage

Run Date	Action	Symbol	Security Description	Security Type	Quantity	Price (\$)	Commission (\$)	Fees (\$)	Accrued Interest (\$)	Amount (\$)	Settlement Date
09/26/2018	YOU BOUGHT	AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX)	(Cash)	AMRX							
		AMNEAL PHARMACEUTICALS INC COM STK CL A	Cash		1000	22.1	4.95			-22099.95	09/28/2018
10/05/2018	YOU BOUGHT	AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX)	(Cash)	AMRX							
		AMNEAL PHARMACEUTICALS INC COM STK CL A	Cash		500	20	4.95			-10004.95	10/10/2018
10/09/2018	YOU BOUGHT	AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX)	(Cash)	AMRX							
		AMNEAL PHARMACEUTICALS INC COM STK CL A	Cash		500	19.5	4.95			-9754.95	10/11/2018
10/17/2018	YOU BOUGHT	AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX)	(Cash)	AMRX							
		AMNEAL PHARMACEUTICALS INC COM STK CL A	Cash		300	17.42	4.95			-5232.39	10/19/2018
11/01/2018	YOU SOLD	AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX)	(Cash)	AMRX							
		AMNEAL PHARMACEUTICALS INC COM STK CL A	Cash		-300	19.21		0.08		5762.92	11/05/2018
11/01/2018	YOU SOLD	AMNEAL PHARMACEUTICALS INC COM STK CL A (AMRX)	(Cash)	AMRX							
		AMNEAL PHARMACEUTICALS INC COM STK CL A	Cash		-200	19.2	4.95	0.05		3835.2	11/05/2018

"The data and information in this spreadsheet is provided to you solely for your use and is not for distribution. The spreadsheet is provided for"

"informational purposes only, and is not intended to provide advice, nor should it be construed as an offer to sell, a solicitation of an offer to buy or a"

"recommendation for any security or insurance product by Fidelity or any third party. Data and information shown is based on information known to Fidelity as of the date it was"

"exported and is subject to change. It should not be used in place of your account statements or trade confirmations and is not intended for tax reporting"

"purposes. For more information on the data included in this spreadsheet, including

Signed: SYED F. HAIDER

any limitations thereof, go to Fidelity.com."

"Brokerage services are provided by Fidelity Brokerage Services LLC, 900 Salem Street, Smithfield, RI 02917. Custody and other services provided by National"

"Financial Services LLC. Both are Fidelity Investment companies and members SIPC, NYSE. Insurance products at Fidelity are distributed by"

"Fidelity Insurance Agency, Inc., and, for certain products, by Fidelity Brokerage Services, Member NYSE, SIPC."

"Date downloaded" 07/16/2022, 1:43 PM

Signed: SYED F. HAIDER.



OAKLAND CA 945

18 JUL 2022 PM 5 L

15
To,

AMNEAL SECURITIES LITIGATION, EXCLUSIONS, c/o
JND LEGAL ADMINISTRATION,
Box 91234, SEATTLE, WA 98111.

100-1-2022

POSTNET barcode

95065-1198



21VERMORE, EA 94551
925-408-2350

FROM: SVED F. HADDER

Exhibit 2

Received
JUL 14 2022
by JNDLA

July 11, 2022

Amneal Securities Litigation
EXCLUSIONS
c/o JND Legal Administration
P.O. Box 91234
Seattle, WA 98111

Exclusion Request for:

Michael Hardwick (died May 17, 2019)

[REDACTED]
Aiken, SC 29801

Patricia W. Hardwick (contact person)

[REDACTED]
Aiken, SC 29801
803-648-7536

Patricia W. Hardwick is Widow, Beneficiary and Executor of his Will.

On behalf of Michael Hardwick, I request exclusion from the Settlement Class in Cambridge Retirement System v. Amneal Pharmaceuticals, Inc., SOM-L-1701-19, Superior Court of New Jersey (Somerset County, Law Division).

