

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

THE HOSPITAL AUTHORITY OF  
METROPOLITAN GOVERNMENT OF  
NASHVILLE AND DAVIDSON COUNTY,  
TENNESSEE, d/b/a NASHVILLE GENERAL  
HOSPITAL and AMERICAN FEDERATION OF  
STATE, COUNTY AND MUNICIPAL  
EMPLOYEES DISTRICT COUNCIL 37 HEALTH  
& SECURITY PLAN,

Plaintiffs,

v.

MOMENTA PHARMACEUTICALS, INC. and  
SANDOZ INC.,

Defendants.

Civil Action No. 3:15-cv-01100

Chief Judge Waverly D. Crenshaw, Jr.  
Magistrate Judge Barbara D. Holmes

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF SETTLEMENT**

Plaintiffs The Hospital Authority of Metropolitan Government of Nashville and Davidson County and American Federation of State, County and Municipal Employees District Council 37 Health and Security Plan, by and through their undersigned counsel, hereby move this Court pursuant to Federal Rule of Civil Procedure 23 for an order:

- (1) finding that the Settlement Agreements with Momenta Pharmaceuticals, Inc. and Sandoz Inc. are “fair, reasonable, and adequate” pursuant to Rule 23(e);
- (2) finding that notice of the Settlements to the Class satisfies due process and Rule 23;
- (3) approving the Plan of Distribution.

This motion is based on this Motion and supporting Memorandum of Points and Authorities in Support; the declaration of Brendan P. Glackin, filed herewith; the declaration of Eric Miller, filed herewith; the declaration of Rebecca Blake, filed herewith; the pleadings and papers filed in this action; and such other matters as the Court may consider.

Dated: April 24, 2020

Respectfully submitted,

/s/ Brendan P. Glackin

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 24th day of April, 2020, the foregoing document was filed electronically with the U.S. District Court for the Middle District of Tennessee. Notice of this filing was served via the court's electronic filing system on counsel listed below:

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