

Third Party Payor Class Action Summary Notice

If you are an entity who paid any amount of money for generic Valsartan, Valsartan HCTZ, Amlodipine Valsartan or Amlodipine Valsartan HCTZ, a class action lawsuit could affect your rights.

A class action lawsuit called *In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation*, Case No. 1:19-md-02875-RBK-SAK (the "Lawsuit") is currently pending in the United States District Court for the District of New Jersey ("the Court"). The Lawsuit alleges that Defendants (a complete list of these Defendants is available at the Case Website, www.TPP.ValsartanMedicationLawsuit.com) violated state laws by manufacturing, distributing, producing, and/or selling Valsartan or Valsartan-Containing Drugs ("VCDs") that were contaminated with probable human carcinogens in the form of nitrosamines, N-nitrosodimethylamine ("NDMA") and N-nitrosodiethylamine ("NDEA"). The Defendants have denied any wrongdoing, have denied that the amounts of NDMA and NDEA in the Valsartan and VCDs at issue were or could be carcinogenic, and have asserted various legal and factual defenses to the claims asserted on behalf of the Class.

The Court has not decided whether the Defendants did anything wrong or whether the Plaintiffs' claims have merit. However, the Court has certified a Third Party Payor ("TPP") Class and various Subclasses of which you may be a member unless you exclude yourself from the Lawsuit. If you qualify as a member of the TPP Class, you have the right to participate as a class member or to opt out. Certain exceptions apply.

The Lawsuit is ongoing. You may visit the Case Website to **register for case updates** regarding the Lawsuit and any potential recovery or benefits to class members. **This will help us contact you in the event of any future settlement or judgment.** This Notice does not include or affect any personal injury claims.

A federal court directed that this Notice be provided to you.

Who is Included?

The TPP Class is generally defined as:

All Third Party Payors that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in the United States and its territories and possessions for a VCD that was manufactured by any Active Pharmaceutical Ingredient or Finished Dose Defendant, and distributed or sold in the United States by any Active Pharmaceutical Ingredient, Finished Dose, or Wholesaler Defendant.

Detailed information regarding the exact Class and Subclasses are viewable on the Case Website.

What Are My Rights And Options?

Do Nothing: If you do nothing, you will remain a part of the Class and Lawsuit and you will be bound by any future judgment(s) of the Court.

Opt-Out: All entities that satisfy the definition of the TPP Class will be automatically included in the Class unless they choose to opt-out from the Class and Lawsuit entirely. To opt-out, you must submit an exclusion request to the Class Administrator by email (info@ValsartanMedicationLawsuit.com) or mail to

Valsartan Class Administrator, ATTN: Exclusion Request, PO Box 3376, Baton Rouge, LA 70821, **postmarked or emailed and received no later than January 31, 2024**. This date may change, check the Case Website for updates. This is the only option that allows you to pursue your own claims against one or more Defendants for the legal claims made in the Lawsuit. Choosing this option means you will not be bound by any future determination made in the Lawsuit; however, you will also not be eligible for any payments or other benefits, if any, that are awarded to the Class by the Court.

Complete details about how to opt-out from the Class and Lawsuit are available on the Case Website www.TPP.ValsartanMedicationLawsuit.com.

Do I have a lawyer in this case? Yes, if you do not exclude yourself by opting out. The Court has appointed Jorge Mestre of Rivero Mestre LLP and Gregory Hansel of Preti Flaherty Beliveau & Pachios Chartered LLP to represent the TPP Class.

Where can I get more information? This is only a summary of the Lawsuit, your legal rights and options. If you have questions, want to view the detailed notice or other documents, or register to receive updates regarding this Lawsuit, visit www.TPP.ValsartanMedicationLawsuit.com. You may also call 1-866-875-9644.

PLEASE DO NOT WRITE OR CALL THE COURT OR THE CLERK'S OFFICE FOR INFORMATION.

www.TPP.ValsartanMedicationLawsuit.com

1-866-875-9644