

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:

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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