

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ROOFER'S PENSION FUND,

v.

JOSEPH PAPA, et al.

No. 16-CV-2805-MCA-LDW

NOTICE OF PENDENCY OF CLASS ACTION

- TO:** (1) All persons who purchased Perrigo Co., plc's ("Perrigo") publicly traded common stock between April 21, 2015 and May 2, 2017, both dates inclusive, on the New York Stock Exchange or any other trading center within the United States and were damaged thereby;
- (2) All persons who purchased Perrigo's publicly traded common stock between April 21, 2015 and May 2, 2017, both dates inclusive, on the Tel Aviv Stock Exchange and were damaged thereby; and
- (3) All persons who owned Perrigo common stock as of November 12, 2015 and held such stock through at least 8:00 a.m. on November 13, 2015 (whether or not a person tendered their shares in response to tender offer of Mylan, N.V.).

Excluded from these Classes are the Defendants, any current or former officers or directors of Perrigo, the immediate family members of any Defendant or any current or former officer or director of Perrigo, and any entity that any Defendant owns or controls, or owned or controlled during the Class Period.

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

**PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY.
YOUR RIGHTS MAY BE AFFECTED BY PROCEEDINGS IN THIS ACTION.**

This Notice is being sent pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the District of New Jersey (the "Court"), entered November 14, 2019, certifying the above-captioned Action as a class action. The purpose of this Notice is to inform you of: (a) the pendency of the above-captioned class action in the United States District Court for the District of New Jersey (the "Action"); (b) the certification of the three Classes defined above, of which you may be a member ("Class Member"); and (c) your right to be excluded from the Classes. This Action has not been settled and continues to be litigated. Accordingly, no claim form need be filed at this time.

YOU ARE HEREBY NOTIFIED of the pendency of this Action as a class action. This Notice is directed to you because you may be a member of one or more Classes whose rights might be affected by this Action. If you are uncertain whether you are a member of the Class(es), contact Class Counsel listed below or consult your own attorney.

A class action is a type of lawsuit in which one or several individuals or entities prosecute claims on behalf of all members of a group of similarly situated persons and entities to obtain monetary

or other relief for the benefit of the entire group, known as a class. Class actions are used to decide legal and factual issues that are common to all members of a class.

OVERVIEW AND STATUS OF THIS ACTION

This Action is a securities class action lawsuit alleging violations of Sections 10(b), 14(e) and 20(a) of the Securities Exchange Act of 1934 and certain claims under Israeli law. This lawsuit asserts that Defendants made material misrepresentations and omissions regarding: (a) the performance and integration of Omega, which Perrigo acquired in early 2015; and (b) Perrigo's pricing strategy, noncompetitive practices, and the competitive environment for Perrigo's generic prescription drug unit. Defendants are Perrigo, Joseph Papa, Perrigo's former Chief Executive Officer, and Judy Brown, Perrigo's former Chief Financial Officer.

This Action was commenced on May 18, 2016. On February 10, 2017, the Court issued an Order appointing Perrigo Institutional Investor Group (consisting of Migdal Insurance Company Ltd., Migdal Makefet Pension and Provident Funds Ltd., Clal Insurance Company Ltd., Clal Pension and Provident Ltd., Atudot Pension Fund for Employees and Independent Workers Ltd., and Meitav DS Provident Funds and Pension Ltd.) as Lead Plaintiff and appointing Pomerantz LLP and Bernstein Litowitz Berger & Grossmann LLP as co-Lead Counsel.

On June 21, 2017, Lead Plaintiff filed its Amended Complaint for Violation of Federal Securities Laws (the "Amended Complaint"). On August 21, 2017, Defendants moved to dismiss the Amended Complaint. On July 27, 2018, the Court issued an Order granting in part and denying in part Defendants' motion to dismiss.

On November 30, 2018, Lead Plaintiff filed a motion for class certification. On November 14, 2019, the Court certified the Classes defined above, appointed Lead Plaintiff to serve as Class Representative, and appointed Pomerantz LLP and Bernstein Litowitz Berger & Grossmann LLP as Class Counsel.

Defendants deny all claims and wrongdoing asserted in the Action and any liability arising out of the conduct alleged in the Amended Complaint.

Discovery in this Action is ongoing. The Court has not yet set a deadline for filing summary judgment motions or scheduled a trial date.

INSTRUCTIONS TO CLASS MEMBERS

YOUR RIGHTS AS A CLASS MEMBER: If you purchased or otherwise acquired Perrigo's common stock between April 21, 2015 and May 2, 2017 ("the Class Period") or held Perrigo shares as of November 12, 2015 and through at least 8:00 a.m. on November 13, 2015, you are a member of one or more Classes. ***If you choose to remain a Class Member, you do not need to do anything at this time.*** You will automatically be included in the Class(es) unless you request exclusion in accordance with the procedure set forth below. Your decision is important for the following reasons:

If you choose to remain in the Class(es), you will be bound by all orders and judgments in this Action, whether favorable or unfavorable. If the Classes prevail on the common issues, or if a settlement is reached, you may be able to recover an award. If Defendants prevail, you may not pursue a lawsuit on your own behalf with regard to any of the issues decided in this Action. Your interests are being represented by the Class Representative and Class Counsel. You will not be

personally responsible for attorneys' fees or costs unless you hire your own individual attorney. Class Counsel has agreed to represent the Classes on a contingent fee basis, which means that it will be awarded fees and costs only if it succeeds in obtaining a recovery from one or more of the Defendants. Any attorneys' fees and costs will be awarded by this Court from the settlement or judgment, if any, obtained on behalf of the Classes. You may remain a member of the Class(es) and elect to be represented by counsel of your own choosing. If you retain your own separate counsel, you will be responsible for that counsel's fees and expenses, and such counsel must enter an appearance on your behalf by filing a Notice of Appearance with the Court and mailing it to Class Counsel at the address set forth below **on or before December 3, 2020**.

