# ZYDUS SETTLEMENT AGREEMENT

# TECHNICAL CORRECTIONS MEMORANDUM

# SEPTEMBER 4, 2025

The Zydus Settlement Agreement, dated April 4, 2025 (the "Agreement"), permits the Plaintiffs' Executive Committee, the Executive Committee of the State Attorneys General, and Zydus to meet and confer and make technical corrections to the Agreement as they agree are appropriate. *See* Agreement at § XIII.U. This memorandum summarizes the technical corrections issued on September 4, 2025.

## The Settlement Agreement

Correction made to Section IV.C to permit Zydus to pay the Implementation Administrator from interest accrued on the segregated bank accounts prior to the Payment Date. Section IV.C now states: "The Settlement Referee shall provide proof to the Enforcement Committee of the deposits required by Section IV.E.1 by the Deposit Date. Neither the Settlement Referee nor Zydus shall remove any money from the segregated bank accounts, except as provided by Section IV.G, Section IV.I, and Section VIII.A."