

James E. Cecchi  
CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO  
5 Becker Farm Road  
Roseland, NJ 07068  
(973) 994-1700

Hannah Ross  
James A. Harrod  
Jai K. Chandrasekhar  
James M. Fee  
BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP  
1251 Avenue of the Americas  
New York, NY 10020  
(212) 554-1400

*Lead Counsel, Interim Class Counsel, and  
Counsel for Plaintiffs AirConditioning and  
Refrigeration Industry Health and Welfare  
Trust Fund, Fire and Police Health Care  
Fund, San Antonio, and Plumbers Local  
Union No. 1 Welfare Fund*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC. THIRD-PARTY  
PAYOR LITIGATION

Civil Action No. 3:16-cv-3087-MAS-LHG

District Judge Michael A. Shipp

Magistrate Judge Lois H. Goodman

Special Master Dennis M. Cavanaugh,  
U.S.D.J. Ret.

**NOTICE OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF  
SETTLEMENTS AND APPROVAL OF PLAN OF ALLOCATION**

To: All persons on ECF service list

**PLEASE TAKE NOTICE** that on December 2, 2021, at 10:00 a.m., either in Courtroom  
1 of the United States District Court for the District of New Jersey, Clarkson S. Fisher Building &

U.S. Courthouse, 402 E. State St., Trenton, NJ 08608, or by telephone or videoconference (in the discretion of the Court), Plaintiffs Air Conditioning and Refrigeration Industry Health and Welfare Trust Fund, Fire and Police Health Care Fund, San Antonio, Plumbers Local Union No. 1 Welfare Fund, New York Hotel Trades Council & Hotel Association of New York City, Inc., and the Detectives Endowment Association of New York City (collectively, “Plaintiffs”), by and through their undersigned counsel, will and hereby do move the Court, before the Court-appointed Special Master, the Honorable Dennis M. Cavanaugh, for orders granting Plaintiffs’ Motion for Final Approval of Settlements and Approval of Plan of Allocation under Federal Rule of Civil Procedure 23 which will: (i) grant final approval of the two proposed settlements of the above-captioned class action on the terms set forth in the Stipulation and Agreement of Settlement with Valeant Pharmaceuticals International, Inc., dated August 4, 2021 (ECF No. 194-2) and the Stipulation and Agreement of Settlement with the Philidor Defendants, dated August 4, 2021 (ECF No. 195-2); and (ii) approve the proposed plan for allocating the net proceeds of the Settlement to the Settlement Class.

PLEASE TAKE FURTHER NOTICE that, in support of the Motion, the undersigned intend to rely on the accompanying Memorandum of Law and the accompanying Joint Declaration of James A. Harrod and James E. Cecchi and exhibits attached thereto, and the papers and pleadings filed in this Action, the arguments of counsel, and any other matters properly before the Court.

PLEASE TAKE FURTHER NOTICE that, proposed orders granting the relief requested herein will be submitted in connection with Plaintiffs’ reply submission, which will be filed no later than November 24, 2021, pursuant to the Court’s August 17, 2021 Orders Preliminarily Approving Settlement and Providing for Notice (ECF Nos. 196, 197).

Dated: October 28, 2021

**CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO, P.C.**

/s/James E. Cecchi

James E. Cecchi  
5 Becker Farm Road  
Roseland, NJ 07068  
Telephone: (973) 994-1700  
Facsimile: (973) 994-1744  
JCecchi@carellabyrne.com

***Lead Counsel, Interim Class Counsel, and  
Local Counsel for Plaintiffs AirConditioning  
and Refrigeration Industry Health and  
Welfare Trust Fund, Fire and Police Health  
Care Fund, San Antonio, and Plumbers  
Local Union No. 1 Welfare Fund***

**BERNSTEIN LITOWITZ BERGER &  
GROSSMANN LLP**

Hannah Ross  
James A. Harrod  
Jai K. Chandrasekhar  
James M. Fee  
1251 Avenue of the Americas  
New York, NY 10020  
Telephone: (212) 554-1400  
Facsimile: (212) 554-1444

***Lead Counsel, Interim Class Counsel, and  
Counsel for Plaintiffs AirConditioning and  
Refrigeration Industry Health and Welfare  
Trust Fund, Fire and Police Health Care  
Fund, San Antonio, and Plumbers Local  
Union No. 1 Welfare Fund***

**BARRACK, RODOS & BACINE**

Jeffrey W. Golan  
Jeffrey A. Barrack  
3300 Two Commerce Square  
2001 Market Street  
Philadelphia, PA 19103  
Telephone: (215) 963-0600

*Counsel for Plaintiff the Detectives  
Endowment Association of New York City*

**COHEN MILSTEIN SELLERS & TOLL  
PLLC**

Julie Goldsmith Reiser  
S. Douglas Bunch  
1100 New York Ave, N.W.  
East Tower, Suite 500  
Washington, DC 20005  
Telephone: (202) 408-4600

- and -

Christopher Lometti  
Joel P. Laitman  
88 Pine Street, 14th Floor  
New York, New York 10005  
Telephone: (212) 838-7797

*Counsel for Plaintiff New York Hotel Trades  
Council & Hotel Association of New York  
City, Inc. Health Benefits Fund*

#3061722

**CERTIFICATION OF SERVICE**

I hereby certify that on October 28, 2021, I caused a true and correct copy of the foregoing Notice of Plaintiffs' Motion for Final Approval of Settlements and Approval of Plan of Allocation to be electronically filed with the Clerk of the Court using the ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: October 28, 2021

*s/ James E. Cecchi*  
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James E. Cecchi  
**CARELLA, BYRNE, CECCHI, OLSTEIN,  
BRODY & AGNELLO, P.C.**  
5 Becker Farm Road  
Roseland, NJ 07068  
Telephone: (973) 994-1700  
Facsimile: (973) 994-1744  
jcecchi@carellabyrne.com

*Lead Counsel for Plaintiffs and  
the Settlement Class*