IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: GENERIC PHARMACEUTICALS PRICING ANTITRUST LITIGATION	MDL NO. 2724 16-MD-2724
THIS DOCUMENT RELATES TO: ***All End-Payer Plaintiffs' Actions***	HON. CYNTHIA M. RUFE

NOTICE REGARDING END-PAYER PLAINTIFFS' MOTION FOR RELIEF WITH RESPECT TO FALSE AND MISLEADING COMMUNICATIONS TO CLASS MEMBERS BY CLAIMS RECOVERY FIRMS

End-Payer Plaintiffs ("EPPs") hereby provide this Notice to apprise the Court of additional facts that have come to light since EPPs filed their November 11, 2025 Motion for Relief With Respect to False and Misleading Communications to Class Members By Claims Recovery Firms, MDL Doc. 3791 ("Motion"), and the Declaration of Roberta D. Liebenberg in support thereof, MDL Doc. 3793 ("Liebenberg Declaration").

Service of the Motion and Liebenberg Declaration

On November 11, 2025, the Motion and Liebenberg Declaration were placed in a ShareFile folder and served by email on each of the entities and individuals identified in paragraph 2 of the Motion, except Keith Anderson of Pearl Logic. On November 12, 2025, David Grossman, Esq. agreed in writing to accept service by email. Second Declaration of Roberta D. Liebenberg ¶¶ 4-5 ("Second Decl.").

As of today's date, EPPs have received ShareFile notifications indicating that the following individuals have either viewed or downloaded the Motion and Liebenberg Declaration: Gerry Blaum of Innovation Programs LLC; Nelson Griswold of Insurance Bottom Line; David

Grossman of Kelly & Grossman LLP; and Barry Rowley, Rocky Cathey, C. [Christine] Anderson, and Keith Anderson of Pearl Logic. Second Decl. ¶ 6.

The Motion and Liebenberg Declaration were also personally served on (1) Gerald F. Blaum of Innovation Programs (*see* Affidavit of Service, MDL Doc. 3803); (2) Mark Hoffman of Lightwave Solutions, Inc.; (3) Nelson Griswold of NextGen Benefits Network and Bottom Line Solutions, Inc.; and (4) Barry Rowley of Pearl Logic. Second Decl. ¶ 7.

The Motion and Liebenberg Declaration have been posted to the EPP Settlement Website along with the following text: "The claims process has not yet begun. The lawyers for the Classes have filed a motion with the Court about false and misleading solicitations, websites and social media posts by "claims recovery" firms. To view a copy of that motion, click HERE. Class members need not sign up with or pay a claims recovery firm in order to participate in the settlements. For authorized updates regarding claims, please register HERE." Second Decl. ¶ 8.

Newly Discovered Solicitation Materials and Misrepresentations

After EPPs filed the November 11, 2025 Motion, EPP Lead Counsel learned of another false and misleading solicitation being disseminated to class members, apparently by Pearl Logic, styled as an "Executive Update" regarding the "Pharmaceutical Industry Overcharging Recovery Program."(Second Decl. ¶ 10 and Ex. A). This document:

- Misleadingly includes a portion of the official court-approved Notice to EPPs regarding the Sun/Taro settlement that makes it appear that the solicitation itself is Court-approved:

Pharmaceutical Industry Overcharging
RECOVERY PROGRAM

EXECUTIVE UPDATE
November 6, 2025

If your organization has not yet received this official Legal Notice that **your organization is a plaintiff in this multi-district litigation** (MDL) on generic drugs, you should expect to. The mailer below was sent to an organization that had filed with Pearl Logic and the Pharma Recovery Program to pursue recovery of damages from generic drug companies' collusion and price-fixing over the past 20 years.

Please note that this Notice was **authorized by the federal court** overseeing the multi-district litigation that produced this class action settlement.

Your organization is already a plaintiff in this MDL. As a plaintiff, your company has **three options**:

LEGAL NOTICE

If You Paid or Reimbursed for Certain GENERIC DRUGS in the United States between May 1, 2009 and December 31, 2019, You Could Get a Payment from a Class Action Settlement.

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

www.GenericDrugsEndPayerSettlement.com

Your legal rights might be affected by a new $200 million Settlement with Sun Pharmaceutical Industries, Inc. ("Sun") and Taro Pharmaceuticals U.S.A., Inc. ("Taro") ("Sun/Taro" refers to both entities) in a class action lawsuit (*In re Generic Pharmaceuticals Antitrust Litigation*, No. 16-MD-2724 (E.D. Pa.)). The lawsuit claims generic manufacturers violated federal and state antitrust laws, consumer protection statutes, and common law, causing End-Payers – including Consumers and Third-Party Payers ("TPPs") (*e.g.*, entities such as insurers or employers with self-funded prescription drug plans) – to pay more than they should have for certain generic drugs ("Named Generic Drugs"). Sun/Taro denies liability. The lawsuit remains ongoing against the Non-Settling Defendants.

70030-Generic Drugs Sun Taro-AO-PST 9/25

In re Generic Pharmaceuticals End-Payer Antitrust Litigation
c/o A.B. Data, Ltd.
P.O. Box 173118
Milwaukee, WI 53217

PRESORTED
FIRST-CLASS MAIL
U.S. POSTAGE
PAID
MILWAUKEE, WI
PERMIT NO. 3780

Postmaster: Please DO NOT Cover Up Barcode

Notice ID: 945421477

00019993
000063
000077

********AUTO**ALL FOR AADC 600
[redacted]
ROCKFORD IL 611[redacted]

- Offers class members three options: (i) opt out and get nothing; (ii) do nothing and participate in the class settlement; or (iii) "seek a recovery based on actual damages" by signing up with Pearl Logic. *Id.*

- Claims that opting out of the class settlement and signing up with Pearl Logic entails **"no cost and zero risk."** (emphasis in original).

- Claims that participating in the class settlement would lead to a recovery of only "**10-15 percent of the payment your organization could receive**" if it instead opted out and used the "law firm consortium that works with Pearl Logic." (emphasis in original).

- Estimates a recovery of $850,000 for a 200-member health plan, $3.5 million for a 1,000-member health plan, and $17.5 million for a 5,000-member health plan that signs up with

> Pearl Logic. *Id.* It claims that, by contrast, participating in the Sun/Taro settlement would result in an average recovery of only $8,000. *Id.*

EPP Lead Counsel also recently learned of a spreadsheet entitled "Pharmacy Overpayment Recovery Estimate" that appears to have been disseminated by Pearl Logic (Second Decl. ¶ 11 and Ex. B). The spreadsheet shows a total recovery of $10,412,500 for an employer with 1,700 employees (Second Decl. Ex. B).

In addition, EPP Lead Counsel recently became aware of additional individuals sharing Pearl Logic's misleading information about the settlements and this litigation with class members, including Rocky Cathey, National Executive Director of Pearl Logic, Inc., and Larry DiGiovanni, who has a Pearl Logic e-mail address, larryd@pearllogic.com (Second Decl. ¶¶ 12-15 and Exs. C and D). Mr. DiGiovanni appears to be affiliated with REP Innovation, whose website lists the same phone number appearing under Mr. DiGiovanni's Pearl Logic email address, (Second Decl. ¶ 14 & Ex. E). Via email, Mr. DiGiovanni solicited a class member to sign up for Pearl Logic's "Pharmaceutical Industry Overcharging Recovery Program." Mr. DiGiovanni's email makes the following misrepresentations:

> A mass tort attorney consortium that represents Multi District Litigation (MDL's) for the U.S. Government met with our leadership team at Pearl Logic over the summer and asked us to assist them with bringing awareness to the Pharmaceutical Damage Recovery Fund that is now available to employer groups that have more than 200 members (employees + dependents) and that are self-insured. These funds were recently made available as a result of a hard fought 8-year litigation between the DOJ/FTC/AG's and the pharmaceutical players.

Second Decl. ¶ 13 and Ex. D. The e-mail falsely claims that numerous companies that are Direct Action Plaintiffs in the MDL have signed an "Attorney Authorization/Retainer Agreement" with Pearl Logic. Among the companies he falsely claims have signed up are Kroger (Civ. A. No. 18-cv-284), Southwest Airlines (Civ. A. No. 25-2951), and American Airlines (Civ. A. No. 1430). *See* Second Decl. ¶ 15 and Ex. D.

Finally, EPP Lead Counsel have learned that the following individuals and entities are also spreading misinformation about the *Generic Pharmaceuticals* MDL.

