

If you purchased and paid for brand Adderall XR[®] any time from January 1, 2007 to April 11, 2016, your rights may be affected and you could get a payment from a class action settlement.

A federal court authorized this Notice. It is not a solicitation from a lawyer.

- A settlement has been reached with Shire U.S. Inc. and Shire LLC (“Shire”) in a class action lawsuit about whether it acted unlawfully to delay and limit the availability of generic versions of Adderall XR[®].
- Shire has agreed to settle the lawsuit for \$14,750,000. Those included can receive up to \$16 for each eligible Adderall XR[®] prescription purchased.
- You may be included in this settlement if you purchased and paid for some or all of the purchase price of Adderall XR[®] (brand name only, for personal or household use) in Alabama, Arizona, California, Delaware, the District of Columbia, Florida, Georgia, Idaho, Illinois, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Utah, Vermont, West Virginia, or Wisconsin between January 1, 2007 to April 11, 2016 (the “Settlement Class”).
- Your rights are affected whether you act or don’t act. Read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:	
SUBMIT A CLAIM FORM DEADLINE: OCTOBER 7, 2016	This is the only way you can receive a settlement payment. If you submit a Claim Form, you will give up the right to sue Shire in a separate lawsuit about the claims this settlement resolves.
ASK TO BE EXCLUDED DEADLINE: OCTOBER 7, 2016	This is the only option that allows you to sue, continue to sue, or be part of another lawsuit against Shire related to the legal claims this settlement resolves. However, you will give up the right to get a payment from this settlement. If you do not exclude yourself from this settlement, you will be bound by its terms if the settlement is approved by the Court.
OBJECT TO THE SETTLEMENT DEADLINE: OCTOBER 7, 2016	If you do not exclude yourself from the settlement, you may object to it by writing to the Court about why you don’t like the settlement.
GO TO A HEARING ON NOVEMBER 9, 2016	You may object to the settlement and ask the Court for permission to speak at the Fairness Hearing about your objection.
DO NOTHING	If you are included in the Settlement Class, you are automatically part of the settlement. If you do nothing, you will not get a payment from this settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against Shire about the legal claims resolved by this settlement.

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the settlement.

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BASIC INFORMATION

1. Why was this Notice issued?

A federal court authorized this Notice because you have a right to know about the proposed settlement of this class action lawsuit and about all of your options before the Court decides whether to grant final approval to the settlement. This Notice explains the lawsuit, the settlement, your legal rights, what benefits are available, and who can get them.

Judge Joan A. Lenard of the United States District Court for the Southern District of Florida is overseeing this class action. The case is known as *Barba v. Shire U.S., Inc.*, Case No. 1:13-cv-21158. The people that filed this lawsuit are called the “Plaintiffs” and the companies they sued, Shire U.S. Inc. and Shire LLC are called the “Defendants” or “Shire.”

This settlement will also resolve three similar lawsuits currently pending in other courts. Those lawsuits are: (1) *Allyson Netwall v. Shire U.S. Inc. and Shire, LLC*, E.D. Pa., Case No. 13-cv-1669 (“Netwall Action”); (2) *Samantha Peluso v. Shire U.S. Inc. and Shire, LLC*, D. N.J., Case No. 15-cv-72259 (“Peluso Action”); and (3) *Jessica Hartenstine, Jayme Dearing, and Rosemary Autrey v. Shire U.S. Inc. and Shire, LLC*, D. Mass., Case No. 15-cv-14181 (“Hartenstine Action”).

2. What is this lawsuit about?

The lawsuit is about the price and availability of brand Adderall XR[®]. Plaintiffs claim that Shire delayed and lessened the availability of less expensive generic versions of Adderall XR[®] by: (1) filing false patent litigations; (2) filing a false Citizen Petition to delay the Food and Drug Administration’s approval of generic versions; (3) entering into financial agreements with generic drug manufacturers; (4) creating a shortage of generic versions by supplying less than agreed to; and (5) paying higher rebates to managed care organizations that agreed to the preferred placement of brand Adderall XR[®] instead of generic versions.

The Defendants deny all of the claims and allegations made in the lawsuit. Shire agreed to this settlement to avoid the cost and risk of a trial.

3. What is a class action?

In a class action, one or more people or entities called Class Representatives or Plaintiffs (in this case Monica Barba, Jonathan Reisman, Karen DeReus, Rayna DeReus, Jodi Leit, Mindi Leit, and Barrie Shanahan and Brian Shanahan (on behalf of their minor child)) sue on behalf of other people or entities with similar claims. The people and entities included in the class action are called a Class or Class Members. One court resolves the issues for all Class Members, except for those who exclude themselves from the Class.

