

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE INTUNIV ANTITRUST  
LITIGATION

This Document Relates to:  
*Direct Purchaser Actions*

Civil Action No. 16-cv-12653-ADB (Lead)

**DIRECT PURCHASER CLASS PLAINTIFFS' UNOPPOSED MOTION TO  
DISTRIBUTE NET SETTLEMENT FUND**

Plaintiffs Meijer, Inc., Meijer Distribution, Inc, and QK Healthcare Inc., individually and on behalf of the certified direct purchaser class, respectfully move the Court for entry of an Order:

1. Approving the determinations of the Court-approved settlement administrator, A.B. Data, Ltd., concerning the claims submitted in connection with the direct purchaser class's settlement with defendants Shire plc, Shire LLC, and Shire U.S., Inc.;
2. Approving and authorizing payments totaling \$46,843.56 from the settlement fund to A.B. Data and Econ One, the economic consultant retained by lead class counsel to assist A.B. Data with claims administration, for fees and expenses incurred or to be incurred in connection with the settlement administration process;
3. Approving and authorizing the distribution of the net settlement fund, less administration-related costs and tax payments for the 2024 and 2025 tax years, plus any interest accrued on that amount, *pro rata* to the 47 approved claimants; and
4. Finally and forever barring any further or additional claims against the net settlement fund.

In support of this motion, the direct purchasers rely on the accompanying memorandum and declaration of Eric Miller. A proposed order is submitted herewith.

Pursuant to Local Rule 7.1, class counsel have conferred with counsel for Shire, and Shire has confirmed that it does not oppose this motion.

Dated: April 14, 2025

Respectfully submitted,

/s/ Thomas M. Sobol

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*Additional Counsel for the Direct Purchaser Class*

**CERTIFICATE OF SERVICE**

I hereby certify that, on this date, the foregoing document was served by filing it on the Court's CM/ECF system, which will deliver notification of filing to all counsel of record.

Dated: April 14, 2025

/s/ Thomas M. Sobol  
Thomas M. Sobol