

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK
In re Chantix (Varenicline) Mktg., Sales Pracs. & Prods. Liab. Litig. (No. II) 22-MD-3050
(KPF), 22-MC-3050 (S.D.N.Y.)

If You Are a Third Party Payor Who Paid Any Amount of Money for Retail Purchases of Chantix in the United States and Its Territories from September 29, 2015 through September 17, 2021, You May Be Entitled to a Payment from a Class Action Settlement.

A court authorized this notice. You are not being sued. This is not a solicitation from a lawyer.

- A Settlement has been reached in a putative class action lawsuit claiming that Pfizer Inc. (“Pfizer”) manufactured and sold its branded drug Chantix, which Plaintiffs alleged contained an undisclosed nitrosamine. Pfizer believes it did nothing wrong and denies violating any law but has agreed to the Settlement to avoid the uncertainties and expenses associated with continuing the case.
- You are included if you paid any amount of money for retail purchases of Chantix in the United States and its territories from September 29, 2015 through September 17, 2021. Third Party Payors included in the Settlement will be eligible to receive a *pro rata* portion of the Settlement Fund, which will be based on the total amount of qualifying and documented payments.
- Read this notice carefully. Your legal rights are affected whether you act, or do not act.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM BY SEPTEMBER 14, 2026	This is the only way to receive a payment.
EXCLUDE YOURSELF BY SEPTEMBER 14, 2026	You will receive no benefits, but you will retain any rights you currently have to sue Pfizer about the claims in this case.
OBJECT BY SEPTEMBER 14, 2026	Write to the Court explaining why you do not like the Settlement.
GO TO THE HEARING ON OCTOBER 13, 2026	Ask to speak in Court about your opinion of the Settlement.
DO NOTHING	You will not receive a share of the Settlement benefits and will give up your rights to sue Pfizer about the claims in the case.

These rights and options—**and the deadlines to exercise them**—are explained in this Notice.

BASIC INFORMATION

1. Why was this Notice issued?

A Court authorized this notice because you have a right to know about a proposed Settlement of this putative class action lawsuit and about all of your options, before the Court decides whether to give final approval to the Settlement. This Notice explains the lawsuit, the Settlement, and your legal rights.

The Honorable Katherine Polk Failla, of the U.S. District Court for the Southern District of New York, is overseeing this case. The case is called *In re Chantix (Varenicline) Mktg., Sales Pracs. & Prods. Liab. Litig.* (No. II) 22-MD-3050 (KPF), 22-MC-3050 (S.D.N.Y.). The people who sued are called the Plaintiffs. The Defendant is Pfizer.

2. What is a class action?

In a putative class action, one or more people called plaintiffs or class representatives (in this case, Juan Abreu, Teresa Baptiste, Timothy Bleeker, Harold Bradley, Sharon Carroll, Karen Duff, Albert Edwards, Tara Evans, Lillian Forrest, Kimberly Hill, Valerie Hogue, Douglas Houghton, James Jacobson, Tammy LaMotte, Kathleen Lima, Deborah Seeley, Daniel Spence, Hazel Taylor, Carita Thompson, Daphne Walter, and Shannon Webb a/k/a Shannon Alicea (the “Consumer Plaintiffs”) and County of Monmouth, MSP Recovery Claims Series 44, LLC, MSP Recovery Claims, Series LLC, and Ohio Carpenters’ Health Fund (“TPP Plaintiffs”)) sue on behalf of a group or a “class” of people who have similar claims. If the court determines the case can proceed as a class action, the court resolves the issues for all class members, except for those who exclude themselves from the class.

3. What is this lawsuit about?

Plaintiffs alleged that Pfizer failed to comply with current good manufacturing practices, which resulted in Chantix becoming contaminated with a nitrosamine and asserted claims for: (1) breach of express warranties; (2) breach of implied warranties; (3) violation of the Magnuson-Moss Warranty Act, 15 U.S.C. § 2301 *et seq.*; (4) fraud (affirmative misrepresentation, omission, and concealment); (5) negligent misrepresentation and omission; (6) violation of state consumer protection laws; (7) negligence; (8) negligence per se; and (9) unjust enrichment. The Court issued prior orders that limited the claims to Plaintiffs’ consumer protection claims and certain unjust enrichment and negligent misrepresentation claims to proceed based on the “cGMP Misstatement, *i.e.*, that Pfizer misrepresented its adherence to current Good Manufacturing practices in its manufacturing of Chantix.” Pfizer believes it did nothing wrong and denies violating any law. The Court has not determined who is right. Rather, the Parties have agreed to settle the lawsuit to avoid the uncertainties and expenses associated with ongoing litigation.

