

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

All Cases Noted on Attached Appendix

MDL No. 2804

Case No. 1:17-md-2804

JUDGE DAN AARON POLSTER

**STIPULATION OF DISMISSAL WITH PREJUDICE
PURSUANT TO NEW MEXICO SETTLEMENT AGREEMENT**

The undersigned Parties (the “Parties”) have settled the above-referenced litigation against Defendants Walgreen Co., Walgreen Eastern Co., Inc., and Walgreens Boots Alliance, Inc. (together, “Walgreen”¹) pursuant to the Walgreen New Mexico *Settlement Agreement and Full Release of Claims*, executed on March 7, 2023, attached here as Appendix B, in which Plaintiffs, the New Mexico subdivisions listed in Appendix C have elected to participate.² Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Walgreen agree that all claims of Plaintiffs in the actions identified in Appendix C against Walgreen or any other Released Entity, including any entity identified in Appendix A, are dismissed with prejudice, with each party to bear its own costs.

¹ The Released Entities are each and every entity of any of the Walgreen Defendants that are “Releasees” as defined in the Walgreen New Mexico *Settlement Agreement and Full Release of Claims*, executed on March 7, 2023. *See* App. B. Appendix A, also attached hereto, represents a good faith effort by the Walgreen Defendants to list all Released Entities that may be individually named in any of the Plaintiffs’ complaints. Appendix A is not intended to limit the scope of Released Entities, and to the extent that Plaintiffs or Walgreen Defendants subsequently identify any Released Entity that should have been included on Appendix A, they will inform the Clerk of the Court.

² To the extent any Plaintiff Subdivision is inadvertently included on Appendix C, the Court retains jurisdiction to hear those disputes. In advance of raising any such issue with the Court, the Plaintiff Subdivision must meet and confer with defense counsel and Plaintiffs’ Liaison Counsel.

Dated: May 13, 2025

Respectfully submitted,

Agreed as to form and substance:

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Walgreens Boots Alliance, Inc. and its
Releasees*

SO ORDERED this 14th day of May, 2025.

s/Dan Aaron Polster

Hon. Dan Aaron Polster
United States District Judge

APPENDIX A

Illustrative List of Released Entities Potentially Named in Plaintiffs' Complaints¹

CuraScript Infusion Pharmacy Inc.

Duane Reade Inc.

SAJ Distributors²

WAGDCO, LLC

Walgreen Co.

Walgreen Eastern Co., Inc.

Walgreen of New Mexico, Inc.

Walgreens of New Mexico, Inc.

Walgreen Pharmacy

Walgreens Boots Alliance, Inc.

Walgreens Specialty Pharmacy, LLC

Walgreens.com, Inc.

Walgreens-Optioncare, Inc.

¹ By including an entity in this list, Walgreen Co., Walgreen Eastern Co., Inc., and Walgreens Boots Alliance, Inc. do not admit that they currently maintain control over the entity.

² Including Stephen L. LaFrance Pharmacy, Inc., formerly d/b/a SAJ Distributors.

APPENDIX C

<u>Docket Number</u>	<u>Plaintiff Name</u>	<u>Plaintiff State</u>
1:17-op-45080	Mora County	NM
1:18-op-45776	Santa Fe County	NM
1:18-op-45829	San Juan County	NM
1:18-op-46206	Dona Ana County	NM
1:18-op-46343	Roosevelt County	NM
1:19-op-45033	McKinley County	NM
1:19-op-45051	Taos County	NM
1:19-op-45054	Rio Arriba County	NM
1:19-op-45108	Grant County	NM
1:19-op-45216	Otero County	NM
1:19-op-45266	Lea County	NM
1:19-op-45301	Bernalillo County	NM
1:19-op-45320	Catron County	NM
1:19-op-45321	Cibola County	NM
1:19-op-45322	Sierra County	NM
1:19-op-45323	Socorro County	NM
1:19-op-45324	Valencia County	NM
1:19-op-45347	Curry County	NM
1:19-op-45354	San Miguel County	NM
1:19-op-45421	Sandoval County	NM
1:19-op-45513	Lincoln County	NM
1:19-op-46067	Alamogordo City	NM
1:19-op-46068	Hobbs City	NM
1:19-op-46069	Hidalgo County	NM
1:19-op-46142	Española City	NM
1:21-op-45055	Colfax County	NM
1:21-op-45056	Luna County	NM
1:21-op-45057	Union County	NM
1:21-op-45059	Las Cruces City	NM
1:22-op-45004	Torrance County	NM
1:22-op-45015	Eddy County	NM