

Consumer Economic Loss and Medical Monitoring Class Action Notice

If you are an individual who consumed, and/or 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 Federal Court authorized this notice. This is not a solicitation from a lawyer.

- The purpose of this notice is to alert you about a class action lawsuit, *In Re: Valsartan, Losartan, and Irbesartan Products Liability Litigation*, Case No. 1:19-md-02875 (the “Lawsuit”) brought by individuals and entities who consumed and/or purchased Valsartan or Valsartan-Containing Drugs (“VCDs”) that were manufactured, distributed, sold and/or dispensed by the Defendants listed below. This notice informs you of your legal rights and options.
- The Lawsuit asserts the Defendants violated state law by manufacturing, distributing, producing, selling and/or dispensing Valsartan or VCDs that were contaminated with probable human carcinogens in the form of nitrosamines, N-nitrosodimethylamine (“NDMA”) and N-nitrosodiethylamine (“NDEA”). 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 assert various legal and factual defenses. The Court has not yet decided whether Plaintiffs’ claims have merit.
- **REGISTER FOR UPDATES:** You may visit the Case Website to sign up to receive updates regarding the litigation and any potential future recovery or benefits by economic loss or medical monitoring class members. Separate notice will be provided with regard to any settlement that is reached and preliminarily approved by the Court, and by signing up at the Case Website and updating your contact information, we can ensure that you receive that notice.
- This portion of the Lawsuit only includes class action claims for economic losses and medical monitoring.
- This Notice does not include or affect any personal injury claims.
- This Notice does not include any claims related to Losartan or Irbesartan.
- Your legal rights are affected regardless of whether you act or do not act. Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT		DEADLINE
DO NOTHING	If you do nothing, you will remain a part of the Class(es) and Lawsuit and you will be bound by any future judgment(s) of the Court.	NO DEADLINE
EXCLUDE YOURSELF FROM THE CLASSES AND LAWSUIT	If you take the steps required to exclude yourself from the Classes and Lawsuit, you will not be bound by any future determinations made in the Lawsuit, including any judgments at trial; however, you will also not be eligible for payments or other benefits, if any, that are awarded to any of the Classes by the Court. This is the only option that allows	JANUARY 31, 2024

	you to pursue your own claims against the Defendants for the legal claims made in this Lawsuit. See questions 12 and 13 for more information.	
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- These rights and options – and the deadlines to exercise them – are explained in this Notice.
- The Court in charge of this case has not decided in favor of the Plaintiffs or the Defendants.

CLASS DEFINITIONS

The Court has determined that the Lawsuit can proceed as a class action and has certified a number of detailed Classes and Subclasses by claim, defendant, and groupings of states. Below are summary class definitions authorized by the Court for the express purpose of providing this Notice. Please note that there are certain exclusions from the below summary class definitions. More detailed information regarding the various Classes and Subclasses certified by the Court may be viewed on the Case Website www.ValsartanMedicationLawsuit.com. The website will help you determine whether or not you are a class member, and if so, for which Classes and Subclasses.

Included in this Notice

Consumer Economic Loss Class	All individuals in the United States and its territories and possessions who, since at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money for a VCD (intended for personal or household use) that was manufactured by any Active Pharmaceutical Ingredient or Finished Dose Defendant, and distributed or sold in the United States by any Defendant. The detailed economic loss Class and Subclass definitions are attached hereto as Exhibit A.
Medical Monitoring Class	Individuals residing in the United States and its territories and possessions (except Mississippi, New Hampshire, North Carolina, and North Dakota) who consumed a sufficiently high Lifetime Cumulative Threshold (“LCT”) of NDMA or NDEA in generic VCDs manufactured by any Active Pharmaceutical Ingredient or Finished Dose Defendant, and marketed in the United States and its territories and possessions, at least since January 1, 2012. The detailed medical monitoring class and subclass definitions are attached hereto as Exhibit B.

Questions? Call 1-866-875-9644 or visit www.ValsartanMedicationLawsuit.com

BASIC INFORMATION

1. What is this Notice about?

A federal court directed that this Notice be provided to you because you have a right to know about this class action Lawsuit and about all of your rights and options. The Court also authorized and required the manner by which you received this Notice, and specifically required notice to be provided by email or text message, where available, or U.S. mail in certain limited circumstances. This Notice explains the Classes that have been certified, the Lawsuit, your legal rights, what benefits are available, who is eligible for them, and how to get them.

The Court presiding over this case is the United States District Court for the District of New Jersey. The Honorable Robert B. Kugler (“the Court”) is overseeing the class actions in the Lawsuit as part of a Multi-District Litigation (“MDL”) called *In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation*, Case No. 1:19-md-02875-RBK-SAK. The people and entities that filed the Lawsuit are called the “Plaintiffs” and the companies they sued are called the “Defendants.” This part of the Lawsuit relates only to Valsartan, and does not involve Losartan or Irbesartan.

2. What is the Lawsuit about?

The Lawsuit alleges the Defendants violated state laws by manufacturing, distributing, selling and/or dispensing Valsartan or VCDs that were contaminated with probable human carcinogens in the form of nitrosamines, NDMA and NDEA. Defendants deny all allegations of fault, wrongdoing, or liability made in the Lawsuit, 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.

3. What is a class action?

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals are known as “Class Representatives” or “Plaintiffs.” Together, the people included in the class action are called a “class” or “class members.” One court resolves a class action lawsuit for all class members, except for those who opt out of the class and litigation. The Plaintiffs and the Defendants are the Parties (the “Parties”) in the Litigation. The names of the individual Plaintiffs are listed in question 18 and the Defendants for the Consumer Economic Loss Classes and the Medical Monitoring Classes are listed in question 5.

4. Is there money available?

No money or other benefits are available now because the Court has not decided the merits of the Plaintiffs’ claims or whether the Defendants have valid defenses to those claims, and the Parties have not reached any Court-approved settlement. There is no guarantee that money or benefits ever will be obtained. If money or benefits become available either by way of settlement or if the Plaintiffs prevail at trial or through legal motions, class members may have to take additional steps, such as submitting a claim form or providing other evidence, in order to determine whether they are eligible to recover any money or benefits. In that event, you will be notified of whatever additional steps you must take. You can

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learn more details about the Lawsuit by visiting the Case Website at www.ValsartanMedicationLawsuit.com. You are not required to but may also register to be informed about case updates at the Case Website.

WHO IS INCLUDED IN THE LAWSUIT?

5. Who are the Defendants?

Consumer Economic Loss Class Defendants

Manufacturer Defendants:

- Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai US Inc.; Prinston Pharmaceutical Inc. d/b/a Solco Healthcare LLC; Solco Healthcare US, LLC; Torrent Pharmaceuticals Ltd.; Torrent Pharma Inc.; Teva Pharmaceutical Industries Ltd.; Teva Pharmaceuticals USA, Inc.; Actavis Pharma, Inc.; Actavis, LLC.; Mylan Laboratories, Ltd.; Mylan N.V.; Mylan Pharmaceuticals, Inc.; Hetero Labs, Ltd.; Hetero Drugs, Limited; Hetero USA Inc.; Camber Pharmaceuticals, Inc.; Aurobindo Pharma, Ltd.; Aurobindo Pharma USA, Inc.; and Aurolife Pharma, LLC

Retail Pharmacy Defendants:

- Albertson's LLC; CVS Pharmacy, Inc.; ESI Mail Pharmacy Service, Inc.; Express Scripts Pharmacy, Inc.; OptumRx, Inc.; Rite Aid Corporation*; Walgreen Co.; and Walmart Inc.

* Rite Aid Corporation is a retail pharmacy defendant but has declared bankruptcy and therefore all claims against Rite Aid are subject to an automatic stay. For more information on Rite Aid's bankruptcy, see <https://restructuring.ra.kroll.com/RiteAid>.

Wholesaler Defendants:

- Cardinal Health, Inc.; McKesson Corporation; and AmerisourceBergen Corporation

Medical Monitoring Class Defendants

Manufacturer Defendants:

- Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai US Inc.; Prinston Pharmaceutical Inc. d/b/a Solco Healthcare LLC; Solco Healthcare US, LLC; Teva Pharmaceutical Industries Ltd.; Teva Pharmaceuticals USA, Inc.; Actavis Pharma, Inc.; Actavis, LLC.; Mylan Laboratories, Ltd.; Mylan N.V.; Mylan, LLC; Aurobindo Pharma Limited; Aurobindo Pharma USA; and Aurolife Pharma, LLC.

Retail Pharmacy Defendants:

- ESI Mail Pharmacy Service, Inc.; Express Scripts Pharmacy, Inc.; and Walmart Inc.

Wholesaler Defendants

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- McKesson Corporation and AmerisourceBergen Corporation

6. Who is included in the Consumer Economic Loss Class and Subclasses?

The Court has certified a Consumer Economic Loss Class and a number of detailed Subclasses within the Consumer Economic Loss Class by claim, defendant, and groupings of states. Below is a simplified class definition authorized by the Court for the express purpose of providing this Notice. More detailed information regarding the Subclasses certified by the Court is available in Exhibit A.

The Consumer Economic Loss Class includes: All individuals in the United States and its territories and possessions who, since at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money for a VCD (intended for personal or household use) that was manufactured by any Active Pharmaceutical Ingredient or Finished Dose Defendant, and distributed or sold in the United States by any Defendant

7. Who is included in the Medical Monitoring Class and Subclasses?

The Court has certified two Medical Monitoring Classes and two detailed Subclasses within one of the Medical Monitoring Classes by claim, defendant, and groupings of states. Below is a simplified Class definition authorized by the Court for the express purpose of providing this Notice. More detailed information regarding the Class and Subclasses certified by the Court is available in Exhibit B.