4. Why is there a Settlement?

The Court has not decided whether the Plaintiffs or Pfizer should win this case. Instead, both sides agreed to this Settlement. That way, they avoid the uncertainties and expenses associated with ongoing litigation, and Settlement Class Members are guaranteed to receive compensation, and sooner rather than, if at all, after the completion of a trial.

WHO'S INCLUDED IN THE SETTLEMENT?

5. How do I know if I am in the Settlement Class?

The Court decided that everyone who fits the following description is a member of the **Settlement Class**:

All individuals and third-party payors who paid any amount of money for retail purchases of Chantix in the United States and its territories from September 29, 2015 through September 17, 2021.

The following groups have been excluded from the Settlement Class in this case:

- a. Pfizer and its officers, directors, managers, employees, subsidiaries, and affiliates;
- b. Government agencies or governmental actors, including, without limitation, any state Attorney General office; and
- c. Any entity that previously opted out of the Settlement Class in this Action.

THE SETTLEMENT BENEFITS

6. What does the Settlement provide?

In consideration of the full and complete release of all Released Claims against Pfizer, and the dismissal of the lawsuit with prejudice, Pfizer agrees to provide the following consideration to the Settlement Class: Pfizer will pay \$44,000,000.00.

The net Settlement Fund available for distribution to the Settlement Class, after deduction of any attorneys' fees, litigation expenses, settlement administration and notice expenses, and class representative service awards that may be ordered by the Court, shall be first allocated between consumers (described in a separate notice to the Consumer Settlement Class) up to a maximum of 20% of the Available Settlement Fund, with the remainder allocated to third-party payors ("TPPs"); allocation to Third-Party Settlement Class Members will be as follows:

For Third-Party Payors: After a determination of the total fund to be allocated to Third-Party Payors, each Third-Party Payor class member that submits an eligible claim will receive a *pro-rata* share of the funds based on dollars paid as documented in claim forms and supporting documents submitted.

A detailed description of the Settlement benefits can be found in the Settlement Agreement, a copy of which is accessible on the Settlement Website by clicking [here](#).

7. How will my payment be determined?

Third-Party Payor Settlement Class Members (including assignees of TPPs) shall submit Claim Forms documenting their (or their assignors') payments for Pfizer as provided in the Settlement Agreement and approved by the Court. The Settlement Administrator will review the Claim Forms and any supporting documentation with particular attention to the possibility of fraudulent or mistaken claims. After payment of the consumer claims as provided above, the remainder of the Settlement Fund shall be distributed to each valid Third-Party Payor Settlement Class Member (including assignees) on a *pro rata* basis according to the total amount of each TPP's qualifying and documented payments.

If you are an eligible Settlement Class Member, you must submit a Claim Form to receive a Settlement payment. You can submit your Claim Form online at the Settlement Website, www.ChantixSettlement.com, or download a paper Claim Form from the Settlement Website and submit it by mail. You will be required to submit supporting documentation. Assignees of third-party payors may directly submit claims to obtain settlement funds. Such assignees will be treated as if the third-party payor had directly submitted its claims as part of the claims administration process, and it will have the same rights as a third-party payor. Settlement Class Members are limited to one claim per Settlement Class Member. Related companies, such as corporate subsidiaries or affiliates, may file claims either separately or combined. In no event shall more than one Settlement Class Member assert a claim for the same payments. Your Claim Form must be submitted online or postmarked by **September 14, 2026**.

