

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

STATE OF CALIFORNIA,

Plaintiff,

v.

**TEVA PHARMACEUTICAL
INDUSTRIES, LTD., et al.**

Defendants.

CIVIL ACTION

Case No. 19-3281

**PLAINTIFF STATE OF CALIFORNIA'S MOTION
FOR FINAL APPROVAL OF THE CONSUMER SETTLEMENT
AND ENTRY OF THE STIPULATED STATE INJUNCTION ORDER**

Pursuant to Rule 7(b) of the Federal Rules of Civil Procedure and Rules 7.1 and 7.4 of the Local Rules of Civil Procedure, Plaintiff State of California (“California”) hereby moves this Court for final approval of the Consumer Settlement set forth under Sections II, III, IV, VIII, IX, and XXIII of the Parties’* Settlement Agreement, and for entry of the stipulated State Injunction Order stated under Section V of said agreement (the “Motion”). The Parties’ Consumer Settlement is presented to the Court for final approval pursuant to California law authorizing California’s Attorney General to bring *parens patriae* actions on behalf of California’s natural persons injured by the alleged violation of state antitrust law. Cal Bus. & Prof. Code § 16760. The stipulated State Injunction Order is presented for court entry pursuant to Local Rule 7.4.

* The operative Settlement Agreement was entered into between the State of California, on the one hand, and Teva Pharmaceutical Industries Ltd., on the other, on behalf of itself and its wholly-owned subsidiaries Cephalon, Inc., Teva Pharmaceuticals USA, Inc., and Barr Pharmaceuticals, Inc. (collectively, “Teva”).

This Motion is supported by the accompanying Memorandum, Declarations of Pamela Pham, Eric Miller and Harry Snyder, and all attachments submitted therewith. The Motion is also filed in accordance with Section VIII of the Settlement Agreement, which states in pertinent part that the parties “shall use their best efforts to effectuate this Settlement Agreement and its purpose, including jointly seeking any orders and final judgment necessary to effectuate the injunctive terms set forth in Section V and the release of *parens patriae* claims set forth in Section VI.” Teva does not oppose this Motion. A proposed form of Order is also attached.

Dated: January 24, 2020

Respectfully submitted,

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/s/ PAMELA PHAM

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