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March 6, 2025

VIA ECF & EMAIL

Hon. Faith S. Hochberg
Special Master
U.S. District Judge (ret.)
870 United Nations Plaza, Suite 12F
New York, New York 10017

**Re: *Mylan Pharmaceuticals Inc. v. Teva Pharmaceuticals Industries Ltd., et al.*
Civil Action No.: 2:21-cv-13087 (JXN-JSA)**

***In re Copaxone Antitrust Litig.,*
Civil Action No. 2:22-1232 (JXN-JSA)**

Dear Judge Hochberg:

This firm, together with Goodwin Procter LLP, represents Defendants Teva Pharmaceuticals Industries Ltd., Teva Pharmaceuticals USA, Inc., Teva Neuroscience, Inc., and Teva Sales & Marketing, Inc. (collectively, "Defendants") in the above-referenced matters. We write on behalf of the parties regarding certain upcoming deadlines.

On February 27, 2025, Your Honor issued a Report and Recommendation in *Mylan v. Teva*, No. 13087 (ECF No. 159), and in *In Re: Copaxone* (ECF No. 128), and the parties understand another Report and Recommendation in *In Re: Copaxone* will be issued in the future. The parties are currently assessing the numerous issues addressed by the Report and Recommendations, including to determine whether any party intends to elect to submit objections, which are presently due on March 13, 2025. As such, the parties respectfully request an extension of time, from March 13, 2025, to March 31, 2025, to file any objections to the Report and Recommendations should any party elect to do so. Likewise, the parties request the deadline to respond to any objections be extended to May 2, 2025, if any objections are filed.

Additionally, under the current schedule dated November 25, 2024 (ECF No. 156), the deadline for Teva to file its answers is next Thursday, March 13. However, the Report and Recommendations contemplate that Mylan and the Direct Purchaser Plaintiffs will file amended complaints that conform with Your Honor's recommendations.¹ Because the form of the operative

¹ Your Honor has noted a report and recommendation concerning Teva's motion to dismiss the Third-Party Payor Plaintiffs' claims will be issued. The Third-Party Payor Plaintiffs and Teva will confer, if necessary, to request an extension of the default 14-day timeframe for filing objections to that report and recommendation, once it issues. The Third-Party Payor Plaintiffs otherwise agree with the schedule proposed herein for Plaintiffs to file Amended Complaints and for Teva to respond to the same.

complaints is unsettled, and in order to ensure an efficient procedure for Plaintiffs to file amended complaints and for Teva to respond to those amended complaints, the parties respectfully request that the deadline for Plaintiffs to file any amended complaints be 60 days after the issuance of any final order determining the scope of the amendments or, if no relevant party objects to the relevant Report and Recommendation, 60 days after the time to object expires or any objection(s) are withdrawn. Likewise, the parties request the deadline for Teva to respond to any amended complaints from Mylan, the Direct Purchaser Plaintiffs and the Third-Party Payor Plaintiffs be extended until 21 days after the filing of the amended complaints.

Should the Court find the above amended schedule acceptable, the parties respectfully request that Your Honor "So Order" this letter and have it entered on the docket. As always, we thank the Court for its attention to this matter and are available should Your Honor or Your Honor's staff have any questions.

Respectfully submitted,

s/Liza M. Walsh

Liza M. Walsh

cc: Counsel of Record (via ECF and Email)

Submitted to the Court as a Report & Recommendation with consent of all counsel to the contents.

SO ORDERED:



Hon. Faith S. Hochberg, Special Master

Date: March 10, 2025

***SO ORDERED.**

/s/ Jessica S. Allen

Hon. Jessica S. Allen, U.S.M.J.