

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

GOVERNMENT EMPLOYEES HEALTH
ASSOCIATION, on behalf of itself and all
other similarly situated,

Plaintiff,

v.

ACTELION PHARMACEUTICALS LTD., *et*
al.,

Defendants.

Case No. 1:18-cv-3560-GLR

**PLAINTIFF’S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
PROPOSED SETTLEMENT, APPROVAL OF THE FORM AND MANNER OF NOTICE
TO THE CLASS, AND SCHEDULE FOR A FAIRNESS HEARING**

Plaintiff Government Employees Health Association (“GEHA” or “Plaintiff”) on behalf of itself and the certified Class of Third Party Payors (the “Class”) respectfully moves pursuant to Rules 23 of the Federal Rules of Civil Procedure for preliminary approval of Plaintiff’s settlement with Defendants Actelion Pharmaceuticals Ltd., Actelion Pharmaceuticals U.S., Inc., and Janssen Research & Development, LLC (collectively, “Defendants”); preliminary approval of the proposed Plan of Allocation and Distribution; approval of the proposed Notice Plan and Notices to the Class; approval of the proposed Claim Form; appointment of the Notice and Claims Administrator, and Escrow Agent; and setting a schedule for a Fairness Hearing and Final approval of the proposed Settlement (the “Motion”). In support of the Motion, Plaintiff relies on the accompanying Memorandum of Law and the Declaration of Sharon K. Robertson and exhibits thereto, as well as a proposed Preliminary Approval Order.

Dated: March 4, 2025

Respectfully submitted,

/s/ Sharon K. Robertson

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Counsel for Plaintiff and the Class

CERTIFICATE OF SERVICE

I hereby certify that this document was served on counsel of record via the Court's ECF System on March 4, 2026.

Dated: March 4, 2026

/s/ Sharon K. Robertson
Sharon K. Robertson