

LEGAL NOTICE

If you paid for Lupron®—used to treat prostate cancer, endometriosis, uterine fibroids, and precocious puberty—you could get a payment from a legal settlement.

A nationwide class action settlement includes people and entities (together called “class members”) who paid for Lupron® from January 1, 1985 through March 31, 2005, and who qualify under the settlement. Lupron® is an injectible drug used to treat prostate cancer, endometriosis, uterine fibroids, and precocious puberty. If you’re included, you may ask for a payment, or exclude yourself from, or object to, the settlement. The United States District Court for the District of Massachusetts will have a hearing to decide whether to approve the settlement so that payments can be issued.

This is not about the safety or effectiveness of Lupron®.

Lawsuits said there was a fraudulent scheme that caused class members to overpay for Lupron®. The defendants, TAP Pharmaceutical Products Inc., Abbott Laboratories, and Takeda Pharmaceutical Company Limited deny all the allegations.

WHAT DOES THE SETTLEMENT PROVIDE?

Up to \$150 million will be paid. After allocating \$55 million to a separate settlement with certain large insurers, and then deducting attorneys’ fees (not to exceed 30% of \$95 million), expenses, and payments to class representatives, the net fund will be distributed in cash to consumers who submit valid claim forms, as well as to insurers and employee welfare benefit plans and other entities, which are also included. Up to 42.1% of the net fund will go to consumers—about \$100 minimum each, or more. A

detailed notice and the settlement agreement are available at www.lupronclaims.com, or by calling 1-866-410-7650.

HOW DO YOU GET A PAYMENT?

Simply fill out and follow the instructions on the claim form below, and mail it by **May 15, 2005**. Or get a claim form at www.lupronclaims.com. The amount you get depends on how much Lupron® you paid for, and how many valid claims are filed.

YOUR OTHER RIGHTS.

If you don’t want a payment, and if you don’t want to be legally bound, you must exclude yourself by **April 1, 2005**, or you won’t be able to sue, or continue to sue, the defendants about the cost of Lupron® or other legal claims in this case, ever again. If you exclude yourself, you can’t get a payment from this settlement. If you stay in the settlement, you may object to it if you do so by **March 15, 2005**. The detailed notice explains how to exclude yourself or object. The Court will hold a hearing in this case, called *In re Lupron® Marketing and Sales Practices Litigation*, No. 01-CV-10861-RGS, MDL 1430, on **April 13, 2005**, to consider whether to approve the settlement and a request for fees and expenses by the lawyers representing class members. You may ask to appear and speak at the hearing at your own cost, but you don’t have to. For more information call toll free or go to the website listed below.

www.lupronclaims.com

1-866-410-7650

I’d like a payment from the Lupron® settlement.

Consumer Claim Form

Complete and mail to the address below, postmarked by **May 15, 2005**.

Your Name

Dates You or Patient took Lupron® (Month/Year - Month/Year)

Your Address

Name of Doctor who Prescribed Lupron®

Your City, State, Zip

Doctor’s City and State

Name of Lupron® Patient / Relationship to you

Patient’s Date of Birth

How much money did you pay for Lupron® from January 1, 1985 through March 31, 2005?
(Notes: Deduct any insurance reimbursements you got. Attach one proof of payment if you have it. See the detailed notice. You may be asked for more information at a later time.)

\$ _____

I declare that the information here is true and correct. If not submitting this for myself, I am authorized to submit this form on behalf of the patient above.

Mail by May 15, 2005 to:
Lupron Settlement Administrator
P.O. Box 24604
West Palm Beach, FL 33416

Signature

Date