

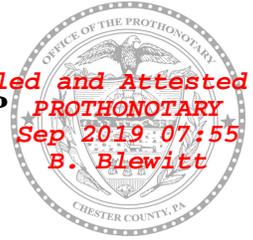
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*Filed and Attested by*  
**PROTHONOTARY**  
*16 Sep 2019 07:55 PM*  
**B. Blewitt**



*Counsel for Plaintiff*

**IN THE COURT OF COMMON PLEAS OF  
CHESTER COUNTY, PENNSYLVANIA**

PUBLIC EMPLOYEES' RETIREMENT  
SYSTEM OF MISSISSIPPI, Individually and  
on Behalf of All Others Similarly Situated,

Plaintiff,

vs.

ENDO INTERNATIONAL PLC, et al.,

Defendants.

CIVIL ACTION

Case No. 2017-02081-MJ

**PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION  
SETTLEMENT AND PLAN OF ALLOCATION**

1. Pursuant to Pa. R. Civ. P. 1714(a), plaintiff Public Employees' Retirement System of Mississippi ("Plaintiff" or "Mississippi PERS"), on behalf of itself and all other members of the Settlement Class, hereby moves for entry of the proposed Final Order and Judgment, which will: (i) grant final approval to the proposed settlement of the above-captioned class action (the "Action"), as set forth in the Stipulation and Agreement of Settlement, dated as of June 27, 2019 (the "Stipulation");<sup>1</sup> and (ii) approve the proposed plan of allocation for distributing the proceeds of the Settlement to eligible claimants.

2. Plaintiff also moves, pursuant to Pa. R. Civ. P. 1702, 1708 & 1709, for certification of the Settlement Class and the appointment of Labaton Sucharow LLP as Class Counsel, Goldman Scarlato & Penny, P.C. as Liaison Counsel, and Mississippi PERS as Class Representative.

3. The Court has scheduled a hearing on the motion for October 21, 2019 at 1:30 p.m.

4. The motion is supported by the accompanying memorandum of law and the Declaration of Serena P. Hallowell in Support of (I) Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation and (II) Plaintiff's Counsel's Motion for an Award of Attorneys' Fees and Payment of Expenses, with annexed exhibits, filed herewith.

5. A proposed Final Order and Judgment, negotiated by the Parties as part of the Settlement, is also submitted herewith.

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<sup>1</sup> All capitalized terms not otherwise defined herein have the same meanings as set forth in the Stipulation, previously filed with the Court on June 28, 2019.

6. Defendants do not oppose the relief requested.

Dated: September 16, 2019

Respectfully submitted,

**GOLDMAN SCARLATO & PENNY, P.C.**

*/s/ Mark S. Goldman*

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**CERTIFICATE OF COMPLIANCE**

Pursuant to C.C.R.C.P. 208.2(d), I hereby certify that between September 13, 2019 and September 16, 2019, counsel for Plaintiff conferred with counsel for Defendants in respect to Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation. I have been advised that no Party opposes the relief sought in the proposed Judgment, the form of which was negotiated by the Parties. Members of the Settlement Class have until September 30, 2019 to object to the Settlement and Plan of Allocation.

*/s/ Mark S. Goldman*

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Mark S. Goldman