The Medical Monitoring Class includes Individuals residing in the United States and its territories and possessions (except Mississippi, New Hampshire, North Carolina, and North Dakota) who consumed a sufficiently high LCT of NDMA or NDEA in generic VCDs manufactured by any Active Pharmaceutical Ingredient or Finished Dose Defendant, and marketed in the United States and its territories and possessions, at least since January 1, 2012.

8. Can I be in more than one Class or Subclass?

Yes, you can be a member of more than one Class or Subclass.

For example, if you both paid for and consumed sufficiently high amounts of the drugs at issue in the Lawsuit, you may be included in the Consumer Economic Class and Medical Monitoring Class. In addition, with respect to the Economic Loss Class, class members may be members of more than one Subclass. With respect to the Medical Monitoring Classes and Subclasses, residents of certain states are members of more than one Class or Subclass.

9. What if I have claims against more than one Defendant?

You may be a member of different Subclasses for different Defendants. If you do not exclude yourself, you will remain a part of each applicable Subclass for each Defendant, and you will be bound by any future judgment(s) of the Court as to each Subclass and will be eligible to participate in any future settlement or judgment for each Subclass.

Questions? Call 1-866-875-9644 or visit www.ValsartanMedicationLawsuit.com

10. Are there exceptions to being a Class Member?

Yes. Excluded from some or all of the Consumer Economic Loss and Medical Monitoring Classes and Subclasses are the following: (i) Any judge or magistrate presiding over this action, and members of their families; (ii) Defendants and subsidiary and affiliated entities, and their employees, officers, directors, and agents; (iii) Defendants' legal representatives, assigns, and successors; and (iv) All class members who properly execute and file a timely request for exclusion from the Class and Lawsuit. Additional Defendant-specific exclusions may apply. Visit the Case Website or see Exhibits A and B for details.

11. How can I get help in determining if I am eligible and register for updates?

If you need help in determining your eligibility, you can visit the Case Website at www.ValsartanMedicationLawsuit.com and answer a few simple questions. You can also call 1-866-875-9644 or email info@ValsartanMedicationLawsuit.com for more information. If you believe you are eligible, you can complete a simple form on the Case Website to be informed about case updates. This will help us contact you in the event of any future settlement or judgment.

CAN I OPT-OUT AND EXCLUDE MYSELF?

12. Can I opt-out of the lawsuit?

Yes, you can choose to opt-out, or exclude yourself, from the Classes and Lawsuit entirely. If you do so, you will not be eligible to participate in or receive any benefits from any potential future judgments or settlements awarded to any Class by the Court. You will retain your right to sue the Defendants yourself, but those rights may be time limited, and you should consult your own attorney regarding your ability to bring your own lawsuit if you opt-out from the Classes and Lawsuit.

13. How do I exclude myself?

If you want to keep your right, if any, to separately sue the Defendants, you must take steps to exclude yourself from the Classes and Lawsuit. This is called "opting out" of the Class(es). The deadline for requesting exclusion from the Classes and Lawsuit is January 31, 2024.

To exclude yourself, you must submit a written request for exclusion that includes the following information:

- The name of the Lawsuit: In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation, Case No. 1:19-md-02875-RBK-SAK (D.N.J.);
- Your name and current address;
- Your personal signature; and
- A statement clearly indicating your intent to be excluded from all Classes and the entire Lawsuit, or only the Economic Loss Class, or only the Medical Monitoring Class.

Questions? Call 1-866-875-9644 or visit www.ValsartanMedicationLawsuit.com

A printable exclusion request form is available on the Case Website www.ValsartanMedicationLawsuit.com. Your request for exclusion must be mailed to the address below so it is postmarked or received no later than January 31, 2024.

Valsartan Class Administrator
ATTN: Exclusion Request
PO Box 3376
Baton Rouge, LA 70821

You may also email a scanned copy of your signed exclusion request form to info@ValsartanMedicationLawsuit.com. You must download, print, complete, and sign the PDF exclusion form found on the Case Website to qualify for email submission of your exclusion request.

By electing to be excluded: (1) you will not share in any potential recovery or benefits that might be obtained by the Classes as a result of trial, legal motion, or settlement in the Lawsuit; (2) you will not be bound by any decision in the Lawsuit that is either favorable to the Classes or favorable to the Defendants; and (3) you may present any claims you have against the Defendants by filing your own lawsuit.

14. If I exclude myself, can I still get a payment for economic losses or medical monitoring?

In your exclusion, you must indicate if you are excluding yourself from the Economic Loss Class, the Medical Monitoring Class, or both Classes. You cannot receive benefits from any class from which you exclude yourself.

If you exclude yourself from the Economic Loss Class, you are telling the Court that you do not want to be part of the Economic Loss Class and Lawsuit. You can only get a payment through this Lawsuit if you stay in the Economic Loss Classes and Lawsuit and a final judgment in favor of the Economic Loss Class (either by settlement or trial verdict) approves economic loss payment at a later date.

If you exclude yourself from the Medical Monitoring Class, you are telling the Court that you do not want to be part of the Medical Monitoring Class and Lawsuit. You can only get medical monitoring through this Lawsuit if you stay in the Medical Monitoring Class and Lawsuit, a judgment in favor of the Medical Monitoring Class or a settlement results, and a settlement or Court order approves medical monitoring.

15. If I do not exclude myself, can I still sue the Defendants?

No. If you stay in the Classes and Lawsuit (i.e., do nothing or do not exclude yourself), you give up any right to separately sue any of the Defendants for the claims made in this Lawsuit.

THE LAWYERS AND PLAINTIFFS REPRESENTING YOU

16. Do I have a lawyer in this case?

Yes, if you do not exclude yourself by opting out. The Court has appointed the following law firms to represent the Classes ("Class Counsel"). You will not be charged for their services.

Questions? Call 1-866-875-9644 or visit www.ValsartanMedicationLawsuit.com

Consumer Economic Loss Class Counsel

- Ruben Honik, Honik LLC
- Conlee Whiteley, Kanner & Whiteley, LLC
- John R. Davis, Slack Davis Sanger, LLP

Medical Monitoring Class Counsel

- Rachel Geman, Lieff Cabraser Heimann & Bernstein
- Nicholas Migliaccio, Migliaccio & Rathod LLP

If Class Counsel achieves a recovery for any of the Classes, for example by way of settlement or by trial verdict and judgment, the Court will be asked to approve reasonable attorneys' fees for, as well as reimbursement of expenses to, Class Counsel and other Court-appointed counsel who are members of the Plaintiffs' Executive Committee and the Plaintiffs' Steering Committee appointed by the Court in the Lawsuit and who have advanced time and money on behalf of the Classes. If the Court grants Counsels' requests, fees and expenses would either be deducted from any money obtained for the Classes, or the Court may, if applicable state law permits, order the Defendants to pay attorneys' fees and costs in addition to any damage award to the Classes. Class members will not have to pay any attorneys' fees or expenses themselves, because any fees or expenses paid will only be taken out of money obtained from Defendants, if any, and only to the extent approved by the Court prior to their payment.

17. Can I have my own lawyer?

If you do not exclude yourself, you do not need to hire your own lawyer because Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense and have them appear on your behalf in the Lawsuit.

18. Who Brought this Lawsuit?

This lawsuit was brought by individual Plaintiffs on behalf of classes of other individuals. Those individual Plaintiffs appointed by the Court to represent a class are called Class Representatives and act to represent the interests of all other individuals in the class, called class members. The Class Representatives appointed by the Court are:

Consumer Economic Loss Plaintiffs:

Asha Lamy (AL); Sandra Kelly (AL); Jay Meader (CA); Mark Hays (CA); Charlie Johnston (CA); Marilyn Andre (CA); Peter O'Brien (CT); Ron Molinaro (FL); Estate of Eleonora Deutenberg (FL); Lubertha Powell (GA); Lawrence Edwards (GA); Marlin Anderson (IL); Leland Gildner (IN); Brian Wineinger (IN); Joseph Kessinger (KS); Glenda Cooper (KY); Sandy Bell (LA); Talsie Neal (LA); Estate of Linda Crocker (ME); Veronica Longwell (MA); Jennifer Johnson (MN); Flora McGilvery (MS); Marzanna Glab (NJ); Antoinette

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Sims (NJ); James Lawson (NJ); James Childs (NJ); Radhakrishna Shetty (NJ); Billy Joe Bruner (NM); Alphonse Borkowski (NY); Joseph Cacaccio (NY); John Duffy (NY); Gerald Nelson (NY); Gary Burnett (NC); Miranda Dudley (NC); Dennis Kaplan (OH); Lawrence Semmel (PA); Eric Erwin (TX); Jynona Gail Lee (TX); Brittny Means (TX); Samuel Cisneros (TX); Cheryl Mullins (VA); Robin Roberts (VA); and Mary McLean (VA).

Medical Monitoring Plaintiffs:

Josephine Bell; Sarah Zehr; Robert Kruk; Michael Rives; Robert Fields ; Valerie Rodich-Annese; Roger Tasker; Jo Ann Hamel; Paulette Silberman; and Sylvia Cotton.

