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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re Effexor XR Antitrust Litigation

This Document Relates to:

Direct Purchaser Actions

Master Docket No.

3:11-cv-05479 (PGS/JBD)

**DECLARATION OF PETER S. PEARLMAN IN SUPPORT OF  
DIRECT PURCHASER CLASS PLAINTIFFS' UNOPPOSED  
MOTION FOR CERTIFICATION OF A SETTLEMENT CLASS,  
APPOINTMENT OF LEAD CLASS COUNSEL, PRELIMINARY  
APPROVAL OF PROPOSED SETTLEMENT, APPROVAL OF THE  
FORM AND MANNER OF NOTICE TO THE CLASS AND  
PROPOSED SCHEDULE FOR A FAIRNESS HEARING**

I, Peter S. Pearlman, am an attorney duly authorized to practice law in the State of New Jersey and am admitted to practice before the United States District Court for the District of New Jersey. I am counsel for the Direct Plaintiff Class

Plaintiffs (“Plaintiffs”) in the above captioned litigation. I submit this declaration in support of Plaintiffs’ Unopposed Motion for Certification of a Settlement Class, Appointment of Lead Class Counsel, Preliminary Approval of Proposed Settlement, Approval of the Form and Manner of Notice to the Class and Proposed Schedule for a Fairness Hearing.

1. Attached as Exhibit 1 is a true and correct copy of Plaintiffs’ Settlement Agreement with Wyeth LLC, Wyeth Pharmaceuticals, Inc., Wyeth-Whitehall Pharmaceuticals LLC, and Wyeth Pharmaceuticals Company, dated March 21, 2024.

2. Attached as Exhibit 2 is a true and correct copy of Plaintiffs’ Proposed Plan of Allocation.

3. Attached as Exhibit 3 is a true and correct copy of the Declaration of Jeffrey J. Leitzinger, Ph.D. Related to Proposed Allocation Plan and Net Settlement Fund Allocation, dated April 8, 2024.

4. Attached as Exhibit 4 is a true and correct copy of the Declaration of William W. Wickersham of RG/2 Claims Administration in Support of Direct Purchaser Class Plaintiffs’ Unopposed Motion for Certification of a Settlement Class, Appointment of Lead Class Counsel, Preliminary Approval of Proposed Settlement, Approval of the Form and Manner of Notice to the Class and Proposed Schedule for a Fairness Hearing, dated April 9, 2024.

5. Attached as Exhibit 5 is a true and correct copy of the Declaration of Jeffrey J. Leitzinger, Ph.D. Regarding Certification of the Proposed Settlement Class, dated April 8, 2024 [FILED UNDER SEAL].

I declare under penalty of perjury that the forgoing is true and correct. Executed this 9th day of April, 2024.

Respectfully submitted,

*/s/Peter S. Pearlman*

Peter S. Pearlman