4. Why is there a settlement?

The Court did not decide in favor of the Plaintiffs or Defendants. Instead, the Plaintiffs and Defendants agreed to a settlement. This way, they avoid the cost and burden of a trial and the people affected can get benefits. The Class Representatives and their attorneys think the settlement is best for all Settlement Class Members.

WHO IS INCLUDED IN THE SETTLEMENT

5. How do I know whether I am part of the settlement?

The settlement includes all persons who purchased and paid for some or all of the purchase price of Adderall XR[®] (brand name only, for personal or household use) from January 1, 2007 to April 11, 2016 in the District of Columbia, Alabama, Arizona, California, Delaware, Florida, Georgia, Idaho, Illinois, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Utah, Vermont, West Virginia, or Wisconsin.

If your insurance plan requires you to pay a flat co-payment (the same fixed dollar-amount whether you purchased brand Adderall XR[®] or generic equivalent) you are not included in the Settlement Class.

6. Are there exceptions to being included?

Yes. The settlement does not include: (1) third-party payors; (2) persons and entities who purchased Adderall XR[®] directly from Shire; (3) persons and entities who purchased Adderall XR[®] only for resale purposes; (4) “Flat co-pay” or “Cadillac Plan” customers who only made fixed dollar-amount co-payments that did not vary between Adderall XR[®] and its generic equivalents; (5) patients with insurance coverage that provided for a flat-rate co-pay provision; (6) governmental entities; (7) Shire, its officers, directors, affiliates, legal representatives, employees, predecessors, successors, subsidiaries, affiliates and assigns, and entities in which Shire has a controlling interest; and (8) the judges, justices, magistrates or judicial officers presiding over this matter.

7. What if I am still not sure whether I am part of the settlement?

If you are not sure whether you are included, call 1-877-369-4085, go to www.AdderallXRSettlement.com or write to one of the lawyers listed in Question 15 below.

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

8. What does the settlement provide?

A \$14,750,000 Settlement Fund has been established by Shire in this settlement. After deducting Court-approved attorneys' fees, costs and expenses, service awards for the Class Representatives and related Plaintiffs, taxes, and the costs of settlement notice and administration, the balance (the "Net Settlement Fund") will be distributed to Settlement Class Members who submit a valid Claim Form. 74% of the Net Settlement Fund will be made available to Settlement Class Members who purchased Adderall XR[®] from January 1, 2007 through March 31, 2009 (the "pre-generic period") and 26% will be made available to Settlement Class Members who purchased Adderall XR[®] from April 1, 2009 through April 11, 2016 (the "post-entry period").

Any money remaining in the Net Settlement Fund after making payments to Settlement Class Members will be distributed to Children and Adults with Attention Deficit Disorders (C.H.A.D.D.). C.H.A.D.D. is a national non-profit organization that works to improve the lives of affected people through education, advocacy, and support.

9. How much will my payment be?

You can receive up to \$16 for each eligible branded Adderall XR[®] prescription purchased. Your share of the Net Settlement Fund will depend on: (1) when you purchased Adderall XR[®] (pre-generic period or post-entry period); (2) the amount you purchased; (3) the amount of money you paid for those purchases; and (4) the total amount of purchases made by other Settlement Class Members. All Settlement Class Members will receive their share of the Net Settlement Fund in proportion to their eligible purchases during the pre-generic period and post-entry period.

HOW TO GET A SETTLEMENT PAYMENT—SUBMITTING A CLAIM FORM

10. How do I get a payment?

You must complete and submit a claim form by **October 7, 2016**. Claim forms may be submitted online, via email to info@AdderallXRSettlement.com, or downloaded for printing and submission via U.S. Mail at www.AdderallXRSettlement.com. Claim forms are also available by calling 1-877-369-4085 or by writing to *Barba v. Shire U.S., Inc.* Settlement Administrator, P.O. Box 40007, College Station, TX 77842-4007.

11. When would I get my payment?

The Court will hold a Fairness Hearing at 2:30 p.m. on November 9, 2016 to decide whether to grant final approval to the settlement. If the Court approves the settlement, there may be appeals. It is always uncertain whether appeals will be filed and, if so, how long it will take to resolve them. The Net Settlement Fund will be distributed to Settlement Class Members as soon as possible, if and when the Court grants final approval to the settlement and after all appeals, if any, are resolved.

12. What if my name or address changes after I submit a claim form, but before I receive my payment?

If your name or address needs to be corrected, you must send a letter to the Settlement Administrator at *Barba v. Shire U.S., Inc.* Settlement Administrator, P.O. Box 40007, College Station, TX 77842-4007.