8. When will I get my payment?

The hearing to consider the fairness of the Settlement is scheduled for **October 13, 2026 at 3 p.m.**. Please note that the fairness hearing date is subject to change without further notice. If the Court approves the Settlement, there may be appeals. It is always uncertain when appeals will be resolved, and even if no appeals are filed, it also takes time for the Settlement Administrator to process all claims and make payments. Please be patient.

HOW TO GET BENEFITS

9. How do I get a payment?

Third-Party Payor Settlement Class Member (including assignees of TPPs) shall submit Claim Forms documenting their (or their assignors') payments for Chantix as provided in the Settlement Agreement and approved by the Court. The Settlement Administrator will review the Claim Forms and any supporting documentation with particular attention to the possibility of fraudulent or mistaken claims. After payment of the consumer claims as provided above, the remainder of the Settlement Fund shall be distributed to each valid Third-Party Payor Settlement Class Member (including assignees) on a *pro rata* basis according to the total amount of each TPP's qualifying and documented payments.

If you are an eligible Settlement Class Member, you must submit a Claim Form to receive a Settlement payment. You can submit your Claim Form online at the Settlement Website by **September 14, 2026** or download a paper Claim Form from the Settlement Website and submit it by mail. You will be required to submit supporting documentation. Settlement Class

Members are limited to one claim per Settlement Class Member. A Third-Party Payor Settlement Class Member or an authorized agent can complete this Claim Form. If both a Settlement Class Member and its authorized agent submit a Claim Form, the Settlement Administrator will only consider the Settlement Class Member's Claim Form. The Settlement Administrator may request supporting documentation. The claim may be rejected if any requested documentation is not provided in a timely manner. In no event shall more than one Settlement Class Member assert a claim for the same payments. Your Claim Form must be submitted online or postmarked by **September 14, 2026**.

REMAINING IN THE SETTLEMENT

10. What am I giving up if I stay in the Settlement Class?

If the Settlement becomes final, you will give up your right to sue Pfizer and other Released Parties for the claims being resolved by this Settlement. The specific claims you are giving up against Pfizer are described in the Settlement Agreement. You will be “releasing” Pfizer and certain of its subsidiaries, affiliates, employees, and representatives as described in Section 3 of the Settlement Agreement. Unless you exclude yourself (*see* Question 13), you are “releasing” the claims, regardless of whether you claim your payment or not. The Settlement Agreement is available through the “Court Documents” link on the Settlement Website.

The Settlement Agreement describes the released claims with specific descriptions, so read it carefully. If you have any questions, you can talk to the lawyers listed in Question 11 for free or you can, of course, talk to your own lawyer if you have questions about what this means.

THE LAWYERS REPRESENTING YOU

11. Do I have a lawyer in the case?

Yes, if you do not exclude yourself from the Settlement Class by opting out. The Court has appointed Ruben Honik and David J. Stanoch of Honik LLC, Charles E. Schaffer of Levin Sedran & Berman LLP, and Joseph P. Guglielmo of Scott+Scott Attorneys at Law LLP to be the attorneys representing the Settlement Class. They are called “Class Counsel.” They believe, after conducting an extensive investigation, that the Settlement Agreement is fair, reasonable, and in the best interests of the Settlement Class. You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense.

12. How will the lawyers be paid?

Class Counsel will petition for attorneys' fees and costs that may be paid out of the Settlement Fund in an amount to be determined by the Court. The fee petition will seek no more than one-third of the Settlement Fund, plus reimbursement of their costs and expenses.

Under the Settlement Agreement, any amount awarded to Class Counsel will be paid out of the Settlement Fund.

Subject to approval by the Court, Plaintiff intends to seek service awards for the Class Representatives from the Settlement Fund in the amount of \$15,000 each for TPP Plaintiffs and \$5,000 each for Consumer Plaintiffs for their services in helping to bring and resolve this case.

EXCLUDING YOURSELF FROM THE SETTLEMENT

13. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must submit a request for exclusion by **11:59 P.M. EST on September 14, 2026**. Requests for exclusion may be submitted either on the Settlement Website (via the online form accessible [here](#)) or by mailing or otherwise deliver a letter (or request for exclusion) stating that you want to be excluded from the *In re Chantix (Varenicline) Mktg., Sales Pracs. & Prods. Liab. