UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

RACHAEL MAHER, et al., individually and on behalf of others similarly situated,

: Civil Action No. 2:20-CV-00152-JXN-JBC

Plaintiffs,

v.

AMAG PHARMACEUTICALS, INC.,

Defendant.

: NOTICE OF UNOPPOSED MOTION FOR
: PRELIMINARY APPROVAL OF CLASS
: ACTION SETTLEMENT, CERTIFYING
: A SETTLEMENT CLASS FOR
: SETTLEMENT PURPOSES, APPROVING
: THE PARTIES' PROPOSED NOTICE
: PROGRAM, SETTING A FINAL
: APPROVAL HEARING DATE, AND
: GRANTING RELATED RELIEF

To:

David R. Kott McCarter & English, LLP Four Gateway Center 100 Mulberry Street Newark, NJ 07101-0652 Lauren S. Colton Marc A. Marinaccio Hogan Lovells US LLP 100 International Drive, Suite 2000 Baltimore, MD 21202

PLEASE TAKE NOTICE that on June 2, 2025 at 9 AM or as soon thereafter as counsel may be heard, Plaintiffs Rachel Maher, Marina Gomez, Rebecca Torres, Brittany Bonds, Teresa Faughnan, Ebony Odommorris, Molly O'Hara and Brandy Silas (collectively, "Plaintiffs"), pursuant to Fed. R. Civ. P. 23(e), will move before Hon. Julien Xavier Neals, U.S.D.J., for an Order granting preliminary approval of the parties' proposed class action settlement, certifying a settlement Class for settlement purposes, approving the parties' proposed Notice Program, setting a final approval hearing date, and granting related relief further detailed in the accompanying papers. Defendant does not oppose this motion.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs will rely upon the accompanying Memorandum of Law, the Joint Declaration of Bruce D. Greenberg, Richard M. Paul, Laura C. Fellows, and Stuart Talley, and the Declaration of Michael Lynch regarding notice. A proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that Plaintiffs request oral argument.

LITE DEPALMA GREENBERG & AFANADOR, LLC

/s/ Bruce D. Greenberg Dated: May 8, 2025

> Bruce D. Greenberg 570 Broad Street, Suite 1201 Newark, New Jersey 07102 Telephone: (973) 877-3820 bgreenberg@litedepalma.com

PAUL LLP

Richard M. Paul III (pro hac vice) Laura C. Fellows (pro hac vice) 601 Walnut Street, Suite 300 Kansas City, Missouri 64106 Telephone: (816) 984-8100 Rick@PaulLLP.com Laura@PaulLLP.com

KERSHAW TALLEY BARLOW

Stuart Talley (pro hac vice) 401 Watt Avenue Sacramento, California 95864 Telephone: (916) 779-7000 stuart@kctlegal.com