Superior Insurance Advisors and Paul H. Flowers, Jr.: Superior Insurance has engaged in a "Recovery Drive" to help "employers, municipalities, and benefit trusts in claiming reimbursement from the Department of Justice's $600 billion Pharma Overcharge Recovery Fund." Second Decl. ¶ 17 and Ex. F. An article based on the press release states:

- Paul H. Flowers, Jr. is leading the program. *Id.*
- "Flowers emphasized the urgency for employers to act, stating that those who fail to submit claims risk leaving millions of dollars unclaimed." *Id.*
- "Critical deadlines are rapidly approaching, with generic medication claims due by November 15, 2025 . . . ." *Id.*
- "National legal teams including Hagens Berman Sobol Shapiro LLP, Keller Rohrback LLP, and Pearl Logic LLC are supporting the recovery efforts." *Id.*

The Superior Insurance press release (Second Decl. Ex. G) states that:

- "Superior Insurance Advisors (SIA) today announced the launch of a Midwest-wide Employer Pharma-Funds Recovery Drive, a large-scale initiative helping employers, municipalities, and benefit trusts claim their share of the Department of Justice's $600 billion Pharma Overcharge Recovery Fund." Second Decl. ¶ 18 and Ex. G. It also provides contact information for Paul H. Flowers, Jr. *See id.*

Mr. Flowers also posted a video on his YouTube channel entitled "Exposing Big Pharma's $600B Secret Payout – Act Now to Claim Your Share." In this video, Mr. Flowers says that employers can recover $200-300 per insured person, going back fourteen years. He also warns that "[t]ime is running out." Second Decl. ¶ 19 and Ex. H.

Employers Consulting Group: This entity has created a web page, https://ecgins.com/rx-recovery/, that states the following:

- **"What Happened?** Over 40 pharmaceutical companies and three major Pharmacy Benefit Managers (PBMs) were sued by multiple State Attorneys General, the FTC, and the DOJ. Allegations included Price Fixing, Collusion, Unfair & Deceptive Trade Practices, RICO Violations, and Breach of Contract." Second Decl. ¶ 20 and Ex. I.
- **"The Recovery Opportunity:** Up to $600 Billion Dollars in potential Recovery Funds are being made available for Self-Insured Plan Sponsors affected by the alleged anti-competitive, price fixing & collusive industry practices." *Id.*
- "Estimated damages up to $200–$300 per person, per year, going back up to 14 years" and "Potential recovery: $1M+ for mid-size employers." *Id.*

Richard Giraldez of Remote Medical Solutions: Mr. Giraldez made a Facebook post with the caption, "*****BUSINESS OWNERS: $600 BILLION Pharma Settlement – Deadline Approaching!*****" Second Decl. ¶ 21 and Ex. J. The post includes a link to make an appointment with Mr. Giraldez to discuss "information on the pending $600 Billion dollar Pharmaceutical Overcharging Recovery Case." He appears to work for Remote Medical Solutions. *See* Second Decl. Ex. K (Calendly link). Mr. Giraldez's Facebook post says:

- "**YOUR POTENTIAL RECOVERY**" is "$200-$300 per employee/year (up to 14 years" and "Mid-size companies recovering $1M-$4M+" Second Decl. ¶ 21 Ex. J.
- "Government-backed program" *Id.*
- There is a November 15 deadline, and "****Allocation is FIRST-COME, FIRST-SERVED****" *Id.*

- "This isn't a lawsuit – it's recovering money that was STOLEN from your company through rigged pricing schemes." *Id.*

EPPs have served Mr. Flowers, Employers Consulting Group, and Mr. Giraldez with emailed copies of the Motion and Liebenberg Declaration. *See* Second Decl. ¶ 22. EPPs have received ShareFile notifications indicating that Mr. Flowers and Bill Schmaltz of Employers Consulting Group have either viewed or downloaded the Motion and Liebenberg Declaration. *Id.* ¶ 23.

EPPs respectfully submit these additional materials to the Court for its consideration in connection with the Motion.

Supplemental Authority: Bartz v. Anthropic PBC

EPPs recently learned of similar improper solicitations by a claims recovery firm in connection with the class settlement in *Bartz v. Anthropic PBC*, No. 3:24-cv-05417 (N.D. Cal.) ("*Anthropic*"). The *Anthropic* court held a hearing last week regarding ClaimsHero, a firm that has encouraged class members to opt out of a settlement in that case. In some instances, ClaimsHero is allegedly misleading *Anthropic* class members by implying that they are filing a claim, rather than opting out. During the hearing last week, Judge Alsup said it appears that the firm is "trying to trick people" for a "quick buck." At the end of the hearing, the court ordered ClaimsHero to submit to the court and class counsel all of its marketing materials associated with the opt-out effort. An evidentiary hearing is scheduled for November 25, 2025 to explore the details of ClaimsHero's campaign. *See* Second Decl. ¶ 24 and Ex. L.

Dated: November 18, 2025

Respectfully submitted,

*/s/ Roberta D. Liebenberg*_________

Roberta D. Liebenberg
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Philadelphia, Pennsylvania 19107
(215) 567-6565
rliebenberg@finekaplan.com

Lead and Liaison Counsel for End-Payer Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: GENERIC PHARMACEUTICALS PRICING ANTITRUST LITIGATION	MDL NO. 2724 16-MD-2724
THIS DOCUMENT RELATES TO: ***All End-Payer Plaintiffs' Actions***	HON. CYNTHIA M. RUFE

[REVISED PROPOSED] ORDER
REGARDING FALSE AND MISLEADING COMMUNICATIONS
TO CLASS MEMBERS BY CLAIMS RECOVERY FIRMS

AND NOW, this ____ day of ________________ 2025, upon consideration of End-Payer Plaintiffs' ("EPPs") Motion for Relief with Respect to False and Misleading Communications to Class Members by Claims Recovery Firms ("Motion"), MDL Doc. 3791, and EPPs' Notice Regarding the Motion, MDL Doc. _____ , it is hereby **ORDERED** that the Motion is **GRANTED**. It is further **ORDERED** as follows:

1. The persons and entities identified below in subparagraphs (a) through (s) shall, within seven (7) days of the date of this Order: (1) provide to EPP Lead Counsel a list of names and contact information for all persons and entities who they have contacted regarding this litigation and the settlements in this litigation; (2) disclose to EPP Lead Counsel all of their marketing efforts, including the identities of all individuals or entities they are associated or working with; all written, electronic and oral communications concerning this litigation and the settlements; and all websites they have established and all social media posts they have made regarding the litigation and the settlements; (3) post corrections to all of the false, deceptive, and misleading statements and material omissions about this litigation and the settlements in their marketing materials, websites, and social media posts; and (4) state in their communications,

websites, and social media posts concerning this litigation and the settlements that the claims process has not yet begun, class members need not sign up for a third-party service to participate in settlements, and no-cost assistance in filing claims will be made available from the Claims Administrator and EPP Lead Counsel. In addition, these persons and entities and those associated or working with them are hereby ordered to submit any proposed future communications, website statements, or social media posts regarding this litigation and the settlements to the Court for its review and approval at least fourteen (14) days before dissemination or posting on the Internet.

(a) Mark Hoffman of Lightwave Solutions, Inc.

(b) David Grossman, Esq. and the law firms of Grossman & Kelly, LLP and David Grossman & Associates, PLLC

(c) Shaynaz Malleck

(d) Pearl Logic, Inc.

(e) Christine Anderson of Pearl Logic

(f) Christine Pierce of Pearl Logic

(g) Keith Anderson of Pearl Logic

(h) Barry Rowley of Pearl Logic

(i) Nelson Griswold of NextGen Benefits Network and Bottom Line Solutions, Inc.

(j) Andy Crawford of ENV Technologies and Pearl Logic

(k) Innovation Programs LLC

(l) Gerald F. Blaum of Innovation Programs

(m) Acrutiv/Hudson Planning Group

(n) Rocky Cathey, National Executive Director of Pearl Logic

(o) Larry DiGiovanni of Pearl Logic and REP Innovation

(p) Superior Insurance Advisors

(q) Paul H. Flowers, Jr.

(r) Employers Consulting Group

(s) Richard Giraldez of Remote Medical Solutions

2. The Claims Administrator shall send curative notice to all affected EPP class members at the expense of the persons and entities identified above in paragraph 1(a) - (s).

3. Any EPP class member who entered into a contract with any of the persons and entities identified above in paragraph 1(a) – (s) or those associated or working with them may rescind that contract, and the Claims Administrator shall notify all such class members of this right at the expense of those persons and entities.

4. All opt-out requests submitted on behalf of EPP class members by the persons and entities identified above in paragraph 1(a) - (s) or by those associated or working with them are declared invalid. The Claims Administrator shall notify any affected class members that they may opt-out within fifteen (15) days after receipt of curative notice.

5. Lead Counsel for the End-Payer Plaintiffs shall provide this Order to the above-named persons and entities forthwith.

It is so **ORDERED.**

BY THE COURT:

____

CYNTHIA M. RUFE, J

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: GENERIC PHARMACEUTICALS PRICING ANTITRUST LITIGATION	MDL NO. 2724 16-MD-2724
THIS DOCUMENT RELATES TO: ***All End-Payer Plaintiffs' Actions***	HON. CYNTHIA M. RUFE

SECOND DECLARATION OF ROBERTA D. LIEBENBERG IN SUPPORT OF END-PAYER PLAINTIFFS' MOTION FOR RELIEF WITH RESPECT TO FALSE AND MISLEADING COMMUNICATIONS TO CLASS MEMBERS BY CLAIMS RECOVERY FIRMS

I, Roberta D. Liebenberg, hereby declare and state as follows:

1. I am the Senior Member at the law firm of Fine Kaplan and Black, R.P.C. ("Fine Kaplan"). I was appointed by the Court to serve as Lead and Liaison Counsel for the End-Payer Plaintiffs ("EPPs"). I have personal knowledge of the following facts and, if called as a witness, I could competently testify to these matters.

2. I provide this Second Declaration In Support of End-Payer Plaintiffs' Motion For Relief With Respect to False and Misleading Communications To Class Members By Claims Recovery Firms ("Motion"), MDL Doc. 3791.

3. On November 11, 2025, EPPs filed the Motion and the Declaration of Roberta D. Liebenberg in support thereof ("Liebenberg Declaration"), MDL Doc. 3793.

4. On November 11, 2025, my firm served the Motion and Liebenberg Declaration by email (using ShareFile) on each of the entities and individuals identified in paragraph 2 of the Motion, except Keith Anderson of Pearl Logic.

5. On November 12, 2025, David Grossman, Esq. agreed in writing to accept service by email.

6. As of today's date, my firm has received ShareFile notifications indicating that the following individuals have either viewed or downloaded the Motion and Liebenberg Declaration: Gerry Blaum of Innovation Programs LLC; Nelson Griswold of Insurance Bottom Line; David Grossman of Kelly & Grossman LLP; Barry Rowley, Rocky Cathey, C. [Christine] Anderson, and Keith Anderson of Pearl Logic.

7. The Motion and Liebenberg Declaration were also personally served on (1) Gerald F. Blaum of Innovation Programs (*see* Affidavit of Service, MDL Doc. 3803); (2) Mark Hoffman and Lightwave Solutions, Inc.; (3) Nelson Griswold and NextGen Benefits Network and Bottom Line Solutions, Inc.; and (4) Barry Rowley and Pearl Logic.

8. The Motion and Liebenberg Declaration have been posted to the EPP Settlement Website, https://genericdrugsendpayersettlement.com/, along with the following text: "The claims process has not yet begun. The lawyers for the Classes have filed a motion with the Court about false and misleading solicitations, websites and social media posts by 'claims recovery' firms. To view a copy of that motion, click HERE. Class members need not sign up with or pay a claims recovery firm in order to participate in the settlements. For authorized updates regarding claims, please register HERE."

9. Since filing the Motion, my firm and I have learned of additional misrepresentations by Pearl Logic and other claims recovery firms about the *Generic Pharmaceuticals* MDL, as well as similar improper solicitations by a claims recovery firm in connection with *Bartz v. Anthropic PBC*, No. 3:24-cv-05417 (N.D. Cal.) ("*Anthropic*").

Newly Discovered Misrepresentations, Rocky Cathey, Larry DiGiovanni

10. My firm has recently become aware of additional Pearl Logic misrepresentations regarding the *Generic Pharmaceuticals* MDL. As an example, Pearl Logic appears to have sent a solicitation styled as an "Executive Update" regarding the "Pharmaceutical Industry Overcharging Recovery Program" to EPP class members. A copy of the Executive Update is attached hereto as **Exhibit A.** This document:

a. Misleadingly includes a portion of the official Court-approved Notice to EPPs regarding the Sun/Taro settlement that makes it appear that the solicitation itself is Court-approved.

b. Offers class members three options: (i) opt out and get nothing; (ii) do nothing and participate in the class settlement; or (iii) "seek a recovery based on actual damages" by signing up with Pearl Logic. *Id.*

c. Claims that opting-out and pursuing an individual suit for "actual damages" entails **"no cost and zero risk."** *Id*. (emphasis in original).

d. Claims that participating in the class settlement would lead to recovery of only "**10 to 15 percent of the payment your organization could receive"** by instead opting out and using the "law firm consortium that works with Pearl Logic." *Id.* (emphasis in original).

e. Estimates a recovery of $850,000 for a 200-member health plan, $3.5 million for a 1,000- member health plan, and $17.5 million for a 5,000-member health plan that signs up with Pearl Logic. *Id.* By contrast, it claims that participants in the Sun/Taro settlement would only receive an average payout of $8,000. *Id*.

11. Attached hereto as **Exhibit B** hereto is a spreadsheet entitled "Pharmacy Overpayment Recovery Estimate." Upon information and belief, Pearl Logic has been disseminating this spreadsheet with other marketing materials. The spreadsheet shows a total recovery of $10,412,500 for an employer with 1,700 employees. *Id.*

12. In addition, my firm has also learned of additional individuals involved in the Pearl Logic solicitations, including Rocky Cathey, National Executive Director, Pearl Logic, Inc. Attached hereto as **Exhibit C** is a Pearl Logic flyer that includes Mr. Cathey's contact information.

13. Attached hereto as **Exhibit D is** an email from Larry DiGiovanni (larryd@pearllogic.com) soliciting a class member to sign up for Pearl Logic's "Pharmaceutical Industry Overcharging Recovery Program." The email, which has been redacted to protect the confidentiality of the recipient, makes the following misrepresentations:

> A mass tort attorney consortium that represents Multi District Litigation (MDL's) for the U.S. Government met with our leadership team at Pearl Logic over the summer and asked us to assist them with bringing awareness to the Pharmaceutical Damage Recovery Fund that is now available to employer groups that have more than 200 members (employees + dependents) and that are self-insured. These funds were recently made available as a result of a hard fought 8-year litigation between the DOJ/FTC/AG's and the pharmaceutical players.

Id.

14. Mr. DiGiovanni appears to be affiliated with REP Innovation, whose website lists the same phone number appearing under Mr. DiGiovanni's Pearl Logic email address. *See* **Exhibit E (**printout from REP Innovation website, https://repinnovation.com/contact/).

15. Mr. DiGiovanni's e-mail falsely claims that numerous companies that are Direct Action Plaintiffs in the MDL have signed an "Attorney Authorization/Retainer Agreement" with Pearl Logic. Among the companies he falsely claims have signed up are Kroger (Civ. A. No. 18-

cv-284), Southwest Airlines (Civ. A. No. 25-2951), and American Airlines (Civ. A. No. 1430). *See* Ex. D.

Superior Insurance Advisors/Paul H. Flowers, Jr.

16. Since filing the Motion, my firm has also become aware of the following additional individuals and entities that are advertising and/or soliciting EPP class members with false and misleading statements and material omissions.

17. Attached hereto as **Exhibit F** is an article based on a press release by Superior Insurance Advisors entitled "Midwest Employers Urged to Claim Share of $600 Billion Pharma Recovery Fund," available at https://www.citybuzz.co/2025/10/23/midwest-employers-urged-to-claim-share-of-600-billion-pharma-recovery-fund/. It states:

a. Superior Insurance Advisors has engaged in a "Recovery Drive" to help "employers, municipalities, and benefit trusts in claiming reimbursement from the Department of Justice's $600 billion Pharma Overcharge Recovery Fund." *Id.*

b. Paul H. Flowers, Jr. is leading the program. *Id.*

c. "Flowers emphasized the urgency for employers to act, stating that those who fail to submit claims risk leaving millions of dollars unclaimed." *Id.*

d. "Critical deadlines are rapidly approaching, with generic medication claims due by November 15, 2025 . . . ." *Id.*

e. "National legal teams including Hagens Berman Sobol Shapiro LLP, Keller Rohrback LLP, and Pearl Logic LLC are supporting the recovery efforts." *Id.*

18. Attached hereto as **Exhibit G** is a press release dated October 23, 2025 entitled "Superior Insurance Advisors Launches Midwest-Wide Employer Pharma-Funds Recovery

Drive." It is available on yahoo! Finance, https://finance.yahoo.com/news/superior-insurance-advisors-launches-midwest-152900949.html.