THE COURT PROCESS

19. How and when will the Court decide who is right?

If the claims against the Defendants are not resolved by a settlement or otherwise at some future date, Class Counsel and other Court-appointed counsel who are members of the Plaintiffs’ Executive Committee and the Plaintiffs’ Steering Committee in the MDL will have to prove claims alleged on behalf of the Consumer Economic Loss Class and Subclasses and the Medical Monitoring Class and Subclasses at trial. There is no guarantee that Plaintiffs will win, or that they will get any money or other benefits for the Classes. Any judgment will be binding on all class members who have not opted out, regardless of who wins. There are no Losartan or Irbesartan claims included in the certified Classes at this time. Those claims will be addressed at a later time.

20. Do I have to come to the trial?

You do not need to attend the trial. Class Counsel and other Court-appointed counsel who are members of the Plaintiffs’ Executive Committee and the Plaintiffs’ Steering Committee will present the case on your behalf, and counsel for the Defendants will present Defendants’ defenses. You and/or your own lawyer may attend the trial at your own expense. If any Class to which you belong obtains money or benefits as a result of the trial or a settlement, you will be notified about how to participate. We do not know how long this Lawsuit will take but will continue to update the website as information is received. Visit the Case Website to register to be informed about case updates.

IF YOU DO NOTHING

21. What happens if I do nothing at all?

If you do nothing, you will automatically be part of the Classes and Lawsuit if you qualify as a class member. Plaintiffs and their attorneys will act as your representative and counsel, and if they prevail in the Lawsuit

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or a settlement is reached and you are confirmed as a class member, you must file a claim for your proportionate share of any money or other benefits obtained for the Class(es). If the Defendants prevail on any claims, however, you will be bound by that judgment and will not be able to separately sue the Defendants regarding the claims brought in the Lawsuit.

GET MORE INFORMATION

22. How do I get more information?

For more information about the Lawsuit, including assistance in determining whether you qualify as a Class Member of any of the Subclasses for the Economic Loss or Medical Monitoring Classes, please visit the Case Website www.ValsartanMedicationLawsuit.com. You may contact the Class Administrator by email at info@ValsartanMedicationLawsuit.com, by phone at 1-866-875-9644 or by mail at:

Valsartan Class Administrator
P.O. Box 3376
Baton Rouge, LA 70821

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

Questions? Call 1-866-875-9644 or visit www.ValsartanMedicationLawsuit.com

Exhibit A

Economic Loss Class/
Subclass Definitions

MANUFACTURER DEFENDANTS

Manufacturer Defendants Express Warranties Claim:

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s) ¹
ZHP ² , Torrent ³ , Teva ⁴	ZHPTORTEVEW1	All individuals in Alaska; Arizona; California; Colorado; Delaware; D.C.; Hawaii; Idaho; Illinois; Indiana; Iowa; Kansas; Maine; Massachusetts; Minnesota Missouri; New Jersey; New Mexico; Oklahoma; Pennsylvania; Puerto Rico; South Dakota; Virginia; Washington; and West Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants’ legal representatives, assigns, and successors; and, All persons who properly execute and file a timely request for exclusion	Charlie Johnston (CA); Brian Wineinger (IN); Marlin Anderson (IL); Jennifer Johnson (MN); James Childs (NJ); Radhakrishna Shetty (NJ); Billy Joe Bruner (NM); Lawrence Semmel (PA); Cheryl Mullins (VA); Mary McLean (VA)

¹ These Revised Class Definitions and Exclusions Tables have removed Evelyn Rice (AR), Raleigh Wolfe (IN), and Georgia Fatigato (IL).

² ZHP is defined to include the following Defendant entities as set forth in the Third Amended Master Economic Loss Complaint (Dkt. No. 1708): Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai US Inc.; Prinston Pharmaceutical Inc. d/b/a Solco Healthcare LLC; and Solco Healthcare US, LLC.

³ Torrent is defined to include the following Defendant entities as set forth in the Third Amended Master Economic Loss Complaint (Dkt. No. 1708): Torrent Pharmaceuticals Ltd.; and Torrent Pharma Inc.

⁴ Teva is defined to include the following Defendant entities as set forth in the Third Amended Master Economic Loss Complaint (Dkt. No. 1708): Teva Pharmaceutical Industries Ltd.; Teva Pharmaceuticals USA, Inc.; Actavis Pharma, Inc.; and Actavis, LLC.

Consumer Economic Loss Class Definitions and Exclusions Table

		manufactured using ZHP Defendants’ API).	from any Court-approved class.	
ZHP, Torrent, Teva	ZHPTORTEVEW2	All individuals in Alabama; Arkansas; Florida; Georgia; Mississippi Montana; Nebraska; Nevada; New Hampshire; New York; North Carolina; Ohio; Oregon; Rhode Island; South Carolina; Texas; Utah; Vermont; Wisconsin; and Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants’ API).	Id.	Sandra Kelly (AL); Ron Molinaro (FL); Dennis Kaplan (OH); Lubertha Powell (GA); Flora McGilvery (MS); Alphonse Borkowski (NY); Joseph Cacaccio (NY); John Duffy (NY); Gerald Nelson (NY); Gary Burnett (NC); Miranda Dudley (NC); Eric Erwin (TX); Samuel Cisneros (TX); Jynona Gail Lee (TX)
ZHP, Torrent, Teva	ZHPTORTEVEW3	All individuals in Connecticut; Kentucky; North Dakota who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants’ API).	Id.	Glenda Cooper (KY)

Consumer Economic Loss Class Definitions and Exclusions Table

Mylan ⁵ , Teva	MYLTEVEW1	All individuals in Alaska; California; Delaware; D.C.; Hawaii; Idaho; Illinois; Indiana; Iowa; Kansas; Maine; Massachusetts; Minnesota; Missouri; New Jersey; New Mexico; Oklahoma; Pennsylvania; Puerto Rico; South Dakota; Virginia; Washington; and West Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; and, All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Marzanna Glab (NJ); James Lawson (NJ); James Childs (NJ); Mary McLean (VA); Jay Meader (CA); Mark Hays (CA); Robin Roberts (VA)
Mylan, Teva	MYLTEVEW2	All individuals in Alabama; Arkansas; Florida; Georgia; Mississippi; Montana; Nebraska; Nevada; New Hampshire; New York; North Carolina; Ohio; Oregon; Rhode Island; South Carolina; Texas; Utah; Vermont; Wisconsin; and Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal	Id.	Asha Lamy (AL); Lawrence Edwards (GA); Joseph Cacaccio (NY); Gerald Nelson (NY); Eric Erwin (TX); Brittney Means (TX)

⁵ Mylan is defined to include the following Defendant entities as set forth in the Third Amended Master Economic Loss Complaint (Dkt. No. 1708): Mylan Laboratories, Ltd.; Mylan N.V.; and Mylan Pharmaceuticals, Inc.

Consumer Economic Loss Class Definitions and Exclusions Table

		or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants’ API).		
Mylan, Teva	MYLTEVEW3	All individuals in Connecticut; Kentucky; North Dakota, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants’ API).	Id.	Glenda Cooper (KY)
Hetero ⁶	HETEW1	All individuals in Alaska; California; Delaware; D.C.; Hawaii; Idaho; Illinois; Indiana; Iowa; Kansas; Maine; Massachusetts; Minnesota; Missouri; New Jersey; New Mexico; Oklahoma; Pennsylvania; Puerto Rico; South Dakota; Virginia; Washington; and West Virginia, who, since at least May 1, 2018, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents;	Veronica Longwell (MA); James Childs (NJ); Mark Hays (CA); Leland Gildner (IN)

⁶ Hetero is defined to include the following Defendant entities as set forth in the Third Amended Master Economic Loss Complaint (Dkt. No. 1708): Hetero Labs, Ltd.; Hetero Drugs, Limited; Hetero USA Inc.; and, Camber Pharmaceuticals, Inc.

Consumer Economic Loss Class Definitions and Exclusions Table

		or household use) that was manufactured, distributed, or sold by the Hetero Defendants (limited to VCDs manufactured using Hetero Defendants' API).	Defendants' legal representatives, assigns, and successors; and, All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Hetero	HETEW3	All individuals in Connecticut; Kentucky; North Dakota; who, since at least May 1, 2018, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Hetero Defendants (limited to VCDs manufactured using Hetero Defendants' API).	Id.	Peter O'Brien (CT)
Aurobindo ⁷	AUREW1	All individuals in Alaska; California; Delaware; D.C.; Hawaii; Idaho; Illinois; Indiana; Iowa; Kansas; Maine; Massachusetts; Minnesota; Missouri; New Jersey; New Mexico; Oklahoma; Pennsylvania; Puerto Rico; South Dakota; Virginia; Washington; and, West Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021),	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents;	Marlin Anderson (IL); Joseph Kessinger (KS); Estate of Linda Crocker (ME); Veronica Longwell (MA); Jennifer Johnson (MN); Marzanna Glab (NJ); Antoinette Sims (NJ); James Lawson (NJ); James Childs (NJ); Mark Hays (CA); Marilyn Andre (CA);

⁷ Aurobindo is defined to include the following Defendant entities as set forth in the Third Amended Master Economic Loss Complaint (Dkt. No. 1708): Aurobindo Pharma, Ltd.; Aurobindo Pharma USA, Inc.; Aurolife Pharma, LLC

