

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

IN RE TEVA SECURITIES LITIGATION	:	No. 3:17-cv-00558 (SRU)
	:	
THIS DOCUMENT RELATES TO:	:	All Class Actions
	:	

**[PROPOSED] ORDER AUTHORIZING
RESERVE DISTRIBUTION OF THE NET SETTLEMENT FUND**

Class Representatives Ontario Teachers’ Pension Plan Board and Anchorage Police & Fire Retirement System (together, “Class Representatives”), moved this Court for an order granting their Motion for Reserve Distribution of the Net Settlement Fund in the above-captioned consolidated class action (the “Action”). Having reviewed and considered all the materials and arguments submitted in support of the motion, including the Declaration of Stephanie Amin-Giwner in Support of Class Representatives’ Motion for Reserve Distribution of the Net Settlement Fund (the “Amin-Giwner Declaration”), IT IS HEREBY ORDERED THAT:

1. This Order incorporates by reference the definitions in the Stipulation of Settlement dated January 18, 2022 (ECF 919-2) and Initial Distribution Order (ECF 999), and all terms used herein shall have the same meanings as set forth therein, unless otherwise set forth herein.
2. This Court has jurisdiction over the subject matter of the Action and over all parties to the Action, including all Settlement Class Members.
3. The administrative recommendations of the Court-approved Claims Administrator, Epiq, to accept the claims deemed acceptable in whole or in part, listed in Exhibits A-1, B, C-1, D, and E-1, to the Amin-Giwner Declaration, and the claims in Exhibit F to the Amin-Giwner Declaration with a positive Recognized Claim, are adopted.

4. The Claims Administrator's administrative recommendations to reject the claims that Epiq has wholly rejected, listed in Exhibits A-2, C-2, E-2, and G to the Amin-Giwner Declaration, and the claims in Exhibit F to the Amin-Giwner Declaration with no Recognized Claim, are adopted.

5. The proposed plan for the reserve distribution of the Net Settlement Fund (the "Reserve Distribution Plan") as set forth in the Amin-Giwner Declaration is APPROVED. Accordingly:

i. Epiq will calculate award amounts to all Authorized Claimants (whether pursuant to the Initial Distribution Order or Reserve Distribution Order) by calculating their *pro rata* share of the Net Settlement Fund at the time of the Initial Distribution, in accordance with the Plan of Allocation, based on the (a) amount of the Authorized Claimant's Recognized Claim divided by (b) the total of Recognized Claims of all Authorized Claimants, multiplied by (c) the total amount in the Net Settlement Fund at the time of the Initial Distribution after deducting any further payments approved by the Court (including payments authorized by the Reserve Distribution Order), taxes, the costs of preparing appropriate tax returns, and any escrow fees;

ii. Epiq will eliminate from the Reserve Distribution any Authorized Claimant whose *pro rata* share of the Net Settlement Fund as calculated under subparagraph (i) above is less than \$10.00. Such claimants will not receive any distribution from the Net Settlement Fund and Epiq will send letters to those Authorized Claimants (if not already sent) advising them of that fact.

iii. Pursuant to the Initial Distribution Order, Epiq will eliminate from the Reserve Distribution all Claims Paid in Full.

iv. After eliminating claimants who would have received less than \$10.00 and all Claims Paid in Full, Epiq will calculate the *pro rata* share for each remaining Authorized Claimant pursuant to the calculations described in subparagraph (i) above (the “Distribution Amount”).

v. Each remaining Authorized Claimant will receive the Distribution Amount, less any amount previously distributed to such Authorized Claimant pursuant to the Initial Distribution Order.

vi. In order to encourage Authorized Claimants to promptly deposit their payments, all Reserve Distribution checks will bear the following notation: “DEPOSIT PROMPTLY, VOID AND SUBJECT TO RE-DISTRIBUTION IF NOT NEGOTIATED WITHIN 90 DAYS OF ISSUE DATE.”

vii. Authorized Claimants who do not cash their Reserve Distribution checks within the time allotted will irrevocably forfeit all recovery from the Settlement. The funds allocated to all such stale-dated checks will be available to be re-distributed to other Authorized Claimants in one or more follow-up distributions.

6. All persons involved in the review, verification, calculation, tabulation, or any other aspect of the processing of the claims submitted herein, or otherwise involved in the administration or taxations of the Net Settlement Fund, including Class Representatives, Class Counsel, the Claims Administrator, The JNL Firm, LLC (“JNL”), the Escrow Agents or any other agent designated by Class Counsel, are released and discharged from any and all claims arising out of such involvement, and all Settlement Class Members are barred from making any further claim against the Net Settlement Fund or the Released Parties, including the entities named in this Paragraph.

7. The Claims Administrator's estimated fees and expenses for its work in connection with the Reserve Distribution are approved, and Class Counsel is directed to pay the Claims Administrator \$29,372.96 out of the Settlement Fund.

8. JNL's fees incurred in connection with its ongoing work to provide reasonable assurance that the settlement administration process is fair and accurate and facilitate the conclusion of the administration are approved, and Class Counsel is directed to pay JNL \$19,125.00 out of the Settlement Fund.

9. This Court retains jurisdiction to consider any further applications concerning the administration of the settlement, and such other and further relief as this Court deems appropriate.

IT IS SO ORDERED.

Dated: _____, 2023

Stefan R. Underhill
Senior United States District Judge
District of Connecticut