I have zero information regarding any stock transactions made by Michael Hardwick. I have zero interest in any future settlement claim.

If needed, I can provide copies of a death certificate and court verification that I served as Executor of his Will.

Patricia W. Hardwick

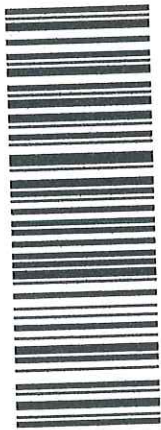
Patricia W. Hardwick

Patricia W. Hardwick

Aiken, SC 29801

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS; FOLD AT DOTTED LINE

CERTIFIED MAIL



7021 0950 0000 4296 1954

Amneal Securities Litigation
EXCLUSIONS
c/o IND Legal Administration
P.O. Box 91234
Seattle, WA 98111

9811139394

U.S. POSTAGE PAID
FCM LETTER
MONTMORENCI, SC
29829
JUL 11, 22
AMOUNT
\$7.85
R2305K132862-03



98111

1000



9811139394

9811139394

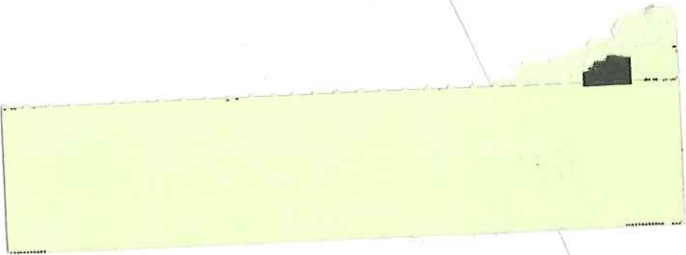


Exhibit 3

Exhibit 3

1. Syed F. Haider
Livermore, CA

2. Estate of Michael Hardwick
by Patricia W. Hardwick, Executor
Aiken, SC

Exhibit B

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)

[PROPOSED] JUDGMENT APPROVING CLASS ACTION SETTLEMENT

WHEREAS, a securities class action is pending in this Court entitled *Cambridge Retirement System v. Amneal Pharmaceuticals, Inc.*, SOM-L-1701-19 Sup. Ct. N.J., Superior Court of New Jersey (Somerset County, Law Division) (the “Action”);

WHEREAS, (a) Plaintiff Cambridge Retirement System (“Plaintiff”), on behalf of itself and the other members of the Settlement Class (defined below); and (b) defendants Amneal Pharmaceuticals, Inc. (“Amneal”), Amneal Pharmaceuticals Holdings, LLC (“Amneal Holdings”), and 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 (collectively, the “Individual Defendants” and, together with Amneal and Amneal Holdings, “Defendants”) have entered into a Stipulation and Agreement of Settlement dated March 28, 2022 (the “Stipulation”), that provides for a complete

dismissal with prejudice of the claims asserted in the Action on the terms and conditions set forth in the Stipulation, subject to the approval of this Court (the “Settlement”);

WHEREAS, unless otherwise defined in this Judgment, the capitalized terms herein shall have the same meaning as they have in the Stipulation;

WHEREAS, by Order dated May 3, 2022 (the “Preliminary Approval Order”), this Court: (a) preliminarily approved the Settlement subject to further consideration at the Settlement Hearing; (b) ordered that notice of the proposed Settlement be provided to potential Settlement Class Members; (c) provided Settlement Class Members with the opportunity either to exclude themselves from the Settlement Class or to object to the proposed Settlement; and (d) scheduled a hearing regarding final approval of the Settlement;

WHEREAS, due and adequate notice has been given to the Settlement Class;

WHEREAS, the Court conducted a hearing on August 15, 2022 (the “Settlement Hearing”) to consider, among other things, (a) whether the terms and conditions of the Settlement are fair, reasonable, and adequate to the Settlement Class and should therefore be approved; and (b) whether a judgment should be entered dismissing the Action with prejudice as against the Defendants; and

WHEREAS, the Court having reviewed and considered the Stipulation, all papers filed and proceedings held herein in connection with the Settlement, all oral and written comments received regarding the Settlement, and the record in the Action, and good cause appearing therefor;

IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

1. **Jurisdiction** – The Court has jurisdiction over the subject matter of the Action and all matters relating to the Settlement, as well as personal jurisdiction over all of the Parties and each of the Settlement Class Members.