a. The press release states, "Superior Insurance Advisors (SIA) today announced the launch of a Midwest-wide Employer Pharma-Funds Recovery Drive, a large-scale initiative helping employers, municipalities, and benefit trusts claim their share of the Department of Justice's $600 billion Pharma Overcharge Recovery Fund." *Id.*

b. Contact information for Paul H. Flowers, Jr. is provided. *See id.*

19. Paul H. Flowers, Jr. has a YouTube channel, on which he posted a video entitled "Exposing Big Pharma's $600B Secret Payout – Act Now to Claim Your Share." A screenshot from that video is attached hereto as **Exhibit H**. In this video, Mr. Flowers says that employers can recover $200-300 per insured person, going back fourteen years. He also warns that "[t]ime is running out." *Id.*

Employers Consulting Group ("ECG")

20. Attached hereto as **Exhibit I** is a printout from the website of Employers Consulting Group ("ECG"), https://ecgins.com/rx-recovery/. This page states the following:

a. **"What Happened?** Over 40 pharmaceutical companies and three major Pharmacy Benefit Managers (PBMs) were sued by multiple State Attorneys General, the FTC, and the DOJ. Allegations included Price Fixing, Collusion, Unfair & Deceptive Trade Practices, RICO Violations, and Breach of Contract." *Id.*

b. **"The Recovery Opportunity:** Up to $600 Billion Dollars in potential Recovery Funds are being made available for Self-Insured Plan Sponsors affected by the alleged anti-competitive, price fixing & collusive industry practices." *Id.*

c. "Estimated damages up to $200–$300 per person, per year, going back up to 14 years" and "Potential recovery: $1M+ for mid-size employers." *Id.*

Richard Giraldez, Remote Medical Solutions

21. Attached hereto as **Exhibit J** is a printout of a Facebook post by Richard Giraldez, with the caption, "***BUSINESS OWNERS*: $600 *BILLION Pharma Settlement – Deadline Approaching!***"** Exhibit J is redacted to protect the Facebook account holder who printed this post. The post includes a link to make an appointment with Mr. Giraldez to discuss "information on the pending $600 Billion dollar Pharmaceutical Overcharging Recovery Case." He appears to work for Remote Medical Solutions. *See* **Exhibit K** (Calendly link). Mr. Giraldez's Facebook post also says:

a. "**YOUR POTENTIAL RECOVERY"** is "$200-$300 per employee/year (up to 14 years" and "Mid-size companies recovering $1M-$4M+" Ex. J.

b. "Government-backed program" *Id.*

c. There is a November 15 deadline, and "****Allocation is FIRST-COME, FIRST-SERVED****" *Id.*

d. "This isn't a lawsuit – it's recovering money that was STOLEN from your company through rigged pricing schemes." *Id.*

22. My firm has served Mr. Flowers, Employers Consulting Group, and Mr. Giraldez with emailed copies (using ShareFile) of the Motion and Liebenberg Declaration.

23. My firm has received ShareFile notifications indicating that Mr. Flowers and Bill Schmaltz of Employers Consulting Group have either viewed or downloaded the Motion and Liebenberg Declaration.

***Supplemental Authority: Bartz v. Anthropic PBC*, No. 3:24-cv-05417 (N.D. Cal.)**

24. My firm and I recently learned of similar improper solicitations by a claims recovery firm in connection with the class settlement in *Bartz v. Anthropic PBC*, No. 3:24-cv-05417 (N.D. Cal.) ("*Anthropic*"). According to Law360 and Bloomberg, the *Anthropic* court held a hearing last week regarding ClaimsHero, a firm that has encouraged class members to opt out of a settlement in that case. In some instances, ClaimsHero is allegedly misleading Anthropic class members by implying that they are filing a claim, rather than opting out. During the hearing, Judge Alsup said it appears that the firm is "trying to trick people" for a "quick buck." At the end of the hearing, the court ordered ClaimsHero to submit to the court and class counsel all of its marketing materials associated with the opt-out effort. An evidentiary hearing is scheduled for November 25, 2025 to explore the details of ClaimsHero's campaign. *See* **Exhibit L** (Law360 and Bloomberg articles).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on this 18th day of November 2025 in Philadelphia, PA.

/s/ Roberta D. Liebenberg
Roberta D. Liebenberg

EXHIBIT A

Pharmaceutical Industry Overcharging

RECOVERY PROGRAM

EXECUTIVE UPDATE

November 6, 2025

If your organization has not yet received this official Legal Notice that **your organization is a plaintiff in this multi-district litigation** (MDL) on generic drugs, you should expect to. The mailer below was sent to an organization that had filed with Pearl Logic and the Pharma Recovery Program to pursue recovery of damages from generic drug companies' collusion and price-fixing over the past 20 years.

Please note that this Notice was **authorized by the federal court** overseeing the multi-district litigation that produced this class action settlement.

Your organization is already a plaintiff in this MDL. As a plaintiff, your company has **three options**:

LEGAL NOTICE

If You Paid or Reimbursed for Certain GENERIC DRUGS in the United States between May 1, 2009 and December 31, 2019, You Could Get a Payment from a Class Action Settlement.

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

www.GenericDrugsEndPayerSettlement.com

Your legal rights might be affected by a new $200 million Settlement with Sun Pharmaceutical Industries, Inc. ("Sun") and Taro Pharmaceuticals U.S.A., Inc. ("Taro") ("Sun/Taro" refers to both entities) in a class action lawsuit (*In re Generic Pharmaceuticals Antitrust Litigation*, No. 16-MD-2724 (E.D. Pa.)). The lawsuit claims generic manufacturers violated federal and state antitrust laws, consumer protection statutes, and common law, causing End-Payers – including Consumers and Third-Party Payers ("TPPs") (*e.g.*, entities such as insurers or employers with self-funded prescription drug plans) – to pay more than they should have for certain generic drugs ("Named Generic Drugs"). Sun/Taro denies liability. The lawsuit remains ongoing against the Non-Settling Defendants.

70030-Generic Drugs Sun Taro-AO-PST 9/25

In re Generic Pharmaceuticals End-Payer Antitrust Litigation
c/o A.B. Data, Ltd.
P.O. Box 173118
Milwaukee, WI 53217

PRESORTED
FIRST-CLASS MAIL
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[redacted]
ROCKFORD IL 611[redacted]

OPTION 1 **OPT OUT**

If your organization chooses **not to recover any damages from the drug companies' overcharges to your health plan for generic drugs and insulin over the past 21 years**, you should contact the Claims Administrator and opt out of this and all future Class Action Settlements that arise from this multi-district litigation.

OPTION 2 **DO NOTHING**

By doing nothing, your organization will be included automatically in this and all future Class Action Settlements with the drug company defendants in this MDL. The Settlement Funds will be allocated in prorated payments to tens of thousands of companies, which will amount to a total of **$10-15 per plan member**. Class Action payments are **about 10 to 15 percent of the payment your organization could receive from a recovery based on actual damages.**

What would a **Class Action Settlement payout** look like? There are over 77,000 U.S. employers with 250 or more employees and, thus, likely to be self-insured. Using the $200 million Sun/Taro Pharmaceutical settlement from the Notice above, *if only a third (~25,000) of these self-insured companies participated in the settlement*, while settlement payments would be prorated, **the *average* payout to a plaintiff would be about $8,000**.

OPTION 3

SEEK A RECOVERY ON ACTUAL DAMAGES

Since your organization is a plaintiff in this multi-district litigation, you have the right to **pursue recovery based on actual damages to your health plan**.

In this generic drug litigation only (*not* including any recovery on insulin overcharges) with a 14-year look back, recovery is *estimated* (could be less, could be more) to be:

$240 x (**# of plan members**) x (**# of years self-funded**) (up to 14)

200-member health plan self-insured for the past 14 years: **$850,000**

1,000-members with 14 years self-insured: **$3,500,000**

5,000-members 14 years self-insured: **$17,500,000**

Again, compare the **recovery based on actual damages vs. the $10-15 per plan member** from a class action settlement...a recovery of actual damages or 10-15 cents on the dollar.

If your organization chooses Option 3, Pearl Logic can help.

The law firm consortium that works with Pearl Logic is **the only legal team working the generic MDL that has opted out of all future class actions** to preserve their clients' right to pursue recovery based on actual damages. All other law firms have committed to the class action strategy.

Pearl Logic will help your organization:

- join both the generic drugs MDL and the insulin MDL;
- opt out of all class actions;
- engage our legal team; and
- start the process to seek recovery based on actual damages.

