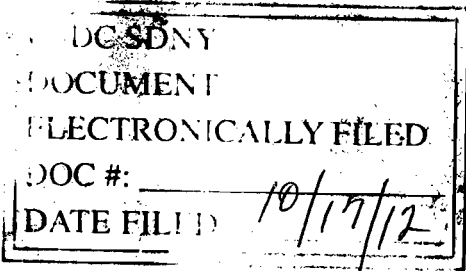


UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

|   |   |                                  |
|---|---|----------------------------------|
| -----X                                    | ) |                                  |
|   | ) |                                  |
| LOUISIANA WHOLESALE DRUG,                 | ) |                                  |
| COMPANY, INC., on behalf of itself and    | ) | CIVIL ACTION No. 12-cv-3711 (VM) |
| all others similarly situated,            | ) |                                  |
|   | ) |                                  |
| Plaintiff,                                | ) |                                  |
|   | ) |                                  |
| v.  | ) |                                  |
|   | ) |                                  |
| SHIRE LLC, and SHIRE U.S., INC.,          | ) |                                  |
|   | ) |                                  |
| Defendants.                               | ) |                                  |
| -----X                                    | ) |                                  |
|   | ) |                                  |
| VALUE DRUG COMPANY, on behalf of          | ) |                                  |
| itself and all others similarly situated, | ) | CIVIL ACTION No. 12-cv-5001 (VM) |
|   | ) |                                  |
| Plaintiff,                                | ) |                                  |
|   | ) |                                  |
| v.  | ) |                                  |
|   | ) |                                  |
| SHIRE LLC, and SHIRE U.S., INC.,          | ) |                                  |
|   | ) |                                  |
| Defendants.                               | ) |                                  |
| -----X                                    | ) |                                  |



**[PROPOSED] CONSENT ORDER**  
**CONSOLIDATING RELATED ACTIONS**

WHEREAS, on May 9, 2012, plaintiff Louisiana Wholesale Drug Company, Inc. (“LWD”) filed the above-captioned antitrust action (the “LWD Action”) against defendants Shire LLC and Shire U.S., Inc. (“Defendants”);

WHEREAS, on June 26, 2012, plaintiff Value Drug Company (“Value Drug”) filed the above-captioned antitrust action (the “Value Drug Action”) against Defendants asserting

allegations and claims substantially similar to the allegations and claims asserted in the LWD Action;

WHEREAS, plaintiffs in the LWD and Value Drug Actions have conferred and agreed to consolidate their actions before this Court; and

WHEREAS, Defendants consent to consolidation;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the undersigned parties, subject to the approval of the Court, as follows:

1. The following actions are hereby related and consolidated for all purposes, including pre-trial proceedings and trial:

| <u>Abbreviated Case Name</u>                             | <u>Case Number</u> | <u>Date Filed</u> |
|--|--------------------|-------------------|
| <i>Louisiana Wholesale Drug Co. v. Shire LLC, et al.</i> | 1:12-cv-3711 (VM)  | May 9, 2012       |
| <i>Value Drug Co. v. Shire LLC, et al.</i>               | 1:12-cv-5001 (VM)  | June 26, 2012     |

2. Every pleading filed in these consolidated actions, or in any separate action included herein, shall bear the following caption:

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

|   |   |   |
|---|---|---|
| <b>IN RE ADDERALL XR ANTITRUST<br/>LITIGATION</b> | ) | <b>Lead Case No. 1:12-cv-3711 (VM)</b>                |
|   | ) |   |
|   | ) | <b>(Consolidated with Case No. 1:12-cv-5001 (VM))</b> |
|   | ) |   |
| <b>This Document Relates To:<br/>ALL ACTIONS</b>  | ) |   |
|   | ) |   |
|   | ) |   |

3. When a pleading or other court paper filed in the Consolidated Action is intended to apply to all actions therein, the words "All Actions" shall appear immediately after the words "THIS DOCUMENT RELATES TO:" in the caption set out above. When a pleading or other court paper is intended to be applicable only to one, or some, but not all of such actions, the filing shall so indicate on the document to be filed;

4. The files of these consolidated actions shall be maintained in one file under Master Docket No. 1:12-cv-3711 (VM);

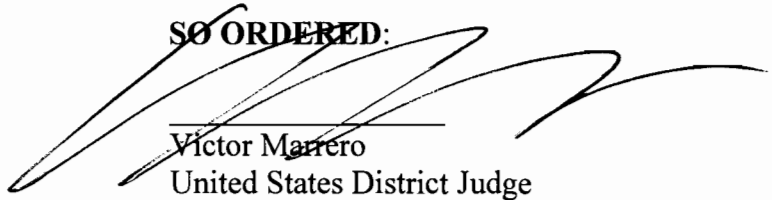
5. Defendants' motion to dismiss and all related briefing filed in the LWD Action shall be deemed to be filed in the Value Drug Action;

6. Defendants' time to respond to the complaint filed in the Value Drug Action is extended until fourteen (14) days after the entry of an Order deciding Defendants' motion to dismiss;

7. This Order shall apply to each case, arising out of the same or substantially the same transactions or events as these cases, which is subsequently filed in, removed to, or transferred to this Court;

8. When a case that properly belongs as part of the *In re Adderall XR Antitrust Litigation*, Master Docket No. 1:12-cv-3711 (VM), is hereafter filed in the Court or transferred here from another court, this Court requests the assistance of counsel in calling to the attention of the clerk of the Court the filing or transfer of any case which might properly be consolidated as part of the *In re Adderall XR Antitrust Litigation*, Master Docket No. 1:12-cv-3711 (VM), and counsel are to assist in assuring that counsel in subsequent actions receive notice of this Order.

**SO ORDERED:**



\_\_\_\_\_  
Victor Marrero  
United States District Judge

Dated: October 17, 2012  
New York, New York