2. **Incorporation of Settlement Documents** – This Judgment incorporates and makes a part hereof: (a) the Stipulation filed with the Court on April 1, 2022; and (b) the Notice and the Summary Notice, both of which were filed with the Court on July 11, 2022.

3. **Class Certification for Settlement Purposes** – The Court hereby certifies for the purposes of the Settlement only, the Action as a class action pursuant to New Jersey Court Rules 4:32-1(a) and (b)(3) on behalf of the Settlement Class consisting of all persons and entities who purchased or otherwise acquired Amneal Common Stock issued in connection with the business combination between Legacy Amneal and Impax pursuant or traceable to, or registered in the Registration Statement, during the Settlement Class Period, and were damaged thereby (the “Settlement Class”). Excluded from the Settlement Class are: (i) Defendants; (ii) Officers, directors, and affiliates of Amneal, Amneal Holdings, Legacy Amneal, or Impax, currently or during the Settlement Class Period; (iii) members of the Immediate Families of any individual included in (i) or (ii); (iv) any entity in which any Defendant has or had a controlling interest; and (v) the legal representatives, heirs, successors, or assigns of any person or entity included in (i), (ii) or (iii). Also excluded from the Settlement Class are any persons or entities listed on Exhibit 1 hereto who or which are excluded from the Settlement Class pursuant to request.

4. **Settlement Class Findings** – For purposes of the Settlement only, the Court finds that each element required for certification of the Settlement Class pursuant to New Jersey Court Rules 4:32-1(a) and (b)(3) has been met: (a) the members of the Settlement Class are so numerous

that their joinder in the Action would be impracticable; (b) there are questions of law and fact common to the Settlement Class which predominate over any individual questions; (c) the claims of Plaintiff in the Action are typical of the claims of the Settlement Class; (d) Plaintiff and Class Counsel have and will fairly and adequately represent and protect the interests of the Settlement Class; and (e) a class action is superior to other available methods for the fair and efficient adjudication of the Action.

5. **Adequacy of Representation** – Pursuant to New Jersey Court Rule 4:32, and for the purposes of the Settlement only, the Court hereby appoints Plaintiff as Class Representative for the Settlement Class and appoints Bernstein Litowitz Berger & Grossmann LLP as Class Counsel for the Settlement Class. Plaintiff and Class Counsel have fairly and adequately represented the Settlement Class both in terms of litigating the Action and for purposes of entering into and implementing the Settlement and have satisfied the requirements of New Jersey Court Rules 4:32-1(a)(4) and 4:32-2(g), respectively.

6. **Notice** – The Court finds that the dissemination of the Notice and the publication of the Summary Notice: (a) were implemented in accordance with the Preliminary Approval Order; (b) constituted the best notice practicable under the circumstances; (c) constituted notice that was reasonably calculated, under the circumstances, to apprise Settlement Class Members of (i) the pendency of the Action; (ii) the effect of the proposed Settlement (including the Releases to be provided thereunder); (iii) Class Counsel’s motion for attorneys’ fees and reimbursement of expenses; (iv) their right to object to any aspect of the Settlement, the Plan of Allocation, and/or Class Counsel’s motion for attorneys’ fees and reimbursement of expenses; (v) their right to exclude themselves from the Settlement Class; and (vi) their right to appear at the Settlement Hearing; (d) constituted due, adequate, and sufficient notice to all persons and entities entitled to

receive notice of the proposed Settlement; and (e) satisfied the requirements of New Jersey Court Rules 4:32-2(b)(2) and 4:32-2(e)(1)(A) and due process, and all other applicable laws and rules.