Consumer Economic Loss Class Definitions and Exclusions Table

		paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Defendants' legal representatives, assigns, and successors; and, All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Aurobindo	AUREW2	All individuals in Alabama; Arkansas; Florida; Georgia; Mississippi Montana; Nebraska; Nevada; New Hampshire; New York; North Carolina; Ohio; Oregon; Rhode Island; South Carolina; Texas; Utah; Vermont; Wisconsin; and Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Id.	Estate of Elenora Deutenberg/Feijoo (FL); Dennis Kaplan (OH); Lawrence Edwards (GA); Joseph Cacaccio (NY); Gerald Nelson (NY); Eric Erwin (TX)

Consumer Economic Loss Class Definitions and Exclusions Table

Manufacturer Defendants Implied Warranty Claim:

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
ZHP, Torrent, Teva	ZHPTORTEVIW1	All individuals in Alaska; California; Colorado; Delaware; D.C.; Hawaii; Indiana; Iowa; Maine; Massachusetts; New Jersey; New Mexico; Oklahoma; Puerto Rico; Rhode Island; South Dakota; Virginia; and West Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants' API).	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; and, All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Charlie Johnston (CA); James Childs (NJ); Cheryl Mullins (VA); Radhakrishna Shetty (NJ); Billy Joe Bruner (NM); Brian Wineinger (IN); Mary McLean (VA)
ZHP, Torrent, Teva	ZHPTORTEVIW2	All individuals in Arkansas; Georgia; Maryland; Michigan; Minnesota; Mississippi; Missouri; Montana; Nebraska; Nevada; New Hampshire; North Dakota; South Carolina; Texas; and Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent	Id.	Lubertha Powell (GA); Jennifer Johnson (MN); Flora McGilvery (MS); Eric Erwin (TX); Jynona Gail Lee (TX); Samuel Cisneros (TX)

Consumer Economic Loss Class Definitions and Exclusions Table

		Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants' API).		
ZHP, Torrent, Teva	ZHPTORTEVIW3	All individuals in Arizona; Connecticut; Florida; Idaho; Illinois; Kansas; Kentucky; North Carolina; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants' API).	Id.	Ron Molinaro (FL); Elenora Deutenberg/Feijoo (FL); Marlin Anderson (IL); Gary Burnett (NC); Miranda Dudley (NC)
ZHP, Torrent, Teva	ZHPTORTEVIW4	All individuals in Alabama; New York; Ohio; Oregon; Tennessee; Utah; Vermont; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants' API).	Id.	Sandra Kelly (AL); Alphonse Borkowski (NY); Joseph Cacaccio (NY); John Duffy (NY); Gerald Nelson (NY); Dennis Kaplan (OH)
ZHP, Torrent, Teva	ZHPTORTEVIW5	All individuals in Louisiana, who, since at least January 1, 2012, and through the date of final recall (as of	Id.	Talsie Neal (LA)

Consumer Economic Loss Class Definitions and Exclusions Table

		November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants' API).		
Mylan, Teva	MYLTEVIW1	All individuals in Alaska; California; Colorado; Delaware; D.C.; Hawaii; Indiana; Iowa; Maine; Massachusetts; New Jersey; New Mexico; Oklahoma; Puerto Rico; Rhode Island; South Dakota; Virginia; and West Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; and, All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Jay Meader (CA); Mark Hays (CA); Marzanna Glab (NJ); James Lawson (NJ); James Childs (NJ); Robin Roberts (VA)
Mylan, Teva	MYLTEVIW2	All individuals in Arkansas; Georgia; Maryland; Michigan; Minnesota; Mississippi; Missouri; Montana; Nebraska; Nevada; New Hampshire; North Dakota; South Carolina; Texas; and Wyoming, who, since at least January 1, 2012, and through the date	Id.	Lawrence Edwards (GA); Mary McLean (VA); Eric Erwin (TX); Brittney Means (TX)

Consumer Economic Loss Class Definitions and Exclusions Table

		of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).		
Mylan, Teva	MYLTEVIW4	All individuals in Alabama; New York; Ohio; Oregon; Tennessee; Utah; Vermont; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).	Id.	Asha Lamy (AL); Joseph Caccaccio (NY); Gerald Nelson (NY)
Hetero	HETIW1	All individuals in Alaska; California; Colorado; Delaware; D.C.; Hawaii; Indiana; Iowa; Maine; Massachusetts; New Jersey; New Mexico; Oklahoma; Puerto Rico; Rhode Island; South Dakota; Virginia; and West Virginia, who, since at least May 1, 2018, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; and,	Mark Hays (CA); James Childs (NJ); Leland Gildner (IN); Veronica Longwell (MA)

Consumer Economic Loss Class Definitions and Exclusions Table

		household use) that was manufactured, distributed, or sold by the Hetero Defendants (limited to VCDs manufactured using Hetero Defendants' API).	All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Hetero	HETIW3	All individuals in Arizona; Connecticut; Florida; Idaho; Illinois; Kansas; Kentucky; North Carolina; Washington, who, since at least May 1, 2018, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Hetero Defendants (limited to VCDs manufactured using Hetero Defendants' API).	Id.	Peter O'Brien (CT)
Aurobindo	AURIW1	All individuals in Alaska; California; Colorado; Delaware; D.C.; Hawaii; Indiana; Iowa; Maine; Massachusetts; New Jersey; New Mexico; Oklahoma; Puerto Rico; Rhode Island; South Dakota; Virginia; and West Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; and, All persons who properly execute and file a timely request	Mark Hays (CA); Marilyn Andre (CA); Marzanna Glab (NJ); Antoinette Sims (NJ); James Lawson (NJ); James Childs (NJ); Estate of Linda Crocker/Davis (ME); Veronica Longwell (MA);

Consumer Economic Loss Class Definitions and Exclusions Table

		VCDs manufactured using Aurobindo Defendants' API).	for exclusion from any Court-approved class.	
Aurobindo	AURIW2	All individuals in Arkansas; Georgia; Maryland; Michigan; Minnesota; Mississippi; Missouri; Montana; Nebraska; Nevada; New Hampshire; North Dakota; South Carolina; Texas; and Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Id.	Lawrence Edwards (GA); Jennifer Johnson (MN); Eric Erwin (TX)
Aurobindo	AURIW3	All individuals in Arizona; Connecticut; Florida; Idaho; Illinois; Kansas; Kentucky; North Carolina; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Id.	Estate of Elenora Deutenberg/Feijoo (FL); Marlin Anderson (IL);
Aurobindo	AURIW4	All individuals in Alabama; New York; Ohio; Oregon; Tennessee; Utah; Vermont; and Wisconsin, who, since at	Id.	Joseph Cacaccio (NY); Gerald Nelson (NY); Dennis Kaplan (OH)

Consumer Economic Loss Class Definitions and Exclusions Table

		least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).		
Aurobindo	AURIW5	All individuals in Louisiana, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Id.	Sandy Bell (LA)

Consumer Economic Loss Class Definitions and Exclusions Table

Manufacturer Defendants Common Law Fraud Claim:

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
ZHP, Torrent, Teva	ZHPTORTEVFR1	All individuals in California; Connecticut; Delaware; Georgia; Indiana; Kansas; Kentucky; Maine; Maryland; Michigan; Nebraska; New Hampshire; New Mexico; Pennsylvania; South Carolina; Tennessee; Texas; Utah; West Virginia; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants' API).	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; and, All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Charlie Johnston (CA); Lubertha Powell (GA); Brian Wineinger (IN); Glenda Cooper (KY); Billy Joe Bruner (NM); Lawrence Semmel (PA); Eric Erwin (TX); Jynona Gail Lee (TX); Samuel Cisneros (TX)
ZHP, Torrent, Teva	ZHPTORTEVFR2	All individuals in Alabama; Arizona; Hawaii; Illinois; Mississippi; Missouri; Montana; Nevada; and Oregon, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of	Id.	Sandra Kelly (AL); Marlin Anderson (IL); Flora McGilverly (MS)

Consumer Economic Loss Class Definitions and Exclusions Table

		money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants' API).		
ZHP, Torrent, Teva	ZHPTORTEVFR3	All individuals in Alaska; Arkansas; Colorado; D.C.; Florida; Idaho; Iowa; Louisiana; Massachusetts; Minnesota; New Jersey; New York; North Carolina; North Dakota; Ohio; Oklahoma; Rhode Island; South Dakota; Vermont; Virginia; Washington; Wyoming; and Puerto Rico, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants' API).	Id.	Ron Molinaro (FL); Talsie Neal (LA); Jennifer Johnson (MN); James Childs (NJ); Radhakrishna Shetty (NJ); Alphonse Borkowski (NY); Joseph Cacaccio (NY); John Duffy (NY); Gerald Nelson (NY); Gary Burnett (NC); Miranda Dudley (NC); Dennis Kaplan (OH); Cheryl Mullins (VA); Mary McLean (VA)

Consumer Economic Loss Class Definitions and Exclusions Table

Mylan, Teva	MYLTEVFR1	<p>All individuals in California; Connecticut; Delaware; Georgia; Indiana; Kansas; Kentucky; Maine; Maryland; Michigan; Nebraska; New Hampshire; New Mexico; Pennsylvania; South Carolina; Tennessee; Texas; Utah; West Virginia; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).</p>	<p>Any judge or magistrate presiding over this action, and members of their families;</p> <p>Defendants and affiliated entities, and their employees, officers, directors, and agents;</p> <p>Defendants' legal representatives, assigns, and successors; and,</p> <p>All persons who properly execute and file a timely request for exclusion from any Court-approved class.</p>	<p>Jay Meader (CA); Mark Hays (CA); Lawrence Edwards (GA); Glenda Cooper (KY); Eric Erwin (TX); Brittney Means (TX)</p>
Mylan, Teva	MYLTEVFR2	<p>All individuals in Alabama; Arizona; Hawaii; Illinois; Mississippi; Missouri; Montana; Nevada; and Oregon, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or</p>	<p>Id.</p>	<p>Asha Lamy (AL)</p>