IMPORTANT DEADLINE: Due to two Class Action Settlements closing their opt-out window on **December 2, 2025**, our attorney group has set a **December 1 filing deadline** to opt clients out of these two Class Actions and enter the MDL as a named plaintiff to file your claim with the Court for actual damages. To allow the attorneys time to draft the documents, there is a **November 15 administrative deadline for submitting paperwork** to the attorneys.

No Cost, No Risk

Because Pearl Logic and the attorney group are working on a pure contingency basis, **there is no upfront cost** to retain them to facilitate your recovery process and represent your claim. They're paid only when your organization recovers damages. So there is **no cost and zero risk to enter your claim to recover actual damages**. And with the **fiduciary obligation** to pursue recovery of these misappropriated plan assets, there is **no reason** not to engage Pearl Logic to complete the filing process by the December 1 deadline.

To begin the damage claim recovery process,

see your contact who provided you this information.

EXHIBIT B

Pharmacy Overpayment Recovery Estimate

	Year	Employee Headcount	multiplier	Total members on Plan	Estimated per member recovery	Estimated recovery by year
1	2012	1,700	1.75	2975	250	$ 743,750
2	2013	1,700	1.75	2975	250	$ 743,750
3	2014	1,700	1.75	2975	250	$ 743,750
4	2015	1,700	1.75	2975	250	$ 743,750
5	2016	1,700	1.75	2975	250	$ 743,750
6	2017	1,700	1.75	2975	250	$ 743,750
7	2018	1,700	1.75	2975	250	$ 743,750
8	2019	1,700	1.75	2975	250	$ 743,750
9	2020	1,700	1.75	2975	250	$ 743,750
10	2021	1,700	1.75	2975	250	$ 743,750
11	2022	1,700	1.75	2975	250	$ 743,750
12	2023	1,700	1.75	2975	250	$ 743,750
13	2024	1,700	1.75	2975	250	$ 743,750
14	2025	1,700	1.75	2975	250	$ 743,750
	Total					**$ 10,412,500**

Please enter the estimated insured employee for each year and the calculator will do the rest

EXHIBIT C

Pharmaceutical Industry

Overcharging Recovery Program

You've Been Overcharged. Now it's Time to Recover!

PEARL LOGIC

Pharmaceutical Industry Overcharging Recovery Program

You Were Overcharged. This is Your Opportunity to Recover Your Money!

If your company is self-insured and has 200+ healthcare plan members,

you may be owed hundreds of thousands — or even millions of dollars — in recovery funds,

from a historic legal settlement targeting **pharmaceutical industry corruption.**

What Happened

Over **40 pharmaceutical companies** and **3 major Pharmacy Benefit Managers (PBMs)** were sued by multiple State Attorneys General, the FTC, and the DOJ. Allegations included Price Fixing, Collusion, Unfair & Deceptive Trade Practices, RICO Violations, and Breach of Contract.

Optum (owned by UnitedHealth Group)

Express Scripts® (owned by Cigna)

CVS caremark (owns Aetna)

The Recovery Opportunity

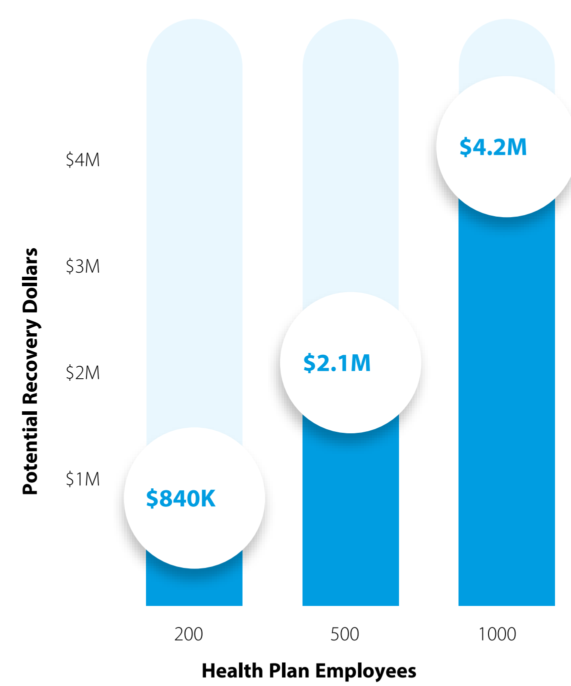
Up to $600 Billion Dollars in potential Recovery Funds are being made available for Self-Insured Plan Sponsors affected by the alleged anticompetitive, price fixing & collusive industry practices.

- Estimated damages of $200–$300 per employee, per year, going back up to 14 years
- Potential recovery: $1M+ for mid-size employers
- No upfront costs: PearlLogic works on contingency only
- Typical claim recovery time: 18 months (+/- 6 months)
- Allocation is on a First Come, First Served basis

Possible Recovery Amount Example

Estimated damages of overpaying due to Pharma Industry **Anticompetitive, Price Fixing & Collusive** practices	=	**~$200 - $300+** Per Plan Member / Year
		x
Total number of 'enrolled' Plan Members **(Employees + Dependents),** in Healthcare Plan	=	**600** Plan Members
		x
Litigation **"Look Back"** Period	=	**14** Years
	=	**~$1.68M - $2.52M+**

Get your Recovery Claim in Queue as Soon as Possible!



How the System Was Rigged Against You

For over two decades, PBMs and drug manufacturers engaged in two illegal schemes:

1. **PBMs demanded hidden, ever-increasing "rebates"** in exchange for preferred drug placement—driving up costs for employers and employees alike.
2. **Drug makers inflated prices** to fund those rebates and secure top spots on formularies—even as production costs fell and generics remained unchanged.

The result? You paid drastically more than necessary—and now it's time to recover those overcharges.

Real-World PBM Overcharging Examples

Drug	Health Care Plan Paid (PBM Price)	Cash Price Available At Local Pharmacies	% Overpaid (Over The Average Cash Price)
Teriflunomide	$10,239.69	$52.76 avg	**19,302% markup**
Imatinib	$16,398.17	$202.05 avg	**8,017% markup**
Abiraterone Acetate	$5,375.26	$105.72 avg	**4,984% markup**

No Risk, All Reward

This is a government-supported recovery program, not a class-action lawsuit.

- No legal exposure to your company
- No time-intensive commitment, just a few key steps to get started
- No upfront fees, PearlLogic works on contingency only
- No cost to your company unless we recover funds
- We are only compensated from your successful recovery

The Simple Process to Recovery

1. Execute a Recovery Agreement: https://recoveryagreement.pearllogic.com
2. Complete a brief Pre-Qualification Questionnaire and Application
3. Schedule a short Attorney Discovery Meeting
4. Let our legal team handle the rest, including all claims submissions

Let PearlLogic Be Your Advocate

PearlLogic is a trusted national leader in healthcare cost recovery and compliance. We bring integrity, insight, and legal expertise to ensure your claim is maximized with zero risk to you. As the nation's trusted partner in health plan optimization and cost containment, PearlLogic brings decades of experience navigating complex healthcare economics and litigation processes.

Contact PearlLogic Today

PEARL LOGIC

Rocky Cathey

National Executive Director

Pearl Logic, Inc.

SHRM Business Partner & Member

404-254-8373

rcathey@pearllogic.com.

www.whoisPearlLogic.com

EXHIBIT D

From: **larryd@pearllogic.com** <larryd@pearllogic.com>
Date: Wed, Oct 29, 2025 at 5:32 AM
Subject: Thank You ([redacted])
To: [redacted]

Good morning, [redacted]

I wanted to thank you for taking the time on Monday to explore the Pharmaceutical Damage Recovery Program that is available to [redacted]

Below is our 3-Step process and some additional content for you to review. I also attached our brochure and the PQQ form associated with Step-2 below.

Please do not hesitate to reach out to me directly if there are any questions or a need for a second zoom meeting

3 Step Process

Step 1 – [redacted] and Pearl Logic to execute Recovery Agreement **(link below)**

https://RecoveryAgreement.PearlLogic.com

(If link doesn't open upon clicking, copy-and-paste link into your browser)

Step 2 - [redacted] to complete 1-page questionnaire **(Attached)**

After completing, the Pre-Qualification Questionnaire (PQQ) will need to be uploaded to:

https://Uploads.PearlLogic.com

(If link doesn't open upon clicking, copy-and-paste link into your browser)

Also, please let us know if you (or anyone else) would like to schedule a Zoom Meeting to step through this PQQ, so we can answer any questions.