7. **Objections** – No objections to approval of the Settlement have been submitted by Settlement Class Members or any other persons.

8. **Final Settlement Approval and Dismissal of Claims** – Pursuant to, and in accordance with, New Jersey Court Rule 4:32-2(e), this Court hereby fully and finally approves the Settlement set forth in the Stipulation in all respects (including, without limitation, the amount of the Settlement, the Releases provided for therein, and the dismissal with prejudice of the claims asserted against Defendants in the Action), and finds that the Settlement is, in all respects, fair, reasonable and adequate. Specifically, the Court finds that (a) Plaintiff and Class Counsel have adequately represented the Settlement Class; (b) the Settlement was negotiated by the Parties at arm's length; (c) the relief provided for the Settlement Class under the Settlement is adequate taking into account the costs, risks, and delay of trial and appeal, the proposed means of distributing the Settlement Fund to the Settlement Class, and the proposed attorneys' fee award; and (d) the Settlement treats members of the Settlement Class equitably relative to each other. The Parties are directed to implement, perform, and consummate the Settlement in accordance with the terms and provisions contained in the Stipulation.

9. The Action and all of the claims asserted against Defendants in the Action by Plaintiff and the other Settlement Class Members are hereby dismissed with prejudice as to all Defendants. The Parties shall bear their own costs and expenses, except as otherwise expressly provided in the Stipulation.

10. **Binding Effect** – The terms of the Stipulation and of this Judgment shall be forever binding on Defendants, Plaintiff, and all other Settlement Class Members (regardless of whether

or not any individual Settlement Class Member submits a Claim Form or seeks or obtains a distribution from the Net Settlement Fund), as well as their respective successors and assigns, including any and all Releasees and any corporation, partnership, or other entity into or with which any Party hereto may merge, consolidate, or reorganize. The persons and entities listed on Exhibit 1 hereto are excluded from the Settlement Class pursuant to request and are not bound by the terms of the Stipulation or this Judgment.

11. **Releases** – The Releases set forth in paragraphs 6 and 7 of the Stipulation, together with the definitions contained in paragraph 1 of the Stipulation relating thereto, are expressly incorporated herein in all respects. The Releases are effective as of the Effective Date. Accordingly, this Court orders that:

(a) Without further action by anyone, and subject to paragraph 12 below, upon the Effective Date of the Settlement, Plaintiff and each of the other Settlement Class Members, on behalf of themselves and their respective heirs, executors, administrators, predecessors, successors, and assigns, in their capacities as such: (i) have, shall be deemed to have, and by operation of law and of this Judgment shall have, fully, finally, and forever compromised, settled, released, resolved, relinquished, waived, and discharged each and every Released Plaintiff's Claim against Defendants and the other Defendants' Releasees; (ii) have and shall be deemed to have covenanted not to sue, directly or indirectly, any of the Defendants' Releasees with respect to any or all of the Released Plaintiff's Claims; and (iii) shall forever be barred and enjoined from directly or indirectly prosecuting filing, commencing, instituting, maintaining, or intervening in any action, suit, cause of action, arbitration, claim demand, or other proceeding in any jurisdiction, on their own behalf or in a representative capacity, that is based upon or arises out of any or all of the Released Plaintiff's Claims against any of the Defendants and the other Defendants' Releasees.

(b) Without further action by anyone, and subject to paragraph 12 below, upon the Effective Date of the Settlement, Defendants, on behalf of themselves, and each of their respective heirs, executors, administrators, predecessors, successors, and assigns, in their capacities as such, shall be deemed to have, and by operation of law and of this Judgment shall have, fully, finally, and forever compromised, settled, released, resolved, relinquished, waived, and discharged each and every Released Defendants' Claim against Plaintiff and the other Plaintiff's Releasees. This Release shall not apply to any person or entity listed on Exhibit 1 hereto.

12. Notwithstanding paragraphs 11(a) – (b) above, nothing in this Judgment shall bar any action by any of the Parties to enforce or effectuate the terms of the Stipulation or this Judgment.