Consumer Economic Loss Class Definitions and Exclusions Table

		household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants’ API).		
Mylan, Teva	MYLTEVFR3	All individuals in Alaska; Arkansas; Colorado; D.C.; Florida; Idaho Iowa; Louisiana; Massachusetts; Minnesota; New Jersey; New York; North Carolina; North Dakota; Ohio; Oklahoma; Rhode Island; South Dakota; Vermont; Virginia; Washington; Wyoming; and Puerto Rico, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants’ API).	Id.	Marzanna Glab (NJ); James Lawson (NJ); James Childs (NJ); Joseph Cacaccio (NY); Gerald Nelson (NY); Mary McLean (VA); Robin Roberts (VA)
Hetero	HETFR1	All individuals in California; Connecticut; Delaware; Georgia; Indiana; Kansas; Kentucky; Maine; Maryland;	Any judge or magistrate presiding over this action, and members of their families;	Mark Hays (CA); Peter O’Brien (CT); Leland Gildner (IN);

Consumer Economic Loss Class Definitions and Exclusions Table

		Michigan; Nebraska; New Hampshire; New Mexico; Pennsylvania; South Carolina; Tennessee; Texas; Utah; West Virginia; and Wisconsin, who, since at least May 1, 2018, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Hetero Defendants (limited to VCDs manufactured using Hetero Defendants’ API).	<p>Defendants and affiliated entities, and their employees, officers, directors, and agents;</p> <p>Defendants’ legal representatives, assigns, and successors; and,</p> <p>All persons who properly execute and file a timely request for exclusion from any Court-approved class.</p>	
Hetero	HETFR3	All individuals in Alaska; Arkansas; Colorado; D.C.; Florida; Idaho; Iowa; Louisiana; Massachusetts; Minnesota; New Jersey; New York; North Carolina; North Dakota; Ohio; Oklahoma; Rhode Island; South Dakota; Vermont; Virginia; Washington; Wyoming; and Puerto Rico, who, since at least May 1, 2018, and to the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that	Id.	James Childs (NJ); Veronica Longwell (MA)

Consumer Economic Loss Class Definitions and Exclusions Table

		was manufactured, distributed, or sold by the Hetero Defendants (limited to VCDs manufactured using Hetero Defendants' API).		
Aurobindo	AURFR1	All individuals in California; Connecticut; Delaware; Georgia; Indiana; Kansas; Kentucky; Maine; Maryland; Michigan; Nebraska; New Hampshire; New Mexico; Pennsylvania; South Carolina; Tennessee; Texas; Utah; West Virginia; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; and, All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Mark Hays (CA); Marilyn Andre (CA); Lawrence Edwards (GA); Joseph Kessinger (KS); Eric Erwin (TX); Estate of Linda Crocker (ME);
Aurobindo	AURFR2	All individuals in Alabama; Arizona; Hawaii; Illinois; Mississippi; Missouri; Montana; Nevada; and Oregon, who, since at least January 1, 2012, and through the date of final recall (as of November 10,	Id.	Marlin Anderson (IL);

Consumer Economic Loss Class Definitions and Exclusions Table

		2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).		
Aurobindo	AURFR3	All individuals in Alaska; Arkansas; Colorado; D.C.; Florida; Idaho; Iowa; Louisiana; Massachusetts; Minnesota; New Jersey; New York; North Carolina; North Dakota; Ohio; Oklahoma; Rhode Island; South Dakota; Vermont; Virginia; Washington; Wyoming; and Puerto Rico, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Id.	Estate of Elenora Deutenberg/Feijoo (FL); Sandy Bell (LA); Veronica Longwell (MA); Jennifer Johnson (MN); Marzanna Glab (NJ); Antoinette Sims (NJ); James Lawson (NJ); Joseph Cacaccio (NY); Gerald Nelson (NY); Dennis Kaplan (OH)

Consumer Economic Loss Class Definitions and Exclusions Table

Manufacturer Defendants Consumer Protection Act Claim

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
ZHP, Torrent, Teva	ZHPTORTEVCPA1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho; Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Vermont; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants’ legal representatives, assigns, and successors; and, All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Charlie Johnston (CA); Ron Molinaro (FL); Estate of Elenora Deutenberg/Feijoo (FL); Talsie Neal (LA); Alphonse Borkowski (NY); Joseph Cacaccio (NY); John Duffy (NY); Gerald Nelson (NY); Gary Burnett (NC); Miranda Dudley (NC); Dennis Kaplan (OH); Lawrence Semmel (PA)

Consumer Economic Loss Class Definitions and Exclusions Table

		VCDs manufactured using ZHP Defendants' API).		
ZHP, Torrent, Teva	ZHPTORTEVCPA2	All individuals in Delaware; Minnesota; New Jersey; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants' API).	Id.	Jennifer Johnson (MN); James Childs (NJ); Radhakrishna Shetty (NJ)
ZHP, Torrent, Teva	ZHPTORTEVCPA3	All individuals in Maine; Massachusetts; and Texas, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the	Id.	Eric Erwin (TX); Brittney Means (TX); Samuel Cisneros (TX); Jynona Gail Lee (TX)

Consumer Economic Loss Class Definitions and Exclusions Table

		ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants' API).		
ZHP, Torrent, Teva	ZHPTORTEVCPA4	All individuals in Colorado; Illinois; Kentucky; Nevada; New Mexico; South Dakota; Utah; and Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants' API).	Id.	Marlin Anderson (IL); Glenda Cooper (KY); Billy Joe Bruner (NM); Cheryl Mullins (VA); Robin Roberts (VA); Mary McLean (VA)
ZHP, Torrent, Teva	ZHPTORTEVCPA5	All individuals in Indiana; and Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing	Id.	Brian Wineinger (IN);

Consumer Economic Loss Class Definitions and Exclusions Table

		drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants’ API).		
Mylan, Teva	MYLTEVCPA1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho; Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Vermont; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants’ legal representatives, assigns, and successors; and, All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Jay Meader (CA); Mark Hays (CA); Peter O’Brien (CT); Joseph Cacaccio (NY); Gerald Nelson (NY)

Consumer Economic Loss Class Definitions and Exclusions Table

		Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).		
Mylan, Teva	MYLTEVCPA2	All individuals in Delaware; Minnesota; New Jersey; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).	Id.	Marzanna Glab (NJ); James Lawson (NJ); James Childs (NJ);
Mylan, Teva	MYLTEVCPA3	All individuals in Maine; Massachusetts; and Texas, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured,	Id.	Eric Erwin (TX); Brittney Means (TX);

Consumer Economic Loss Class Definitions and Exclusions Table

		distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).		
Mylan, Teva	MYLTEVCPA4	All individuals in Colorado; Illinois; Kentucky; Nevada; New Mexico; South Dakota; Utah; and Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).	Id.	Glenda Cooper (KY); Mary McLean (VA); Robin Roberts (VA);
Mylan, Teva	MYLTEVCPA5	All individuals in Indiana; and Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for	Id.	Leland Gildner (IN)

Consumer Economic Loss Class Definitions and Exclusions Table

		a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).		
Hetero	HETCPA1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho; Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Vermont; and Washington, who, since at least May 1, 2018, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed,	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; and, All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Mark Hays (CA); Peter O'Brien (CT);

Consumer Economic Loss Class Definitions and Exclusions Table

		or sold by the Hetero Defendants (limited to VCDs manufactured using Hetero Defendants’ API).		
Hetero	HETCPA2	All individuals in Delaware; Minnesota; New Jersey; and Wisconsin, who, since at least May 1, 2018, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Hetero Defendants (limited to VCDs manufactured using Hetero Defendants’ API).	Id.	James Childs (NJ)
Hetero	HETCPA5	All individuals in Indiana; and Wyoming, who, since at least May 1, 2018, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Hetero	Id.	Leland Gildner (IN)

Consumer Economic Loss Class Definitions and Exclusions Table

		Defendants (limited to VCDs manufactured using Hetero Defendants' API).		
Aurobindo	AURCPA1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho; Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Vermont; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; and, All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Mark Hays (CA); Marilyn Andre (CA); Estate of Elenora Deutenberg/Feijoo (FL); Sandy Bell (LA); Joseph Cacaccio (NY); Gerald Nelson (NY); Dennis Kaplan (OH)
Aurobindo	AURCPA2	All individuals in Delaware; Minnesota;	Id.	Jennifer Johnson (MN); Marzanna Glab (NJ); Antoinette Sims (NJ);

Consumer Economic Loss Class Definitions and Exclusions Table

		New Jersey; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants’ API).		James Lawson (NJ); James Childs (NJ)
Aurobindo	AURCPA3	All individuals in Maine; Massachusetts; and Texas, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants’ API).	Id.	Estate of Linda Crocker (ME); Veronica Longwell (MA); Eric Erwin (TX)

Consumer Economic Loss Class Definitions and Exclusions Table

Aurobindo	AURCPA4	All individuals in Colorado; Illinois; Kentucky; Nevada; New Mexico; South Dakota; Utah; and Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Id.	Marlin Anderson (IL);
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RETAIL PHARMACY DEFENDANTS

