SRF 77238

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Counsel to the Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re

ENDO INTERNATIONAL plc, et al.,

Debtors.1

Chapter 11

Case No. 22-22549 (JLG)

(Jointly Administered)

Related Docket Nos. 3687 & 3756

NOTICE OF AGREEMENTS WITH UNITED STATES DEPARTMENT OF JUSTICE

PLEASE TAKE NOTICE that on January 12, 2024, the Bankruptcy Court for the Southern District of New York (the "Court") entered the Order (I) Scheduling a Combined Hearing for Approval of the Disclosure Statement and Confirmation of the Plan; (II) Conditionally Approving the Adequacy of the Disclosure Statement; (III) Approving (A) Procedures for Solicitation, (B) Forms of Ballots and Notices, (C) Procedures for Tabulation of Votes, and (D) Procedures for Objections; and (IV) Granting Related Relief [Docket No. 3549] (the "Disclosure Statement Order"), which, among other things, conditionally approved the Disclosure Statement with Respect to the Second Amended Joint Chapter 11 Plan of

The last four digits of Debtor Endo International plc's tax identification number are 3755. Due to the large number of debtors in these chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://restructuring.ra.kroll.com/Endo. The location of the Debtors' service address for purposes of these chapter 11 cases is: 1400 Atwater Drive, Malvern, PA 19355.

Reorganization of Endo International plc and its Affiliated Debtors [Docket No. 3548] (the "Disclosure Statement).

PLEASE TAKE FURTHER NOTICE that on January 25, 2024, in accordance with the Disclosure Statement Order, the Debtors commenced solicitation on the *Second Amended Joint Chapter 11 Plan of Reorganization of Endo International plc and its Affiliated Debtors* [Docket No. 3535] (as may be modified, amended, or supplemented from time to time, the "<u>Plan</u>").

PLEASE TAKE FURTHER NOTICE that, as contemplated by the Plan and the Disclosure Statement Order, on February 15, 2024, the Debtors filed the *Notice of Filing of Plan Supplement* [Docket No. 3687] (as may be modified, amended, or supplemented from time to time, the "Plan Supplement"), which attached as Exhibit 16 thereto an update on potential resolutions with the United States Department of Justice (the "DOJ"), in connection with certain claims filed by the DOJ against the Debtors (the "DOJ Claims").

PLEASE TAKE FURTHER NOTICE that on February 29, 2024, the Debtors filed the *Notice of Filing of Agreements with United States Department of Justice* [Docket No. 3756] (the "Notice"), which attached thereto three definitive agreements (the "Agreements")² that, collectively, address the Claims as set forth in the Agreements.

PLEASE TAKE FURTHER NOTICE that the Agreements shall be deemed to replace Exhibit 16 of the previously-filed Plan Supplement, and shall be deemed included in the Plan Supplement.

PLEASE TAKE FURTHER NOTICE that attached to the Notice as Exhibit A is a global economic agreement (the "Global Agreement"), which incorporates the terms of the Proposed Economic Resolution and resolves those DOJ Claims not resolved pursuant to the Plea Agreement and Civil Settlement Agreement (each as defined below).

Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to them in the Notice (as defined herein), the Plan (as defined herein), or the Disclosure Statement, as applicable.

PLEASE TAKE FURTHER NOTICE that attached to the Notice as Exhibit B is a misdemeanor plea agreement (the "Plea Agreement"), which resolves the DOJ's criminal investigations of the Debtors.

PLEASE TAKE FURTHER NOTICE that attached to the Notice as Exhibit C is a civil settlement agreement (the "<u>Civil Settlement Agreement</u>"), which resolves the DOJ's civil investigations of the Debtors.

PLEASE TAKE FURTHER NOTICE that each of the Agreements remains subject to, among other conditions precedent, Court approval and the confirmation and consummation of the Debtors' Plan.

PLEASE TAKE FURTHER NOTICE that the Plan Supplement, including the Agreements, may be obtained at no charge from the Debtors' claims and noticing agent, Kroll Restructuring Administration, LLC ("Kroll") by visiting the website maintained by Kroll at https://restructuring.ra.kroll.com/Endo (the "Case Website") and (a) clicking "Plan & Disclosure Statement" located within the "Quick Links" section of the left hand navigation panel or (b) contacting Kroll via the "Live Chat" feature at the "Info Center" panel of the landing page.

PLEASE TAKE FURTHER NOTICE that the Confirmation Hearing is scheduled to commence on March 19, 2024 at 10:00 a.m. (prevailing Eastern Time) before the Court.

PLEASE TAKE FURTHER NOTICE that copies of the Plan, the Disclosure Statement, and any underlying exhibits thereto can be viewed and/or obtained (i) by accessing the Court's website at www.nysb.uscourts.gov, (ii) by contacting the Office of the Clerk of the Court at United States Bankruptcy Court for the Southern District of New York, or (iii) on the Case Website at https://restructuring.ra.kroll.com/Endo; or by contacting Kroll directly at (877) 542-1878 (toll free for callers within the United States and Canada) and (929) 284-1688 (for international callers).

Dated: February 29, 2024 New York, New York

/s/ Paul D. Leake

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