13. **No Admissions** – Neither this Judgment, the Term Sheet, the Stipulation, including the exhibits thereto and the Plan of Allocation contained therein (or any other plan of allocation that may be approved by the Court), the negotiations leading to the execution of the Term Sheet and the Stipulation, nor any proceedings taken pursuant to or in connection with the Term Sheet, the Stipulation, and/or the approval of the Settlement (including any arguments proffered in connection therewith):

(a) shall be offered against any of the Defendants' Releasees as evidence of, or construed as, or deemed to be evidence of any presumption, concession, or admission by any of the Defendants' Releasees with respect to the truth of any fact alleged by Plaintiff or the validity of any claim that was or could have been asserted or the deficiency of any defense that has been or could have been asserted in this Action or in any other litigation, or of any liability, negligence, fault, or other wrongdoing of any kind of any of the

Defendants' Releasees, in any arbitration proceeding or other civil, criminal, or administrative action or proceeding, other than such proceedings as may be necessary to effectuate the provisions of the Stipulation;

(b) shall be offered against any of the Plaintiff's Releasees, as evidence of, or construed as, or deemed to be evidence of any presumption, concession, or admission by any of the Plaintiff's Releasees that any of their claims are without merit, that any of the Defendants' Releasees had meritorious defenses, or that damages recoverable under the Complaint would not have exceeded the Settlement Amount or with respect to any liability, negligence, fault, or wrongdoing of any kind, or in any way referred to for any other reason as against any of the Plaintiff's Releasees, in any arbitration proceeding or other civil, criminal, or administrative action or proceeding, other than such proceedings as may be necessary to effectuate the provisions of the Stipulation; or

(c) shall be construed against any of the Releasees as an admission, concession, or presumption that the consideration to be given hereunder represents the amount which could be or would have been recovered after trial;

provided, however, that the Parties and the Releasees and their respective counsel may refer to this Judgment and the Stipulation to effectuate the protections from liability granted hereunder and thereunder or otherwise to enforce the terms of the Settlement.

14. **Retention of Jurisdiction** – Without affecting the finality of this Judgment in any way, this Court retains continuing and exclusive jurisdiction over: (a) the Parties for purposes of the administration, interpretation, implementation, and enforcement of the Settlement; (b) the disposition of the Settlement Fund; (c) any motion for attorneys' fees and/or expenses by Class Counsel in the Action that will be paid from the Settlement Fund; (d) any motion to approve the

Plan of Allocation; (e) any motion to approve the Class Distribution Order; and (f) the Settlement Class Members for all matters relating to the Action.

15. Separate orders shall be entered regarding approval of a plan of allocation and the motion of Class Counsel for attorneys' fees and reimbursement of expenses. Such orders shall in no way affect or delay the finality of this Judgment and shall not affect or delay the Effective Date of the Settlement.

16. **Modification of the Agreement of Settlement** – Without further approval from the Court, Plaintiff and Defendants are hereby authorized to agree to and adopt such amendments or modifications of the Stipulation or any exhibits attached thereto to effectuate the Settlement that: (a) are not materially inconsistent with this Judgment; and (b) do not materially limit the rights of Settlement Class Members in connection with the Settlement. Without further order of the Court, Plaintiff and Defendants may agree to reasonable extensions of time to carry out any provisions of the Settlement.

17. **Termination of Settlement** – If the Settlement is terminated as provided in the Stipulation or the Effective Date of the Settlement otherwise fails to occur, this Judgment shall be vacated, rendered null and void, and be of no further force and effect, except as otherwise provided by the Stipulation, and this Judgment shall be without prejudice to the rights of Plaintiff, the other Settlement Class Members, and Defendants, and the Parties shall revert to their respective positions in the Action as of immediately prior to the execution of the Term Sheet on February 7, 2022.