Retail Pharmacy Defendants Implied Warranty Claim:

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
Walgreens	WALIW1	All individuals in Alaska; Colorado; Delaware; District of Columbia; Hawaii; Indiana; New Mexico; Oklahoma; Pennsylvania; and Rhode Island, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walgreens Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	<p>Any judge or magistrate presiding over this action, and members of their families;</p> <p>Defendants and affiliated entities, and their employees, officers, directors, and agents;</p> <p>Defendants’ legal representatives, assigns, and successors;</p> <p>Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants’ valsartan-containing drugs dispensed by Walgreens prior to May 1, 2018;</p> <p>All persons who properly execute and file a timely request for exclusion from any Court-approved class.</p>	Billy Joe Bruner (NM)
CVS	CVSIW1	All individuals in Alaska; Colorado; Delaware; District of Columbia; Hawaii; Indiana; New	Any judge or magistrate presiding over this action, and members of their families;	Lawrence Semmel (PA)

Consumer Economic Loss Class Definitions and Exclusions Table

		<p>Mexico; Oklahoma; Pennsylvania; and Rhode Island, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant CVS Pharmacy, Inc., and manufactured, distributed, or sold by any of the Manufacturer Defendants.</p>	<p>Defendants and affiliated entities, and their employees, officers, directors, and agents;</p> <p>Defendants’ legal representatives, assigns, and successors;</p> <p>Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants’ valsartan-containing drugs dispensed by CVS prior to May 1, 2018;</p> <p>All persons who properly execute and file a timely request for exclusion from any Court-approved class.</p>	
Walmart	WMTIW1	<p>All individuals in Alaska; Colorado; Delaware; District of Columbia; Hawaii; Indiana; New Mexico; Oklahoma; Pennsylvania; and Rhode Island, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended</p>	<p>Any judge or magistrate presiding over this action, and members of their families;</p> <p>Defendants and affiliated entities, and their employees, officers, directors, and agents;</p> <p>Defendants’ legal representatives, assigns, and successors;</p> <p>Individuals whose only valsartan-containing drug purchases (intended</p>	Brian Wineinger (IN)

Consumer Economic Loss Class Definitions and Exclusions Table

		for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam’s Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants’ valsartan-containing drugs dispensed by Walmart (including Sam’s Club locations) prior to May 1, 2018; All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Kroger	KROIW1	All individuals in Alaska; Colorado; Delaware; District of Columbia; Hawaii; Indiana; New Mexico; Oklahoma; Pennsylvania; and Rhode Island, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant The Kroger, Co., and manufactured, distributed, or sold by any	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants’ legal representatives, assigns, and successors; Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants’ valsartan-containing drugs dispensed by Kroger prior to May 1, 2018;	Leland Gildner (IN)

Consumer Economic Loss Class Definitions and Exclusions Table

		of the Manufacturer Defendants.	All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
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Consumer Economic Loss Class Definitions and Exclusions Table

Retail Pharmacy Defendants’ Consumer Protection Claim:

* Rite Aid is a pharmacy defendant but has declared bankruptcy and therefore all claims against Rite Aid are subject to an automatic stay. For more information on Rite Aid’s bankruptcy, see <https://restructuring.ra.kroll.com/RiteAid>.

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
CVS Consumer Protection Act State Grouping No. 1	CVSCPA1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho; Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Vermont; Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant CVS Pharmacy, Inc. (including Target locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants’ legal representatives, assigns, and successors; Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants’ valsartan-containing drugs dispensed by CVS prior to May 1, 2018; All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Jay Meader (CA); Mark Hays (CA); Peter O’Brien (CT); Ron Molinaro (FL); Estate of Elenora Deutenberg/Feijoo (FL); Sandy Bell (LA); Lawrence Semmel (PA)

Consumer Economic Loss Class Definitions and Exclusions Table

<p>CVS Consumer Protection Act State Grouping No. 2</p>	<p>CVSCPA2</p>	<p>All individuals in Delaware; Minnesota; New Jersey; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant CVS Pharmacy, Inc. (including Target locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.</p>	<p>Id.</p>	<p>Marzanna Glab (NJ); James Lawson (NJ)</p>
<p>CVS Consumer Protection Act State Grouping No. 3</p>	<p>CVSCPA3</p>	<p>All individuals in Maine; Massachusetts; and Texas, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant CVS Pharmacy, Inc. (including Target locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.</p>	<p>Id.</p>	<p>Veronica Longwell (MA); Brittney Means (TX)</p>
<p>Walgreens Consumer Protection Act State</p>	<p>WALCPA1</p>	<p>All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho;</p>	<p>Any judge or magistrate presiding over this action, and members of their families;</p>	<p>Estate of Elenora Deutenberg/Feijoo (FL); John Duffy (NY)</p>

Consumer Economic Loss Class Definitions and Exclusions Table

<p>Grouping No. 1</p>		<p>Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Vermont and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walgreens Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.</p>	<p>Defendants and affiliated entities, and their employees, officers, directors, and agents;</p> <p>Defendants’ legal representatives, assigns, and successors;</p> <p>Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants’ valsartan-containing drugs dispensed by Walgreens prior to May 1, 2018;</p> <p>All persons who properly execute and file a timely request for exclusion from any Court-approved class.</p>	
<p>Walgreens Consumer Protection Act State Grouping No. 2</p>	<p>WALCPA2</p>	<p>All individuals in Delaware; Minnesota; New Jersey; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant</p>	<p>Id.</p>	<p>Radhakrishna Shetty (NJ)</p>

Consumer Economic Loss Class Definitions and Exclusions Table

		Walgreens Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.		
Walgreens Consumer Protection Act State Grouping No. 3	WALCPA3	All individuals in Maine; Massachusetts; and Texas, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walgreens Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Eric Erwin (TX); Brittney Means (TX)
Rite-Aid* Consumer Protection Act State Grouping No. 1	RITCPA1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho; Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Vermont; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; Individuals whose only valsartan-containing drug purchases (intended for	Alphonse Borkowski (NY); Joseph Cacaccio (NY); Gerald Nelson (NY); Dennis Kaplan (OH)

Consumer Economic Loss Class Definitions and Exclusions Table

		containing drug (intended for personal or household use) that was dispensed by Defendant Rite-Aid Corporation*, and manufactured, distributed, or sold by any of the Manufacturer Defendants.	personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants’ valsartan-containing drugs dispensed by Rite-Aid* prior to May 1, 2018; All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Walmart Consumer Protection Act State Grouping No. 1	WMTCPA1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho; Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Vermont and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam’s Club locations), and	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants’ legal representatives, assigns, and successors; Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants’ valsartan-containing drugs dispensed by	Talsie Neal (LA); Gary Burnett (NC)

Consumer Economic Loss Class Definitions and Exclusions Table

		manufactured, distributed, or sold by any of the Manufacturer Defendants.	Walmart (including Sam’s Club locations) prior to May 1, 2018; All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Walmart Consumer Protection Act State Grouping No. 2	WMTCPA2	All individuals in Delaware; Minnesota; New Jersey; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam’s Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Jennifer Johnson (MN)
Walmart Consumer Protection Act State Grouping No. 3	WMTCPA3	All individuals in Maine; Massachusetts; and Texas, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was	Id.	Jynona Gail Lee (TX); Samuel Cisneros (TX)

Consumer Economic Loss Class Definitions and Exclusions Table

		dispensed by Defendant Walmart Stores, Inc. (including Sam’s Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.		
Express Scripts Consumer Protection Act State Grouping No. 1	ESICPA1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho; Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Vermont and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Express Scripts, Inc., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	<p>Any judge or magistrate presiding over this action, and members of their families;</p> <p>Defendants and affiliated entities, and their employees, officers, directors, and agents;</p> <p>Defendants’ legal representatives, assigns, and successors;</p> <p>Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants’ valsartan-containing drugs dispensed by Express Scripts prior to May 1, 2018;</p> <p>All persons who properly execute and file a timely request for exclusion from any Court-approved class.</p>	Mark Hays (CA); Merilyn Andre (CA)

Consumer Economic Loss Class Definitions and Exclusions Table

OptumRx Consumer Protection Act State Grouping No. 1	OPTCPA1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho; Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Vermont and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant OptumRx, and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants’ legal representatives, assigns, and successors; Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants’ valsartan-containing drugs dispensed by OptumRx prior to May 1, 2018; All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Charlie Johnston (CA)
Albertson’s Consumer Protection Act State	ALBCPA1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho;	Any judge or magistrate presiding over this action, and members of their families;	Merilyn Andre (CA)

Consumer Economic Loss Class Definitions and Exclusions Table

<p>Grouping No. 1</p>		<p>Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Vermont and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Albertson’s LLC (including Sav-On), and manufactured, distributed, or sold by any of the Manufacturer Defendants.</p>	<p>Defendants and affiliated entities, and their employees, officers, directors, and agents;</p> <p>Defendants’ legal representatives, assigns, and successors;</p> <p>Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants’ valsartan-containing drugs dispensed by Albertson’s (including Sav-On) prior to May 1, 2018;</p> <p>All persons who properly execute and file a timely request for exclusion from any Court-approved class.</p>	
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Consumer Economic Loss Class Definitions and Exclusions Table

Retail Pharmacy Defendants’ Unjust Enrichment Claim:

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
CVS Unjust Enrichment Grouping No. 1	CVSUE1	All individuals in Texas, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant CVS Pharmacy, Inc. (including Target locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	<p>Any judge or magistrate presiding over this action, and members of their families;</p> <p>Defendants and affiliated entities, and their employees, officers, directors, and agents;</p> <p>Defendants’ legal representatives, assigns, and successors;</p> <p>Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants’ valsartan-containing drugs dispensed by CVS prior to May 1, 2018;</p> <p>All persons who properly execute and file a timely request for exclusion from any Court-approved class.</p>	Brittney Means (TX)
CVS Unjust Enrichment Grouping No. 2	CVSUE2	All individuals in Alabama; California; Colorado; Indiana; Montana, who, since at least January 1, 2012, and through the	Id.	Mark Hays (CA); Jay Meader (CA);

Consumer Economic Loss Class Definitions and Exclusions Table

		date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant CVS Pharmacy, Inc. (including Target locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.		
CVS Unjust Enrichment Grouping No. 4	CVSUE4	All individuals in Alaska; Idaho; Nebraska; New Jersey; North Dakota; Pennsylvania; Virginia; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant CVS Pharmacy, Inc. (including Target locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Marzanna Glab (NJ); James Lawson (NJ); Larry Semmel (PA);
CVS Unjust Enrichment Grouping No. 5	CVSUE5	All individuals in D.C.; Georgia; Hawaii; Illinois; Iowa; Kansas; Louisiana; Maine; Massachusetts; Mississippi; Missouri; Nevada; New Mexico;	Id.	Lawrence Edwards (GA); Marlin Anderson (IL); Sandy Bell (LA); Joseph Kessinger (KS); Veronica Longwell (MA)

Consumer Economic Loss Class Definitions and Exclusions Table

		New York; North Carolina; Oklahoma; Oregon; South Carolina; South Dakota; Tennessee; Utah; and, Puerto Rico, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant CVS Pharmacy, Inc. (including Target locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.		
CVS Unjust Enrichment Grouping No. 6	CVSUE6	All individuals in Delaware; Florida; Kentucky; Ohio who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant CVS Pharmacy, Inc. (including Target locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Ron Molinaro (FL)
CVS Unjust Enrichment	CVSUE7	All individuals in Connecticut who, since at least January 1, 2012, and through the date of	Id.	Peter O'Brien (CT)

Consumer Economic Loss Class Definitions and Exclusions Table

<p>Grouping No. 7</p>		<p>final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant CVS Pharmacy, Inc. (including Target locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.</p>		
<p>Walgreens Unjust Enrichment Grouping No. 1</p>	<p>WALUE1</p>	<p>All individuals in Texas, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walgreens Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.</p>	<p>Any judge or magistrate presiding over this action, and members of their families;</p> <p>Defendants and affiliated entities, and their employees, officers, directors, and agents;</p> <p>Defendants’ legal representatives, assigns, and successors;</p> <p>Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants’ valsartan-containing drugs dispensed by Walgreens prior to May 1, 2018;</p>	<p>Eric Erwin (TX); Brittney Means (TX)</p>

Consumer Economic Loss Class Definitions and Exclusions Table

			All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Walgreens Unjust Enrichment Grouping No. 4	WALUE4	All individuals in Alaska; Idaho; Nebraska; New Jersey; North Dakota; Pennsylvania; Virginia; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walgreens Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Robin Roberts (VA); Radhakrishna Shetty (NJ)
Walgreens Unjust Enrichment Grouping No. 5	WALUE5	All individuals in D.C.; Georgia; Hawaii; Illinois; Iowa; Kansas; Louisiana; Maine; Massachusetts; Mississippi; Missouri; Nevada; New Mexico; New York; North Carolina; Oklahoma; Oregon; South Carolina; South Dakota; Tennessee; Utah; and Puerto Rico, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of	Id.	Lubertha Powell (GA); Marlin Anderson (IL); Billy Joe Bruner (NM); John Duffy (NY)

Consumer Economic Loss Class Definitions and Exclusions Table

		money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walgreens Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.		
Walgreens Unjust Enrichment Grouping No. 6	WALUE6	All individuals in Delaware; Florida; Kentucky; Ohio, who, through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walgreens Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Estate of Elenora Deutenberg/Feijoo (FL);
Rite-Aid* Unjust Enrichment Grouping No. 5	RITUE5	All individuals in D.C.; Georgia; Hawaii; Illinois; Iowa; Kansas; Louisiana; Maine; Massachusetts; Mississippi; Missouri; Nevada; New Mexico; New York; North Carolina; Oklahoma; Oregon; South Carolina; South Dakota; Tennessee; Utah; and Puerto Rico, who, since at least January 1, 2012, and through the date of	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors;	Lawrence Edwards (GA); Alphonse Borkowski (NY); Joseph Cacaccio (NY); Gerald Nelson (NY)

Consumer Economic Loss Class Definitions and Exclusions Table

		final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Rite-Aid Corporation*, and manufactured, distributed, or sold by any of the Manufacturer Defendants.	<p>Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants’ valsartan-containing drugs dispensed by Rite-Aid* prior to May 1, 2018;</p> <p>All persons who properly execute and file a timely request for exclusion from any Court-approved class.</p>	
Rite-Aid* Unjust Enrichment Grouping No. 6	RITUE6	All individuals in Delaware, Florida, Kentucky, Ohio, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Rite-Aid Corporation*, and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Dennis Kaplan (OH)
Walmart Unjust Enrichment	WMTUE1	All individuals in Texas, who, since at least January 1, 2012, and through the date of final	Any judge or magistrate presiding over this action, and members of their families;	Samuel Cisneros (TX); Jyona Gail Lee (TX);

Consumer Economic Loss Class Definitions and Exclusions Table

<p>Grouping No. 1</p>		<p>recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam’s Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.</p>	<p>Defendants and affiliated entities, and their employees, officers, directors, and agents;</p> <p>Defendants’ legal representatives, assigns, and successors;</p> <p>Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants’ valsartan-containing drugs dispensed by Walmart (including Sam’s Club locations) prior to May 1, 2018;</p> <p>All persons who properly execute and file a timely request for exclusion from any Court-approved class.</p>	
<p>Walmart Unjust Enrichment Grouping No. 2</p>	<p>WMTUE2</p>	<p>All individuals in Alabama; California; Colorado; Indiana; Montana, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a</p>	<p>Id.</p>	<p>Brian Wineinger (IN)</p>

Consumer Economic Loss Class Definitions and Exclusions Table

		valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam’s Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.		
Walmart Unjust Enrichment Grouping No. 3	WMTUE3	All individuals in Arizona; Arkansas; Maryland; Minnesota; Rhode Island; Vermont; Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam’s Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Jennifer Johnson (MN)
Walmart Unjust Enrichment Grouping No. 4	WMTUE4	All individuals in Alaska; Idaho; Nebraska; New Jersey; North Dakota; Pennsylvania; Virginia; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid	Id.	Robin Roberts (VA)

Consumer Economic Loss Class Definitions and Exclusions Table

		any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam’s Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.		
Walmart Unjust Enrichment Grouping No. 5	WMTUE5	All individuals in D.C.; Georgia; Hawaii; Illinois; Iowa; Kansas; Louisiana; Maine; Massachusetts; Mississippi; Missouri; Nevada; New Mexico; New York; North Carolina; Oklahoma; Oregon; South Carolina; South Dakota; Tennessee; Utah; and Puerto Rico, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam’s Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Gary Burnett (NC); Flora McGilvery (MS); Talsie Neal (LA);

Consumer Economic Loss Class Definitions and Exclusions Table

<p>Express Scripts Unjust Enrichment Grouping No. 2</p>	<p>ESIUE2</p>	<p>All individuals in Alabama; California; Colorado; Indiana; Montana, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Express Scripts, Inc., and manufactured, distributed, or sold by any of the Manufacturer Defendants.</p>	<p>Any judge or magistrate presiding over this action, and members of their families;</p> <p>Defendants and affiliated entities, and their employees, officers, directors, and agents;</p> <p>Defendants’ legal representatives, assigns, and successors;</p> <p>Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants’ valsartan-containing drugs dispensed by Express Scripts prior to May 1, 2018;</p> <p>All persons who properly execute and file a timely request for exclusion from any Court-approved class.</p>	<p>Marilyn Andre (CA); Mark Hays (CA)</p>
<p>Express Scripts Unjust Enrichment</p>	<p>ESIUE5</p>	<p>All individuals in D.C.; Georgia; Hawaii; Illinois; Iowa; Kansas; Louisiana; Maine; Massachusetts; Mississippi; Missouri; Nevada; New Mexico;</p>	<p>Id.</p>	<p>Veronica Longwell (MA)</p>

Consumer Economic Loss Class Definitions and Exclusions Table

<p>Grouping No. 5</p>		<p>New York; North Carolina; Oklahoma; Oregon; South Carolina; South Dakota; Tennessee; Utah; and Puerto Rico, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Express Scripts, Inc., and manufactured, distributed, or sold by any of the Manufacturer Defendants.</p>		
<p>Kroger Unjust Enrichment Grouping No. 2</p>	<p>KROUE2</p>	<p>All individuals in Alabama; California; Colorado; Indiana; Montana, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant The Kroger, Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.</p>	<p>Any judge or magistrate presiding over this action, and members of their families;</p> <p>Defendants and affiliated entities, and their employees, officers, directors, and agents;</p> <p>Defendants’ legal representatives, assigns, and successors;</p> <p>Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero</p>	<p>Leland Gildner (IN)</p>

Consumer Economic Loss Class Definitions and Exclusions Table

			<p>Defendants’ valsartan-containing drugs dispensed by Kroger prior to May 1, 2018;</p> <p>All persons who properly execute and file a timely request for exclusion from any Court-approved class.</p>	
Optum Rx Unjust Enrichment Grouping No. 2	OPTUE2	<p>All individuals in Alabama; California; Colorado; Indiana; Montana, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant OptumRx, and manufactured, distributed, or sold by any of the Manufacturer Defendants.</p>	<p>Any judge or magistrate presiding over this action, and members of their families;</p> <p>Defendants and affiliated entities, and their employees, officers, directors, and agents;</p> <p>Defendants’ legal representatives, assigns, and successors;</p> <p>Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants’ valsartan-containing drugs dispensed by OptumRx prior to May 1, 2018;</p>	Charlie Johnston (CA)

Consumer Economic Loss Class Definitions and Exclusions Table

			All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Albertson’s Unjust Enrichment Grouping No. 2	ALBUE2	All individuals in Alabama; California; Colorado; Indiana; Montana, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Albertson’s LLC (including Sav-On), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	<p>Any judge or magistrate presiding over this action, and members of their families;</p> <p>Defendants and affiliated entities, and their employees, officers, directors, and agents;</p> <p>Defendants’ legal representatives, assigns, and successors;</p> <p>Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants’ valsartan-containing drugs dispensed by Albertson’s (including Sav-On) prior to May 1, 2018;</p> <p>All persons who properly execute and file a timely request for exclusion from any Court-approved class.</p>	Merilyn Andre (CA)

Consumer Economic Loss Class Definitions and Exclusions Table

WHOLESALE DEFENDANTS

Wholesaler Defendants Unjust Enrichment Claim

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
Wholesaler Defendants Unjust Enrichment State Grouping No. 1	WHUE1	All individuals in Texas, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was distributed in whole or in part by Defendants Cardinal Health, Inc., McKesson Corporation, and/or AmerisourceBergen Corporation, and manufactured in whole or in part by any of the Manufacturer Defendants.	<p>Any judge or magistrate presiding over this action, and members of their families;</p> <p>Defendants and affiliated entities, and their employees, officers, directors, and agents;</p> <p>Defendants’ legal representatives, assigns, and successors;</p> <p>Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants’ valsartan-containing drugs dispensed prior to May 1, 2018;</p> <p>All persons who properly execute and file a timely request for exclusion from any Court-approved class.</p>	Eric Erwin (TX); Brittney Means (TX); Jynona Gail Lee (TX); Samuel Cisneros (TX)
Wholesaler Defendants	WHUE2	All individuals in Alabama; Connecticut; and Montana, who,	Id.	Asha Lamy (AL); Sandra Kelly (AL); Peter O’Brien (CT)

Consumer Economic Loss Class Definitions and Exclusions Table

<p>Unjust Enrichment State Grouping No. 2</p>		<p>since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was distributed in whole or in part by Defendants Cardinal Health, Inc., McKesson Corporation, and/or AmerisourceBergen Corporation, and manufactured in whole or in part by any of the Manufacturer Defendants.</p>		
<p>Wholesaler Defendants Unjust Enrichment State Grouping No. 3</p>	<p>WHUE3</p>	<p>All individuals in Arizona; Arkansas; Maryland; Minnesota; Rhode Island; Vermont; and Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was distributed in whole or in part by Defendants Cardinal Health, Inc., McKesson Corporation, and/or AmerisourceBergen Corporation, and manufactured in whole or in part by any of the Manufacturer Defendants.</p>	<p>Id.</p>	<p>Jennifer Johnson (MN)</p>
<p>Wholesaler Defendants Unjust</p>	<p>WHUE4</p>	<p>All individuals in Alaska; Idaho; Nebraska; New Jersey; North Dakota; Pennsylvania; Virginia;</p>	<p>Id.</p>	<p>Marzanna Glab (NJ); Antoinette Sims (NJ); James Lawson (NJ); James Childs (NJ); Radhakrishna</p>

Consumer Economic Loss Class Definitions and Exclusions Table

<p>Enrichment State Grouping No. 4</p>		<p>and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was distributed in whole or in part by Defendants Cardinal Health, Inc., McKesson Corporation, and/or AmerisourceBergen Corporation, and manufactured in whole or in part by any of the Manufacturer Defendants.</p>		<p>Shetty (NJ); Lawrence Semmel (PA); Robin Roberts (VA); Mary McLean (VA); Cheryl Mullins (VA)</p>
<p>Wholesaler Defendants Unjust Enrichment State Grouping No. 5</p>	<p>WHUE5</p>	<p>All individuals in D.C.; Georgia; Hawaii; Illinois; Iowa; Kansas; Louisiana; Maine; Massachusetts; Mississippi; Missouri; Nevada; New Mexico; New York; North Carolina; Oklahoma; Oregon; South Carolina; South Dakota; Tennessee; Utah; and Puerto Rico, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was distributed in whole or in part by Defendants Cardinal Health, Inc., McKesson Corporation, and/or AmerisourceBergen Corporation,</p>	<p>Id.</p>	<p>Lubertha Powell (GA); Marlin Anderson (IL); Joseph Kessinger (KS); Talsie Neal (LA); Sandy Bell (LA); Estate of Linda Crocker (ME); Veronica Longwell (MA); Flora McGilvery (MS); Billy Joe Bruner (NM); Alphonse Borkowski (NY); John Duffy (NY); Gerald Nelson (NY); Joseph Cacaccio (NY); Gary Burnett (NC); Miranda Dudley (NC)</p>

Consumer Economic Loss Class Definitions and Exclusions Table

		and manufactured in whole or in part by any of the Manufacturer Defendants.		
Wholesaler Defendants Unjust Enrichment State Grouping No. 6	WHUE6	All individuals in California; Colorado; Delaware; Florida; Indiana; Kentucky; and Ohio, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was distributed in whole or in part by Defendants Cardinal Health, Inc., McKesson Corporation, and/or AmerisourceBergen Corporation, and manufactured in whole or in part by any of the Manufacturer Defendants.	Id.	Jay Meader (CA); Mark Hays (CA); Marilyn Andre (CA); Charlie Johnston (CA); Ron Molinaro (FL); Estate of Elenora Deutenberg/Feijoo (FL); Brian Wineinger (IN); Leland Gildner (IN); Glenda Cooper (KY); Dennis Kaplan (OH)

Exhibit B

Medical Monitoring
Class/ Subclass
Definitions

23(b)(3) Medical Monitoring Independent Claim Class

All individuals residing in Alaska; Arizona; Arkansas; California; Colorado; District of Columbia; Florida; Hawaii; Idaho; Maine; Massachusetts; Minnesota; Montana; New Mexico; Pennsylvania; South Dakota; Utah; West Virginia; and Wyoming and who consumed a sufficiently high Lifetime Cumulative Threshold of NDMA or NDEA, in generic valsartan-containing drugs manufactured by or for Defendants and marketed in the United States and its territories and possessions, at least since January 1, 2012. Excluded from this Class are the following: (i) Defendants and their subsidiaries and affiliates; (ii) All persons who make a timely election to be excluded from the Classes; (iii) Governmental entities; and (iv) Any judicial officers who preside over this case and their immediate family members. Also excluded from the Classes are those consumers of Valsartan-Containing Drugs who have been diagnosed with cancers allegedly as a result of taking Defendants' Valsartan-Containing Drugs containing NDMA or NDEA.

23(b)(2) Medical Monitoring (Physical Injury Required) Remedy Subclass

All individuals residing in Alabama; Connecticut; Delaware; Georgia; Illinois; Iowa; Kentucky; Louisiana; Michigan; Nebraska; Oklahoma; Oregon; and Wisconsin who consumed a sufficiently high Lifetime Cumulative Threshold of NDMA or NDEA, in generic valsartan-containing drugs manufactured by or for Defendants and marketed in the United States and its territories and possessions, at least since January 1, 2012. Excluded from this Class are the following: (i) Defendants and their subsidiaries and affiliates; (ii) All persons who make a timely election to be excluded from the Classes; (iii) Governmental entities; and (iv) Any judicial officers who preside over this case and their immediate family members. Also excluded from the Classes are those consumers of Valsartan-Containing Drugs who have been diagnosed with cancers allegedly as a result of taking Defendants' Valsartan-Containing Drugs containing NDMA or NDEA.

23(b)(2) Medical Monitoring (Physical Injury Not Required) Remedy Subclass

All individuals residing in California; District of Columbia; Guam; Indiana; Kansas; Maryland; Missouri; Nevada; New Jersey; New York; Ohio; Puerto Rico and other Federal territories; Rhode Island; South Carolina; Tennessee; Texas; Vermont; Virgin Islands; Virginia; and Washington who consumed a sufficiently high Lifetime Cumulative Threshold of NDMA or NDEA, in generic valsartan-containing drugs manufactured by or for Defendants and marketed in the United States and its territories and possessions, at least since January 1, 2012. Excluded from this Class are the following: (i) Defendants and their subsidiaries and affiliates; (ii) All persons who make a timely election to be excluded from the Classes; (iii) Governmental entities; and (iv) Any judicial officers who preside over this case and their immediate family members. Also excluded from the Classes are those consumers of Valsartan-Containing Drugs who have

been diagnosed with cancers allegedly as a result of taking Defendants' Valsartan-Containing Drugs containing NDMA or NDEA.