13. What rights am I giving up to get a payment and stay in the Settlement Class?

Unless you exclude yourself, you are staying in the Settlement Class. If the settlement is approved and becomes final, all of the Court's orders will apply to you and legally bind you. You won't be able to sue, continue to sue, or be part of any other lawsuit against Shire about the legal issues in this case, but you will be able to submit a claim form to receive a payment from this settlement. The rights you are giving up are called Released Claims.

14. What are the Released Claims?

Generally, if and when the settlement becomes final, Shire, its parents, subsidiaries, and affiliates, whether direct or indirect, the predecessors and successors of each of them, and their respective divisions, affiliates, joint ventures, stockholders, officers, directors, supervisory or advisory boards, insurers, general or limited liability partners, employees, agents, trustees, associates, attorneys or legal representatives (and the predecessors, heirs, executors, administrators, successors and assigns of each of the foregoing) ("the Released Parties"), shall be unconditionally, fully, and finally released and forever discharged from all manner of claims, debts, obligations, demands, actions, suits, causes of action, damages whenever incurred, liabilities of any nature whatsoever, including costs, expenses, penalties and attorneys' fees, known or unknown, suspected or unsuspected, accrued in whole or in part, in law or equity, that the Settlement Class Member (including any of their past, present, and future officers, directors, insurers, general or limited liability partners, divisions, stockholders, agents, attorneys, employees, legal representatives, trustees, parents, associates, affiliates, joint ventures, subsidiaries, heirs, executors, administrators, predecessors, successors and assigns, acting in their capacity as such) ("the Releasers"), whether or not they object to the Settlement and whether or not they make a claim or participate in the Settlement Fund, ever had, now has, or hereafter can, shall or may have, directly, representatively, derivatively or in any other capacity, arising out of or under the federal antitrust laws or under the antitrust, trade regulation, or consumer protection laws, and common law, of any of the following jurisdictions: the District of Columbia and the states of Alabama, Arizona, California, Delaware, Florida, Georgia, Idaho, Illinois, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska,

Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Utah, Vermont, West Virginia, and Wisconsin, and relating in any way to any conduct alleged or asserted in any complaints filed by Plaintiffs in this class action or any other complaint filed by Plaintiffs, including any alleged delay in the manufacture, marketing or sale of any generic, or authorized generic version of Adderall XR[®], or any alleged overcharges in co-pays for Adderall XR[®] or any generic versions, before the date the Settlement Agreement becomes final (the “Releases Claims”).

The specific claims you will be releasing are described in paragraph 1.8 of the Settlement Agreement, available at www.AdderallXRSettlement.com.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this case?

Yes. Judge Lenard appointed the law firms of Kanner & Whiteley, LLC, Golomb & Honik, P.C., Milstein Adelman Jackson Fairchild & Wade, LLP, and Ku & Mussman, P.A. to represent you and other Settlement Class Members as “Class Counsel.” These law firms and their lawyers are experienced in handling similar cases. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

16. How will the lawyers be paid?

Class Counsel will ask the Court for attorneys’ fees of up to 35% of the Settlement Fund (or \$5,162,500) and reimbursement of their costs. The Court may award less than these amounts. All of these amounts, as well as a total of \$35,000 as service awards to the Class Representatives Barba and Reisman, the other named Plaintiffs in the *Barba* Action and the named Plaintiffs in the *Netwall*, *Peluso*, and *Hartenstine* Actions, and the costs associated with administering the settlement (up to \$500,000), will be paid from the Settlement Fund before making payments to Settlement Class Members who submit valid claim forms.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you want to keep the right to sue or continue to sue Shire about the legal claims in this case, and you do not want to receive a payment from this settlement, you must take steps to get out of the settlement. This is called excluding yourself or opting out of the settlement.

17. How do I get out of the settlement?

To exclude yourself from the settlement, you may complete the exclusion form found online at www.AdderallXRSettlement.com, or mail a written request for exclusion to the Settlement Administrator. Your request for exclusion must include: (1) your name and address, and the name and address of the patient for whom the Adderall XR[®] was purchased, if different; (2) the name of this case, *Barba v. Shire U.S., Inc.*, Case No. 1:13-cv-21158; (3) a statement that you are a Settlement Class Member and you wish to be excluded from the Settlement Class; and (4) your signature. Your request for exclusion must be emailed by **October 7, 2016** or mailed to the Settlement Administrator at the address below and postmarked no later than **October 7, 2016**:

Barba v. Shire U.S., Inc. Settlement Administrator
P.O. Box 40007
College Station, TX 77842-4007
info@AdderallXRSettlement.com

18. If I exclude myself, can I still get a payment from this settlement?

No. If you exclude yourself, you are telling the Court that you don’t want to be part of the Settlement Class in this settlement. You can only get a payment if you stay in the Settlement Class and submit a valid claim form.