Step 3 – Pearl Logic to provide [redacted] with a link to the Attorney Authorization/Retainer Agreement for review and execution **($0 upfront cost/expense to Raytown C-2 School District).** This link is provided after steps 1 and 2 are completed

Link to FAQ

https://faq.pharmarecoveryprogram.pearllogic.com/

Brief History (Pearl Logic)

Pearl Logic is a 22-year-old cost containment company that has been offering a "Go-Forward Health-Care Plan Savings" solution to employer groups in the U.S. for many years. Showing employer groups how to reduce their "prescription" and "procedure" expenses is their core offering.

A mass tort attorney consortium that represents Multi District Litigation (MDL's) for the U.S. Government met with our leadership team at Pearl Logic over the summer and asked us to assist them with bringing awareness to the Pharmaceutical Damage Recovery Fund that is now available to employer groups that have more than 200 members (employees + dependents) and that are self-insured. These funds were recently made available as a result of a hard fought 8-year litigation between the DOJ/FTC/AG's and the pharmaceutical players

Because Pearl Logic has been educating employer groups on healthcare plan savings techniques (including prescription drugs) for over 10 years, it was a natural fit for us to educate employer groups on how they can participate in this "Retroactive Damage Recovery Program" so they could receive monies owed to them for being overcharged for prescription drugs over the past 14 - 20 years

Partial list of Employer Groups that have completed step 3 above

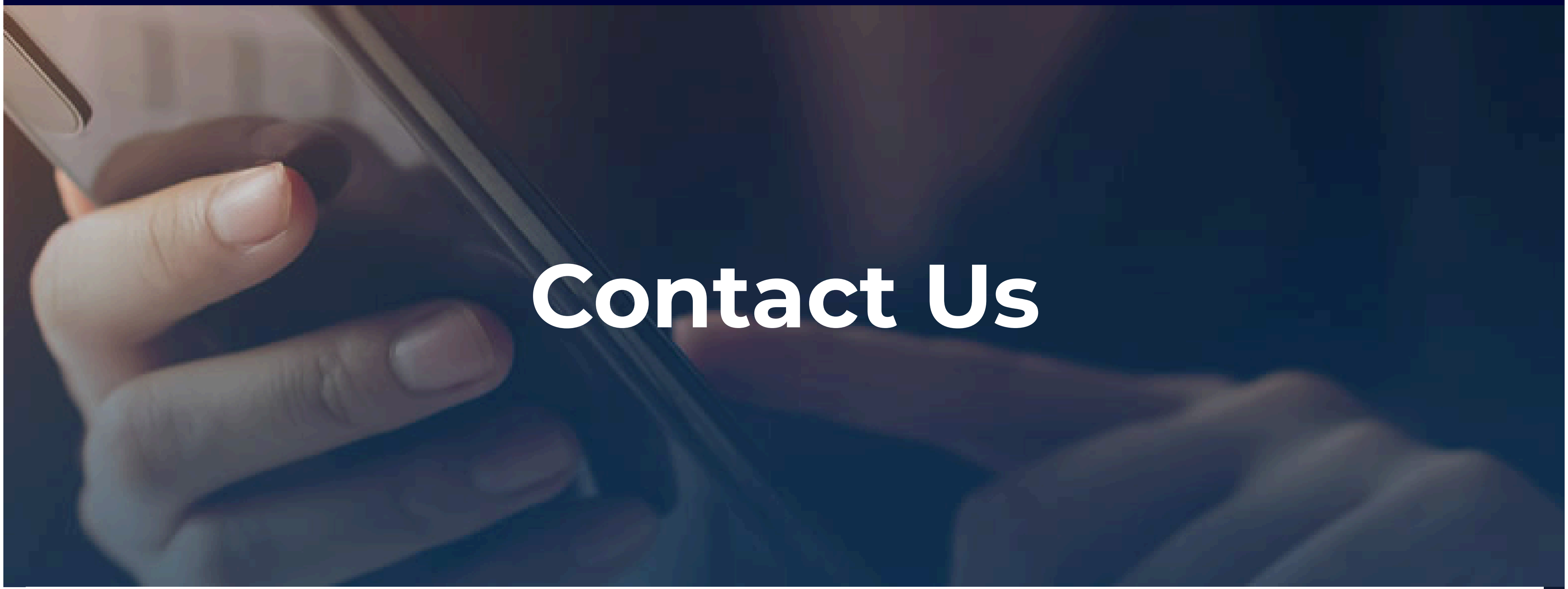
Montage Health System (3k members)
Kroger's Grocery (400k members)
Service Employees Int'l Union (SEIU) -2 mil members
International Brotherhood of Electrical Workers (IBEW) - 800k members
United Food and Commercial Workers Int'l Union – (1.2M members)
Salinas Valley Health System – (3k members)
Carteret Health Care (2k members)
Southwest Airlines (72k members)
State of Alabama (400k members)
O'Reilly Auto Parts (94k members)
General Motors (97k members)
Lowe's (300k members)
Target (400k members)
American Airlines (103k members)

Aramark Services (273k members)
Lumen Technologies (29k members)
RTX (185k members)
US Foods (28k members)

Larry DiGiovanni
Mobile:585-750-2473
Email: larryd@pearllogic.com
www.pearllogic.com

PEARL LOGIC

EXHIBIT E



Phone: 585-750-2473

Email: info@repinnovation.com

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Last Name

Email

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Other

SUBMIT

REP innovation

SOLUTIONS

- Healthcare
- Education
- Security
- Fintech

ABOUT US

- Our Story
- Our Mission
- Our History
- our Culture

CONTACT US

TEAM

ADVISOR LOG IN

Phone: 585-750-2473

Email: info@repinnovation.com

EXHIBIT F

Midwest Employers Urged to Claim Share of $600 Billion Pharma Recovery Fund

OCTOBER 23, 2025

Superior Insurance Advisors has initiated a Midwest-wide Employer Pharma-Funds Recovery Drive to assist employers, municipalities, and benefit trusts in claiming reimbursement from the Department of Justice's $600 billion Pharma Overcharge Recovery Fund. The program, led by fiduciary-certified healthcare advisor Paul H. Flowers Jr., addresses systematic overpricing by pharmaceutical manufacturers and pharmacy benefit managers that has burdened employer health plans for more than a decade.

The recovery effort stems from consolidated lawsuits including Insulin Pricing Litigation that allege major pharmaceutical companies and PBMs such as **Prime Therapeutics** (Blue Cross), **Optum** (United Healthcare), **CVS Caremark** (Aetna), and **Express Scripts** (Cigna) artificially inflated drug prices through collusion and misaligned incentives. Flowers emphasized the urgency for employers to act, stating that those who fail to submit claims risk leaving millions of dollars unclaimed.

Critical deadlines are rapidly approaching, with generic medication claims due by November 15, 2025, and insulin-related claims requiring submission by January 15, 2026. The recovery program allows self-insured employers, unions, and municipal plans to seek reimbursement for excess payments dating back over ten years. National legal teams including **Hagens Berman Sobol Shapiro LLP**, Keller Rohrback LLP, and Pearl Logic LLC are supporting the recovery efforts.

In partnership with Life Health & Legal Education Partners, Superior Insurance Advisors is conducting educational workshops to guide CFOs, HR leaders, and municipal administrators through the claim process. These sessions cover eligibility requirements, data collection methods, and filing strategies to maximize recovery amounts. The initiative also positions Gary, Indiana as a regional center for healthcare accountability and multi-state cooperation across the Midwest.

Flowers described the program as fundamentally about restoring fiduciary responsibility to healthcare management, noting that the recovery drive represents more than financial restitution—it aims to establish new standards of fairness in American benefits administration. The effort briefly aligns with Opioid Free America initiatives, helping municipalities responsibly utilize national opioid settlement grants to reduce dependency and enhance community health outcomes.

The pharmaceutical recovery initiative addresses long-standing concerns about transparency in drug pricing and the complex relationships between manufacturers, pharmacy benefit managers, and employer health plans. With billions of dollars potentially available for recovery, the program represents one of the largest healthcare reimbursement opportunities for employers in recent history.

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EXHIBIT G

newsfile

Superior Insurance Advisors Launches Midwest-Wide Employer Pharma-Funds Recovery Drive

Newsfile
October 23, 2025 1 min read

Gary, Indiana--(Newsfile Corp. - October 23, 2025) - Superior Insurance Advisors (SIA) today announced the launch of a Midwest-wide Employer Pharma-Funds Recovery Drive, a large-scale initiative helping employers, municipalities, and benefit trusts claim their share of the Department of Justice's $600 billion Pharma Overcharge Recovery Fund.

To view the full announcement, including downloadable images, bios, and more, click here.

Key Takeaways:

- Midwest-wide initiative helps employers claim share of $600 billion Pharma Overcharge Recovery Fund.
- Legal teams support recovery efforts for excess payments in drug pricing.
- Workshops educate on claim eligibility and filing strategies to restore healthcare stewardship.