18. **Entry of Final Judgment** – There is no just reason to delay the entry of this Judgment as a final judgment in this Action. Accordingly, the Clerk of the Court is expressly directed to immediately enter this final judgment in this Action.

SO ORDERED this _____ day of _____ 2022.

The Honorable Kevin M. Shanahan, A.J.S.C.

Exhibit 1

1. Syed F. Haider
Livermore, CA
2. Estate of Michael Hardwick
by Patricia W. Hardwick, Executor
Aiken, SC

Exhibit C

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)

**[PROPOSED] ORDER APPROVING
PLAN OF ALLOCATION OF NET SETTLEMENT FUND**

This matter came on for hearing on August 15, 2022 (the “Settlement Hearing”) on Plaintiff’s motion to approve the proposed plan of allocation (“Plan of Allocation”) of the Net Settlement Fund created under the Settlement in the above-captioned class action (the “Action”). The Court having considered all matters submitted to it at the Settlement Hearing and otherwise; and it appearing that Notice of the Settlement Hearing (which included a summary of the Settlement as well as the full text of the proposed Plan of Allocation) (the “Notice”) substantially in the form approved by the Court was mailed to all Settlement Class Members who or which could be identified with reasonable effort, and that a summary notice of the hearing substantially in the form approved by the Court was published in *Investor’s Business Daily* and released over

PR Newswire pursuant to the specifications of the Court; and the Court having considered and determined the fairness and reasonableness of the proposed Plan of Allocation,

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. This Order approving the proposed Plan of Allocation incorporates by reference the definitions in the Stipulation and Agreement of Settlement dated March 28, 2022 (the “Stipulation”) and all terms not otherwise defined herein shall have the same meanings as set forth in the Stipulation.

2. The Court has jurisdiction to enter this Order approving the proposed Plan of Allocation, and over the subject matter of the Action and all Parties to the Action, including all Settlement Class Members.

3. Notice of Plaintiff’s motion for approval of the proposed Plan of Allocation was given to all Settlement Class Members who or which could be identified with reasonable effort. The form and method of notifying the Settlement Class of the motion for approval of the proposed Plan of Allocation satisfied the requirements of New Jersey Court Rule 4:32, due process, and all other applicable law and rules, constituted the best notice practicable under the circumstances, and constituted due and sufficient notice to all persons and entities entitled thereto.

4. Copies of the Notice, which included the Plan of Allocation, were mailed to over 85,500 potential Settlement Class Members and nominees, and no objections to the Plan of Allocation have been received.

5. The Court hereby finds and concludes that the formula for the calculation of the claims of Claimants as set forth in the Plan of Allocation mailed to Settlement Class Members provides a fair and reasonable basis upon which to allocate the proceeds of the Net Settlement Fund among Settlement Class Members with due consideration having been given to

administrative convenience and necessity.

6. The Court hereby finds and concludes that the Plan of Allocation is, in all respects, fair and reasonable to the Settlement Class. Accordingly, the Court hereby approves the Plan of Allocation proposed by Plaintiff.

7. Any appeal or any challenge affecting this Order approving the Plan of Allocation shall in no way disturb or affect the finality of the Judgment.

8. There is no just reason for delay in the entry of this Order, and immediate entry by the Clerk of the Court is expressly directed.

SO ORDERED this _____ day of _____, 2022.

The Honorable Kevin M. Shanahan, A.J.S.C.

Exhibit D

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)

**[PROPOSED] ORDER AWARDING
ATTORNEYS' FEES AND LITIGATION EXPENSES**

This matter came on for hearing on August 15, 2022 (the "Settlement Hearing") on Class Counsel's motion for an award of attorneys' fees and Litigation Expenses. The Court having considered all matters submitted to it at the Settlement Hearing and otherwise; and it appearing that Notice of the Settlement Hearing substantially in the form approved by the Court was mailed to all Settlement Class Members who or which could be identified with reasonable effort, and that a summary notice of the hearing substantially in the form approved by the Court was published in *Investor's Business Daily* and released over *PR Newswire* pursuant to the specifications of the Court; and the Court having considered and determined the fairness and reasonableness of the award of attorneys' fees and Litigation Expenses requested,

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. This Order incorporates by reference the definitions in the Stipulation and Agreement of Settlement dated March 28, 2022 (the “Stipulation”) and all terms not otherwise defined herein shall have the same meanings as set forth in the Stipulation.