19. If I do not exclude myself, can I sue Shire for the same claims later?

No. Unless you exclude yourself, you are giving up the right to sue Shire for the claims that this settlement resolves. You must exclude yourself from *this* lawsuit to start or continue with your own lawsuit or be part of any other lawsuit against Shire.

OBJECTING TO THE SETTLEMENT

You can tell the Court if you don’t agree with the settlement or any part of it.

20. How do I tell the Court that I do not like the settlement?

If you are a Settlement Class Member, you can object to the settlement if you do not like it or a portion of it. You can give reasons why you think the Court should not approve it. The Court will consider your views. To object, you must hand deliver or send a letter via First Class U.S. Mail saying that you object to the settlement of *Barba v. Shire U.S., Inc.*, Case No. 1:13-cv-21158. Your objection must also include: (1) your full name; (2) your mailing address; (3) all grounds for the objection, accompanied by any legal support known to the objecting settlement class member and his or her counsel; (4) the name, address and telephone number of the attorney representing you in your objection (if applicable), as well as any current or

former attorney that may receive compensation related to your objection; (5) a statement indicating whether you or the attorney representing you intend to appear or testify at the Court’s Fairness Hearing; and (6) your signature. Mail your objection to all three addresses below postmarked on or before **October 7, 2016**.

Clerk of the Court	Class Counsel	Counsel for Shire
Clerk of the Court Wilkie D. Ferguson, Jr. U.S. Courthouse 400 North Miami Avenue Miami, FL 33128	Conlee S. Whiteley, Esq. KANNER & WHITELEY, LLC 701 Camp Street New Orleans, LA 70130	Porter F. Fleming, Esq. Michael F. Brockmeyer, Esq. David A. Zwally, Esq. Edgar H. Haug, Esq. FROMMER LAWRENCE & HAUG LLP 745 Fifth Avenue New York, NY 10151

21. May I come to Court to speak about my objection?

If you are objecting to the Settlement you or your attorney may speak at the Fairness Hearing about your objection, but you are not required to do so.

22. What is the difference between objecting to the settlement and asking to be excluded from it?

Objecting is simply telling the Court that you don’t like something about the settlement. You can object only if you stay in the Settlement Class (do not exclude yourself). Excluding yourself is telling the Court that you don’t want to be part of the Settlement Class. If you exclude yourself, you cannot object because the settlement no longer affects you.

THE COURT’S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the settlement. You may attend and you may ask to speak, but you don’t have to.

23. When and where will the Court decide whether to approve the settlement?

The Court will hold a Fairness Hearing at 2:30 p.m. on Wednesday, November 9, 2016 in Courtroom 12-1 at the United States District Court for the Southern District of Florida, Wilkie D. Ferguson, Jr. U.S. Courthouse, 400 North Miami Avenue, Miami, Florida 33128. At this hearing, the Court will consider whether the settlement is fair, reasonable and adequate. It will also consider whether to approve Class Counsel’s request for an award of attorneys’ fees, expenses and costs, as well as a payment of \$5,000 each to Monica Barba and Jonathan Reisman and \$2,500 to each of the other Class Representatives as service awards. If there are objections, the Court will consider them. Judge Lenard may listen to people who have objected and advised the Court in writing that they intend to appear (*see* Question 21 above). After the hearing, the Court will decide whether to approve the settlement.

24. Do I have to come to the hearing?

No. Class Counsel will answer any questions Judge Lenard may have. However, you are welcome to come to the hearing at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but that is not necessary.

25. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing (*see* Questions 21 and 23 above).

IF YOU DO NOTHING

26. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will give up the rights explained in Question 14, including your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Shire about the legal issues in this case. In addition, you will not receive a payment from the Net Settlement Fund.

GETTING MORE INFORMATION

27. How do I get more information?

This Notice summarizes the proposed settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at www.AdderallXRSettlement.com. Additional information is also available by calling 1-877-369-4085 or by writing to *Barba v. Shire U.S., Inc.* Settlement Administrator, P.O. Box 40007, College Station, TX 77842-4007. Publicly-filed documents can also be obtained by visiting the office of the Clerk of the United States District Court for the Southern District of Florida or reviewing the Court’s online docket.