Click image above to view full announcement.

About Superior Insurance

Superior Insurance Advisors has been successfully meeting the needs of our clients in all 50 states since 2005. Our dedicated agents specialize in healthcare solutions for individuals and families. But, we simply don't believe in the "one-size-fits-all" approach. We work with you to create individualized solutions. Our team is here to help our clients ask the right questions, identify their specific insurance demands and voice their concerns so we can best meet them.

Contacts:

Paul H. Flowers Jr.
844-513-5433
Paul@SuperiorInsuranceAdvisors.com

Source: Newsworthy.ai

To view the source version of this press release, please visit https://www.newsfilecorp.com/release/271596

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EXHIBIT H

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Exposing Big Pharma's $600B Secret Payout – Act Now to Claim Your Share

Paul H. Flowers Jr.
601 subscribers

Subscribe 1 Share Downloaded

76 views Streamed live on Oct 22, 2025 #Insulin #BigPharma #Healthcare

A shocking $600 billion is on the line for self-funded employers, and almost no one knows about it. Over 40 pharmaceutical companies and the 3 biggest pharmacy benefit managers have been accused of colluding to inflate drug prices – from insulin to everyday generics
moorebusinessresources.com
. After an 8-year legal battle, they've effectively agreed to pay back roughly $600 billion in overcharges to affected employers
moorebusinessresources.com
. This could mean millions of dollars refunded per employer (estimated $200–$300 per insured person per year, going back 14 years
moorebusinessresources.com
).

Who's eligible? Any organization with a self-funded health plan (even as few as ~200 employees) that paid for prescription drugs could qualify. This is a one-time chance to reclaim money stolen through inflated drug costs. Major insulin makers like Eli Lilly, Novo Nordisk, and Sanofi, along with large PBMs, allegedly hiked insulin prices in lockstep and shared secret rebates – a scheme so massive officials call it perhaps "the largest cartel case in U.S. history". And it's not just insulin – a separate lawsuit alleges hundreds of generic drugs were price-fixed, with some prices jacked up over 1,000%.

Why haven't you heard? Because Big Pharma doesn't want you to. This payout isn't automatic; they only pay if you file a claim. The industry is reportedly doing everything possible to keep this quiet – every unclaimed dollar is money they keep on their balance sheets. Time is running out: a federal judge has set January 15, 2026 as the deadline for insulin-related claims, and a cutoff for generic drug claims will follow soon after. Miss these deadlines, and your share of the recovery vanishes for good.

#BigPharma #DrugPrices #Insulin #Healthcare #SelfFunded #Justice

EXHIBIT I

EMPLOYERS CONSULTING GROUP

MEMBER NEXTGEN BENEFITS NETWORK

You Were Overcharged.
You May Be Able to Recover Funds.

Why Is This Important?

If your company is self-insured and has 200+ healthcare plan members, you may be owed hundreds of thousands — or even millions of dollars — in recovery funds.

What Happened?

Over 40 pharmaceutical companies and three major Pharmacy Benefit Managers (PBMs) were sued by multiple State Attorneys General, the FTC, and the DOJ. Allegations included Price Fixing, Collusion, Unfair & Deceptive Trade Practices, RICO Violations, and Breach of Contract.

The Recovery Opportunity

Up to $600 Billion Dollars in potential Recovery Funds are being made available for Self-Insured Plan Sponsors affected by the alleged anti-competitive, price fixing & collusive industry practices.

Estimated damages up to $200–$300 per person, per year, going back up to 14 years.

Potential recovery: $1M+ for mid-size employers

Typical claim recovery time: 12-18 months

Our Expertise

ECG is a trusted national leader in healthcare. We bring integrity, insight, and expertise to ensure your claim is maximized with zero risk to you. As the nation's trusted partner in health plan optimization and cost containment, ECG brings decades of experience navigating complex healthcare economics.

It is an honor to have been selected to assist in this project. Our role is to inform companies of the program and handle the referral process. All services are on a contingency basis.

Want More Information? Contact Us Now

Name & Title *

Email Address *

Company Name *

Phone Number *

City/State* *

Submit My Request

LOCATIONS

MO Location:
231 S Bemiston Ave, Suite 800
St. Louis, MO 63105

CONTACT US

OFFICE • (314) 324-2113
FAX • 888.274.1538

Email • bill@ecgins.com

EMPLOYERS CONSULTING GROUP

Sitemap

Joe • 314.825.0944
Robin • robin@ecgins.com

About Us

Contact Us

Home

EXHIBIT J

[redacted]

Richard Giraldez
October 30 at 12:13 PM ·

🚨 ***BUSINESS OWNERS**: $600 **BILLION Pharma Settlement - Deadline Approaching**!** 🚨

If your company has 200+ employees with health benefits, you may be owed MILLIONS from systematic pharmaceutical overcharging.

****THE PROOF**:**
Big Pharma charged you 8,000-19,000% MORE than cash prices for the SAME medications your employees needed.

****YOUR POTENTIAL RECOVERY**:**
💰 $200-$300 per employee/year (up to 14 years)
💰 Mid-size companies recovering $1M-$4M+
💰 ZERO upfront costs or risk
💰 Government-backed program

⏰ **DEADLINE: November 15, 2025**
****Allocation is FIRST-COME, FIRST-SERVED****

This isn't a lawsuit - it's recovering money that was STOLEN from your company through rigged pricing schemes.

Don't let millions slip away while you "think about it."

👉 ****Claim your spot**:**
[https://PharmaRecovery.Info]
(https://PharmaRecovery.Info)

📞 ****Call now**:** 833-379-9727**

***The companies that act TODAY will be celebrating tomorrow. Will yours be one of them**?*

#BusinessOwners #PharmaSettlement #Healthcare #BusinessRecovery #UrgentDeadline

1 1

Like Comment Share

Most relevant

Dave Babins
DEADLINEIS APPROACHING

[redacted]

EXHIBIT K

SINCE 2024

REMOTE MEDICAL SOLUTIONS

Richard Giraldez

Meeting About Pharmaceutical Overcharging Recovery

30 min

Web conferencing details provided upon confirmation.

This meeting is to provide information on the pending $600 Billion dollar Pharmaceutical Overcharging Recovery Case.

Select a Date & Time

November 2025

November is now displayed

Sun	Mon	Tue	Wed	Thu	Fri	Sat
26	27	28	29	30	31	1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	1	2	3	4	5	6

Time zone

Eastern Time - US & Canada (9:10am)

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EXHIBIT L

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Anthropic Judge Rips Opt-Out Law Firm As 'Quick Buck' Ploy

By **Bonnie Eslinger**

Law360 (November 13, 2025, 7:10 PM EST) -- A California federal judge on Thursday blasted Arizona law firm ClaimsHero Holdings LLC for encouraging authors to opt out of Anthropic PBC's $1.5 billion deal to end copyright infringement claims, saying it looks like the firm is "trying to trick people" for a "quick buck."

Anthropic settled class claims in August that it exploited the copyrighted works of authors to train its flagship large language model, Claude. The class says an Arizonia law firm is deceptively encouraging class members to opt out of the settlement. (Photo by Jaque Silva/NurPhoto via AP)

At the end of a hearing in San Francisco, U.S. District Judge William H. Alsup ordered an evidentiary hearing on Nov. 25 to probe class counsel's claims that ClaimsHero is deceptively encouraging class members to opt out of the settlement. He said ClaimsHero's CEO needed to be present at the hearing and that the six opt-out clients who submitted declarations to the court must show up via videoconference.

"I'm going to get to the bottom of what they thought they were getting into," Judge Alsup said.

ClaimsHero is an Arizona law firm that last year received an **alternative business structure** license from the state, which allows for nonlawyer ownership of the firm.

The firm touts itself as "more than a law firm" and promises to use technology to "flip the tables" on "corporate wrongdoers and bad actors." Its website encourages users to complete easy-to-fill-out forms to opt out of a menu of major class action settlements.

A lawyer for the authors and publishers, Rachel Geman of Lieff Cabraser Heimann & Bernstein LLP, told Judge Alsup that ClaimsHero is reaching out to class members with an aggressive and misleading marketing campaign encouraging them to opt out for more money.

"This is not an attempt to limit speech, that is a red herring," Geman said. "This is an attempt to stop fraud."

Class members can opt out of the case, but they must first be informed of the risks and the costs, she said.

Geman showed the court a letter that ClaimsHero sent out stating that class members will only receive $3,000 and "deserve more."

But if class members opt out they could end up with less money or nothing at all, Geman said.