2. The Court has jurisdiction to enter this Order and over the subject matter of the Action and all Parties to the Action, including all Settlement Class Members.

3. Notice of Class Counsel’s motion for attorneys’ fees and Litigation Expenses was given to all Settlement Class Members who or which could be identified with reasonable effort. The form and method of notifying the Settlement Class of the motion for attorneys’ fees and Litigation Expenses satisfied the requirements of New Jersey Court Rule 4:32, due process, and all other applicable law and rules, constituted the best notice practicable under the circumstances, and constituted due and sufficient notice to all persons and entities entitled thereto.

4. Plaintiff’s Counsel are hereby awarded attorneys’ fees in the amount of 28% of the Settlement Fund or \$7,000,000 (plus interest on that amount at the same rate as earned by the Settlement Fund), as well as \$537,761.22 in payment of Plaintiff’s Counsel’s litigation expenses (which fees and expenses shall be paid from the Settlement Fund), which sums the Court finds to be fair and reasonable. Class Counsel shall allocate the attorneys’ fees awarded amongst Plaintiffs’ Counsel in a manner which it, in good faith, believes reflects the contributions of such counsel to the institution, prosecution, and settlement of the Action.

5. In making this award of attorneys’ fees and payment of expenses from the Settlement Fund, the Court has considered and found that:

A. The Settlement has created a fund of \$25,000,000 in cash that has been funded into escrow pursuant to the terms of the Stipulation, and that numerous Settlement Class Members who submit acceptable Claim Forms will benefit from the Settlement that occurred because of the efforts of Plaintiff's Counsel;

B. The requested fee has been reviewed and approved as reasonable by Plaintiff, a sophisticated institutional investor that actively supervised the Action;

C. Copies of the Notice were mailed to over 85,500 potential Settlement Class Members and nominees stating that Class Counsel would apply for attorneys' fees in an amount not to exceed 28% of the Settlement Fund and for Litigation Expenses in an amount not to exceed \$650,000, and no objections to the requested attorneys' fees and Litigation Expenses were received;

D. Plaintiff's Counsel conducted the litigation and achieved the Settlement with skill, perseverance, and diligent advocacy;

E. The Action raised a number of complex issues;

F. Had Plaintiff's Counsel not achieved the Settlement there would remain a significant risk that Plaintiff and the other members of the Settlement Class may have recovered less or nothing from Defendants;

G. Plaintiff's Counsel devoted over 18,800 hours, with a lodestar value of over \$9,872,000, to achieve the Settlement; and

H. The amount of attorneys' fees awarded and expenses to be paid from the Settlement Fund are fair and reasonable and consistent with awards in similar cases.

6. Plaintiff Cambridge Retirement System is hereby awarded \$4,339.26 from the Settlement Fund as a service award in reimbursement for its reasonable costs and expenses directly related to its representation of the Settlement Class.

7. Any appeal or any challenge affecting this Court's approval regarding any attorneys' fees and expense application shall in no way disturb or affect the finality of the Judgment.

8. Exclusive jurisdiction is hereby retained over the Parties and the Settlement Class Members for all matters relating to this Action, including the administration, interpretation, effectuation or enforcement of the Stipulation and this Order.

9. In the event that the Settlement is terminated or the Effective Date of the Settlement otherwise fails to occur, this Order shall be rendered null and void to the extent provided by the Stipulation.

10. There is no just reason for delay in the entry of this Order, and immediate entry by the Clerk of the Court is expressly directed.

SO ORDERED this _____ day of _____, 2022.

The Honorable Kevin M. Shanahan, A.J.S.C.