

**IN THE COURT OF COMMON PLEAS OF
ALLEGHENY COUNTY, PENNSYLVANIA**

RAJESH PATEL, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

VIATRIS INC., PFIZER INC.,
MICHAEL GOETTLER,
SANJEEV NARULA, BRYAN SUPRAN,
MARGARET M. MADDEN,
DOUGLAS E. GIORDANO,
ROBERT J. COURY, IAN READ, and
JAMES KILTS,

Defendants.

) CIVIL DIVISION
) No. GD-21-13314
)

) **LEAD PLAINTIFF'S MOTION FOR
) FINAL APPROVAL OF CLASS ACTION
) SETTLEMENT AND PLAN OF
) ALLOCATION**

) CLASS ACTION

) Filed on behalf of:

PLAINTIFF RAJESH PATEL

Counsel of Record for Plaintiff:

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[Additional counsel appear on signature page]

1. Pursuant to Pa. R. Civ. P. 1714(a), Lead Plaintiff Rajesh Patel (“Lead Plaintiff”), on behalf of himself and all other members of the Settlement Class, hereby moves for entry of the proposed Order and Final Judgment, which will: (i) grant final approval to the proposed settlement of the above-captioned class action, as set forth in the Stipulation and Agreement of Settlement, dated January 18, 2024 (the “Stipulation”);¹ and (ii) approve the proposed plan of allocation for distributing the proceeds of the Settlement to eligible claimants.

2. Lead Plaintiff will also move, pursuant to Pa. R. Civ. P. 1702, 1708, and 1709, for final certification of the Settlement Class.

3. The Court has scheduled a hearing on the motion for June 12, 2024 at 1:00 p.m. at 816 City County Building, Pittsburgh, PA 15219.

4. The motion is supported by the accompanying memorandum of law and the Declaration of Max R. Schwartz in Support of (I) Lead Plaintiff’s Motion for Final Approval of Class Action Settlement and Plan of Allocation, (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Payment of Expenses, and (III) Lead Plaintiff’s Request for a Service Award, with annexed exhibits, filed herewith.

5. Members of the Settlement Class have until May 22, 2024 to object to the requested relief.

Dated: May 8, 2024

Respectfully submitted,

LYNCH CARPENTER LLP

/s Kelly K. Iverson

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¹ All capitalized terms not otherwise defined herein have the same meanings as set forth in the Stipulation.

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Additional Counsel for Plaintiff

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