If you seek to share in any Class recovery, you will be required to prove your membership in the Class(es) with evidence of your purchases, acquisitions, sales and holdings of Perrigo common stock during the Class Period. In addition, Defendants may seek to prove that you did not rely on the integrity of the market or that you had knowledge of Defendants' alleged misrepresentations or omissions.

If you choose to be excluded from the Class(es), you will not be bound by any judgment in this Action, nor will you be eligible to share in any recovery that might be obtained in this Action. If you choose to be excluded, or in other words, "opt-out" of the Action, you may individually pursue any legal rights that you may have against any of the Defendants. Please note that if you exclude yourself from the Class(es) and decide to pursue your own action individually, you may not be able to pursue certain claims due to the lapsing of the statute of limitations and/or statute of repose.

HOW TO BE EXCLUDED FROM THE CLASSES: If you fall within one or more of the Class definitions and are not otherwise excluded, you will automatically be considered a member of such Class unless you request exclusion. Any member of a Class may request not to be bound by these proceedings. To exclude yourself from the Class(es), you must send a signed letter by mail stating that you "request exclusion" from the Class(es) in "*Roofer's Pension Fund v. Papa, et al.*," No. 16-CV-2805-MCA-LDW." Be sure to include: (i) your name, address, and telephone number, (ii) the transactional details of the Perrigo common stock you purchased, acquired, sold and/or held during the Class Period, including purchase/sale dates, amount of shares purchased or sold, the price of such purchases or sales, and the number of shares held as of market close on November 12, 2015 at least through 8:00 a.m. eastern time on November 13, 2015; and (iii) the signature of the person or entity requesting exclusion or an authorized representative. Your request for exclusion will not be effective unless it contains all of this information. You must then mail your exclusion request, ***postmarked no later than December 3, 2020***, to:

Perrigo Securities Litigation
c/o JND Legal Administration
P.O. Box 91374
Seattle, WA 98111

You cannot exclude yourself from the Class(es) by telephone or e-mail. If your request for exclusion is timely mailed and follows the above requirements, you will not be bound by any judgment in this Action. However, if you validly request exclusion, then you will not be eligible to share in any recovery in this Action. Do not request exclusion if you wish to participate in this Action as a Class Member.

CLASS COUNSEL: Class Counsel are Pomerantz LLP (attn: Joshua Silverman), 10 S. LaSalle Street, Chicago, IL 60603, (312) 377-1181 and Bernstein Litowitz Berger & Grossmann LLP (attn: James Harrod), 1251 Avenue of the Americas, New York, NY 10020, (212) 554-1400.

PLEASE KEEP YOUR ADDRESS CURRENT: To assist the Court and the parties in maintaining an accurate list of Class Members, please update your name and contact information. To update this information online, visit www.PerrigoSecuritiesLitigation.com or mail this information to: Perrigo Securities Litigation, c/o JND Legal Administration, PO Box 91374, Seattle, WA 98111. If this Notice was forwarded to you by the postal service, or it was otherwise sent to you at an address that is no longer current, you should immediately contact the Notice Administrator and provide them with your current address. If the Notice Administrator does not have your current address, you may not receive notice of important developments in this Action or information about any settlements obtained for the benefit of the Classes.

WHERE YOU CAN FIND ADDITIONAL INFORMATION: This Notice provides only a summary of the lawsuit and the claims asserted by plaintiffs. For more detailed information, you may contact Class Counsel or call the Notice Administrator at 833-674-0175 or visit www.PerrigoSecuritiesLitigation.com. **PLEASE DO NOT CALL OR WRITE THE COURT OR THE OFFICE OF THE CLERK FOR INFORMATION OR ADVICE.**

SPECIAL NOTICE TO BANKS, BROKERS, AND OTHER NOMINEES: If you purchased or otherwise acquired Perrigo common stock during the Class Period or held Perrigo common stock as of the market close on November 12, 2015 and through at least 8:00 a.m. eastern time on November 13, 2015 for the beneficial interest of any person or entity other than yourself, you must, **WITHIN SEVEN (7) DAYS OF YOUR RECEIPT OF THIS NOTICE**, either (a) request from the Notice Administrator sufficient copies of the Summary Notice to forward to all such beneficial owners and within seven (7) calendar days of receipt of those Summary Notices forward them to all such beneficial owners; or (b) provide a list of the names and the last known addresses of each person or entity for whom or which you purchased such securities during the relevant period to the Notice Administrator.

If you select option (a) above, you must send a statement to the Notice Administrator confirming that the mailing was made, and you must retain your mailing records for use in connection with any further notices that may be provided in this Action. If you select option (b), the Notice Administrator will send a copy of the Summary Notice to the beneficial owners. All written communications concerning the foregoing should be addressed to the Notice Administrator at:

Perrigo Securities Litigation
c/o JND Legal Administration
PO Box 91374
Seattle, WA 98111

You are entitled to reimbursement for your reasonable expenses actually incurred in complying with the foregoing, including reimbursement of reasonable postage expenses and the reasonable costs of obtaining the names and addresses of beneficial owners, not to exceed \$0.15 plus actual postage at the current pre-sort rate used by the Notice Administrator per notice you mailed, \$.05 per notice you e-mailed, or \$0.10 per name and address you provided to the Notice Administrator, and subject to further order of the Court with respect to any dispute concerning such reimbursement. Those reasonable expenses and costs will be paid upon request and submission of appropriate supporting documentation. All requests for reimbursement should be sent to the Notice Administrator.

Dated: July 10, 2020

BY ORDER OF THE COURT
United States District Court
District of New Jersey