

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MYLAN PHARMACEUTICALS, INC., <i>et al.</i> ,	:	Master Docket No. 2:12-cv-03824-PD
	:	Consolidated
Plaintiffs,	:	
	:	Civ. No. 12-3824
v.	:	Indirect Purchaser Action
	:	
WARNER CHILCOTT PUBLIC LIMITED	:	
COMPANY, <i>et al.</i> ,	:	
	:	
Defendants.	:	

**INDIRECT PURCHASER PLAINTIFFS’ NOTICE OF MOTION AND MOTION FOR:
(1) FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND PLAN OF
ALLOCATION; AND (2) AWARD OF ATTORNEYS’ FEES, REIMBURSEMENT OF
EXPENSES, AND PAYMENT OF INCENTIVE AWARDS TO NAMED PLAINTIFFS**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

PLEASE TAKE NOTICE that on January 7, 2015, at 10:00 a.m. in Courtroom 6B at the United States District Court for the Eastern District of Pennsylvania, James A. Byrne U.S. Courthouse, 601 Market Street, Philadelphia, PA 19106, Plaintiffs International Brotherhood of Electrical Workers 38, Health and Welfare Fund, International Union of Operating Engineers Local 132, Health and Welfare Fund, and Laborers Health and Welfare Trust Fund for Northern California (collectively, “Named Plaintiffs”) will, and hereby do, move the Court, pursuant to the Court’s Order dated September 4, 2014 (ECF No. 663), for an order:

- (a) granting final approval of the Settlement;
- (b) approving the Plan of Allocation;
- (c) finally certifying the Settlement Class;
- (d) awarding attorneys’ fees and reimbursement of expenses to Class Counsel;
- (e) approving service awards to the Named Plaintiffs; and

(f) entering judgment terminating this litigation.¹

Named Plaintiffs' motions are based on the concurrently filed Memorandum of Law in Support of Motion for Final Approval of Class Action Settlement and Plan of Allocation; Memorandum of Law in Support of Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Payment of Incentive Awards to Named Plaintiffs; the Declaration of Walter W. Noss in support thereof; the declarations of each of the Named Plaintiffs and their counsel; all other pleadings and matters of record; and such additional evidence or argument as may be presented at the hearing.

DATED: November 7, 2014

Respectfully submitted,
SCOTT+SCOTT, ATTORNEYS AT LAW, LLP

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¹ Unless otherwise defined herein, all capitalized terms have the meaning ascribed to them in the Settlement Agreement dated July 11, 2014. ECF No. 657-3.

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Fund and the Proposed Indirect Purchaser Classes,
International Union of Operating Engineers Local
132 Health and Welfare Fund, and Laborers Health
and Welfare Trust Fund for Northern California*

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2014, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List.

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