Some of the wording on ClaimsHero's website also could lead people to believe they're submitting a claim instead of giving up their right to settlement funds, she said. For example, there's wording on the page about Anthropic stating, "Join thousands of Americans who've filed with ClaimsHero."

The website also wrongly states that class members "should have received a claim notice" or email from the claim administrator — the notice isn't scheduled to go out until Nov. 24, Geman said.

An attorney for ClaimsHero, Velvel Freedman of Freedman Normand Friedland LLP, said using the word "claims" on the ClaimsHero page about Anthropic wasn't misleading because it's also used to describe "lawsuits," which his client is prepared to file for the opt-outs.

Judge Alsup asked if ClaimsHero has ever filed a lawsuit as counsel of record. Freedman said ClaimsHero is a new law firm.

Judge Alsup noted that the declarations from ClaimsHero's new opt-out clients indicate that they expect that the law firm will only take "a small percentage" of any recovery at the end.

"That's an impossible model, that's fraud on its face," Judge Alsup said. "There's no way that ClaimsHero, which has zero track record in any court, is going to be able to bring a lawsuit against Anthropic."

He suggested that perhaps ClaimsHero planned to sue Anthropic with the expectation that the suit will be settled by "harassment."

"Think again," Judge Alsup said. "These people are going to fight you, and you will lose that case."

Freedman said new law firms can secure financing, partner with more established law firms and take on large cases.

He also argued that ClaimsHero's opt-out clients are sophisticated authors, adding that one is Pulitzer-winning author John Carreyrou, who wrote "Bad Blood," the book about Theranos.

The court is acting "paternalistically" in preventing class members from retaining ClaimsHero, he said.

"They can opt out all they want," Judge Alsup said. "But they should not be tricked into opting out."

Freedman later told the court that ClaimsHero's page for Anthropic opt-outs is clear.

Encouraging opt-outs is beneficial, he said.

"It helps you, Your Honor, in your duty of vetting the claim," Freedman said. "Because right now, you have no adversity. ... Plaintiffs and defendants are holding hands here, trying to get you to approve a settlement."

At the end of the hearing, Judge Alsup said he was troubled by the matter and ordered ClaimsHero to submit to the court and class members all of its marketing materials associated with the opt-out effort.

"I am disturbed by this record," the judge said, adding that it looked to him "like a blatant attempt by your client ClaimsHero to trick people into opting out" to make a "quick buck."

Judge Alsup said it appeared that ClaimsHero's plan is to accumulate so many opt-outs that it can go to Anthropic and plaintiffs' counsel and try to get a better deal for its clients.

"That would be extortion," the judge said.

Judge Alsup said while ClaimsHero makes a $3,000 payment seem like a bad deal, it's not.

"It's a good deal," the judge said. "This is not a strong case for statutory damages."

The judge told Freedman that his client needed to disclose that the court had held that it was **fair use** for Anthropic to use the copyright-protected material to train its generative text tool. It was only the authors' claims over the company's use of online pirated works that would have gone to trial.

Judge Alsup also said ClaimsHero needed to disclose that it was inexperienced and that there would likely be another law firm pulled in with a higher contingency fee.

"I feel this is the single biggest misleading part," the judge said, adding if such a disclosure isn't made, it is "bait and switch" and "fraud."

Authors in the class action accused Anthropic of **exploiting their copyrighted works** through "largescale theft" to train its flagship large language model, Claude.

Anthropic announced it had **reached a deal** to end the authors' suit in August, and more details came out weeks later.

Judge Alsup **initially refused** to sign off on the proposed deal but gave his preliminary approval in late September. Along the way, the judge noted during a hearing that the deal has an "abort clause" in case a high percentage of class members opt out. The specific percentage agreed upon, however, is confidential, he said.

Earlier this month, the authors **urged the court** to stop ClaimsHero's marketing tactics.

In its opposition filed on Thursday, ClaimsHero told the court that the firm's marketing is constitutionally protected commercial speech. It said that its website was never misleading but that after being contacted by counsel for the class it "immediately edited its website and advertising to eliminate any doubt about its operations."

The authors and publishers are represented by Rachel Geman, Jacob S. Miller, Danna Z. Elmasry, Daniel M. Hutchinson, Jallé H. Dafa, Amelia Haselkorn and Betsy A. Sugar of Lieff Cabraser Heimann & Bernstein LLP, Justin A. Nelson, Alejandra C. Salinas, Rohit D. Nath, Michael Adamson, J. Craig Smyser and Samir H. Doshi of Susman Godfrey LLP, Scott J. Shoulder and CeCe M. Cole of Cowan DeBaets Abrahams & Sheppard LLP, Jay Edelson of Edelson PC and Matthew J. Oppenheim of Oppenheim & Zebrak LLP.

ClaimsHero is represented by Ivy Ngo, Devin (Velvel) Freedman and Alex Potter of Freedman Normand Friedland LLP.

The case is Andrea Bartz et al. v. Anthropic PBC, case number 3:24-cv-05417, in the U.S. District Court for the Northern District of California.

--Additional reporting by Gina Kim, Elliot Weld, Adam Lidgett, Hailey Konnath and Rae Ann Varona. Editing by Brian Baresch.

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Judge Flames Firm Luring Authors Out of $1.5 Billion AI Pact (2)

Annelise Levy

4–5 minutes

A federal judge accused a third-party law firm of attempting to "trick" authors out of their record $1.5 billion copyright class action settlement with Anthropic PBC.

Judge William Alsup called ClaimsHero's tactics to lure authors away from the deal "a fraud of immense proportions" during a Thursday hearing in San Francisco. He demanded the company alter its "misleading" communications with potential claimants.

He told ClaimsHero's counsel, Devin Freedman of Freedman Normand Friedland LLP, he's "disturbed" by the "blatant attempt by your client to trick people into opting out" to make a "quick buck" by accumulating opt outs to try and cut a sweeter deal with Anthropic. Alsup said that would amount to "extortion" and that he'd refer the company to the US attorney if it happens.

The court gave ClaimsHero 48 hours to update their website to clarify that the company has no experience litigating in federal or state court. They must also explain on their site that the court ruled for Anthropic on the question of whether it's legal to train AI models on the authors' books. They must also terminate any use of the word “claims” from their site that class counsel believes is misleading.

As Anthropic’s counsel, Douglas Winthrop of Arnold & Porter Kaye Scholer LLP, exited the courtroom, he was heard saying that Alsup had taken a “flamethrower” to ClaimsHero.

An evidentiary hearing is scheduled for Nov. 25 for the court to question authors who’ve signed up for ClaimsHero’s services.

The authors on Nov. 4 asked the US District Court for the Northern District of California to limit communications from the third-party claims company. Class counsel argued ClaimsHero’s website encourages authors who believe they qualify for a settlement payout to complete a form that may actually exclude themselves from the deal.

Under the deal, Anthropic will pay about $3,000 for each of the nearly 500,000 included books to settle the lawsuit over the company’s AI training practices.

No Hero

ClaimsHero pushed back on Wednesday, arguing their website was never misleading. The outside firm accused authors’ attorneys of seeking a “complete gag order” to protect their potential $375 million payout in legal fees, a violation of ClaimsHero’s First Amendment rights.

Class counsel, Rachel Geman of Lieff Cabraser Heimann & Bernstein LLP, called the free speech argument a red herring. The motion is “not an attempt to limit speech,” she said “this is an attempt to stop fraud.”

Alsup went a step further, slamming ClaimsHero for attempting to mislead its potential clients by claiming the firm could take on Anthropic without a substantive track record in litigation. Alsup called ClaimsHero's lawsuit experience "Z-E-R-O" and dubbed their marketing as "propaganda."

"ClaimsHero isn't a hero of anything," he told Freedman.

Freedman retorted, asserting the company hasn't lied and instead made it clear authors have a right to the $3,000 award. The website encourages class members to opt out so ClaimsHero can fight for a bigger amount while disclosing lawsuits are uncertain and may take a long time, he said.

Alsup said the settlement is a home run for authors and that it's "baloney" to tell authors they'll get more.

"You may have your doubts about its ability to deliver on its promises," Freedman said. "But that's a different question and ClaimsHero has been acting in good faith."

Susman Godfrey LLP, Cowan Debaets Abrahams & Sheppard LLP, Edelson PC, and Oppenheim + Zebrak LLP also represent the authors.

Anthropic is also represented by Cooley LLP, Latham & Watkins LLP, Lex Lumina LLP, and Morrison & Foerster LLP.

The case is Bartz v. Anthropic PBC, N.D. Cal., No. 24-cv-05417, hearing held 11/13/25.