

SUN SETTLEMENT AGREEMENT

TECHNICAL CORRECTIONS MEMORANDUM

SEPTEMBER 4, 2025

The Sun Settlement Agreement, dated April 4, 2025 (the “Agreement”), permits the Plaintiffs’ Executive Committee, the Executive Committee of the State Attorneys General, and Sun to meet and confer and make technical corrections to the Agreement as they agree are appropriate. *See* Agreement at § XIII.U. This memorandum summarizes the technical corrections issued on September 4, 2025.

The Settlement Agreement

Correction made to Section IV.B. to permit Sun to pay the Implementation Administrator from interest accrued on the segregated bank accounts prior to the transfer of funds into the Settlement Fund. Section IV.B now states: “Sun shall provide proof to the Enforcement Committee of the deposits required by Section IV.D.1 by the Deposit Date. Sun shall not remove any money from the segregated bank accounts, except as provided by Section IV.F, Section IV.H, and Section VIII.A.”