

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

All Cases Noted on Attached Appendix A

MDL No. 2804

Case No. 1:17-md-2804

JUDGE DAN AARON POLSTER

**MASTER STIPULATION AND ORDER DISMISSING WITH PREJUDICE CLAIMS
PURSUANT TO APOTEX STATES SETTLEMENT AGREEMENT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Plaintiff Subdivisions identified in Appendix A (collectively, the “Dismissing Plaintiffs”) and Defendant Apotex Corp. (collectively and together with the Released Entities¹, the “Apotex Entities”) that, pursuant to the election of each Dismissing Plaintiff to participate in the Apotex States Settlement Agreement dated April 4, 2025, as amended, which is binding on the Dismissing Plaintiffs and Apotex Corp., and which has an Effective Date of January 29, 2026, all claims of each Dismissing Plaintiff against any Apotex Entity, including any entity identified on the attached Appendix C, are hereby **DISMISSED WITH PREJUDICE**, with each party to bear its own costs. The Court shall retain jurisdiction with respect to the Apotex States Settlement Agreement to the extent provided under that Agreement.²

¹ All capitalized terms not defined herein shall have the meaning set forth in the Apotex States Settlement Agreement dated as of April 4, 2025, as amended, a copy of which is attached as Appendix B. The Released Entities are each and every entity that is a “Released Entity” as set forth in Section I.GGG and Exhibit J thereto.

² To the extent any Plaintiff Subdivision is inadvertently included on Appendix A, the Court retains jurisdiction to hear those disputes. In advance of raising any such issue with the Court, the Plaintiff Subdivision must meet and confer with defense counsel and Plaintiffs’ Liaison Counsel.

Dated: February 20, 2026

Respectfully submitted,

Agreed as to form and substance:

/s/Jayne Conroy
Jayne Conroy
SIMMONS HANLY CONROY
112 Madison Avenue, 7th Floor
New York, NY 10016
(212) 784-6400
(212) 213-5949 (fax)
jconroy@simmonsfirm.com

/s/Joseph F. Rice
Joseph F. Rice
MOTLEY RICE LLC
28 Bridgeside Blvd.
Mt. Pleasant, SC 29464
(843) 216-9000
(843) 216-9290 (Fax)
jrice@motleyrice.com

/s/Paul T. Farrell, Jr.
Paul T. Farrell, Jr., Esq.
FARRELL & FULLER LLC
270 Munoz Rivera Ave., Suite 201
San Juan, PR 00918
(304)654-8281
paul@farrellfuller.com

Plaintiffs' Co-Lead Counsel

/s/Peter H. Weinberger
Peter H. Weinberger (0022076)
SPANGENBERG SHIBLEY & LIBER
1001 Lakeside Avenue East, Suite 1700
Cleveland, OH 44114
(216) 696-3232
(216) 696-3924 (Fax)
pweinberger@spanglaw.com

Plaintiffs' Liaison Counsel

/s/ James W. Matthews

James W. Matthews

Katy E. Koski

FOLEY & LARDNER LLP

111 Huntington Ave, Suite 2500

Boston, MA 02199

(617) 341-4000

(617) 341-4001 (fax)

Attorneys for Defendant Apotex Corp.

SO ORDERED this 20th day of February, 2026.

s/Dan Aaron Polster

Hon. Dan Aaron Polster

United States District Judge

APPENDIX A

APPENDIX A

Case Number	Subdivision Name	State	Legal Representation
1:19-op-45176	Pulaski County	GA	Blasingame, Burch, Garrard & Ashley, P.C.
1:19-op-45195	Stephens County	GA	Blasingame, Burch, Garrard & Ashley, P.C.
1:19-op-45499	City of Inez	KY	Bryant Law Center
1:19-op-45559	City of Paintsville	KY	Bryant Law Center
1:19-op-45577	Franklin County	MS	Levin, Papantonio, Proctor, Buchanan, O'Brien, Barr and Mougey, P.A.
1:19-op-45655	Lycoming County	PA	Brindisi, Murad & Brindisi Pearlman
1:19-op-45721	City of St. Albans	VT	Levin, Papantonio, Proctor, Buchanan, O'Brien, Barr and Mougey, P.A.
1:19-op-45742	City of Fairfield	OH	Levin, Papantonio, Proctor, Buchanan, O'Brien, Barr & Mougey, P.A.
1:19-op-45759	Bertie County	NC	Levin, Papantonio, Proctor, Buchanan, O'Brien, Barr and Mougey, P.A.
1:20-op-45296	New Madrid County	MO	Theodora Oringer PC

APPENDIX C

APPENDIX C

**Entities to be Dismissed Pursuant to Master Stipulation and [Proposed] Order Dismissing
with Prejudice Claims Pursuant to Apotex States Settlement Agreement**

Apotex Corp.

Apotex Corporation

Apotex Inc.

Apotex, Inc.

Aveva Drug Delivery Systems, Inc.