

Settlement Document
Binding on State of Georgia When Executed by Georgia AG / Governor

**State of Georgia and Local Governments: Memorandum of Understanding
Concerning National Settlements with Alvogen, Inc., Amneal Pharmaceuticals LLC,
Apotex Corp., Hikma Pharmaceuticals USA Inc., Indivior Inc., Viatrix Inc.
("Mylan"), Sun Pharmaceutical Industries, Inc., and Zydus Pharmaceuticals (USA)
Inc.**

Foreword

This Memorandum of Understanding between the State of Georgia *ex rel.* Chris Carr, Attorney General (the "State"), and certain Georgia Local Government entities ("LGs") concerns the harms visited upon Georgia's citizens and the State itself by certain manufacturers, distributors, and pharmacies ("Opioid Defendants") of prescription opioids.

To address these harms, the State and certain LGs separately initiated litigation meant to hold Opioid Defendants accountable.

On December 31, 2021, the State entered into settlements with Opioid Defendants McKesson Corporation, AmerisourceBergen Corporation, Cardinal Health, Inc., Johnson & Johnson, Janssen Pharmaceuticals, Inc., Ortho-McNeil-Janssen Pharmaceuticals, Inc., and Janssen Pharmaceutica, Inc. (together, the "National Distributor and J&J Settlements"). The State has since entered into settlements with Teva Pharmaceutical Industries Ltd., Allergan Finance, LLC, Walmart Inc., CVS Health Corporation and CVS Pharmacy, Inc., Walgreen Co., and The Kroger Co.

Thereafter, the State and participating LGs entered into a Memorandum of Understanding to memorialize an agreement that would enable them to maximize the monetary help received from the National Distributor and J&J Settlements to address harms visited upon Georgia's citizens and the State itself in the opioid crisis (the "2022 MOU"). The State and participating LGs also entered into MOUs regarding the settlements with Teva Pharmaceutical Industries Ltd., Allergan Finance, LLC, Walmart Inc., CVS Health Corporation and CVS Pharmacy, Inc., Walgreen Co., and The Kroger Co.

On or about April 4, 2025, eight drug manufacturers, including **Alvogen, Inc., Amneal Pharmaceuticals LLC, Apotex Corp., Hikma Pharmaceuticals USA Inc., Indivior Inc., Viatrix Inc. ("Mylan"), Sun Pharmaceutical Industries, Inc., and Zydus Pharmaceuticals (USA) Inc.** (together, "Third Wave Manufacturers") entered into Settlement Agreements with certain Settling States, governmental subdivisions, and other entities ("Third Wave Manufacturer Settlements"). The State of Georgia and LGs are eligible to join the Third Wave Manufacturer Settlements.

During May 2025, the State opted into the Third Wave Manufacturer Settlements. The LGs have until October 8, 2025, to opt in to the Third Wave Manufacturer Settlements.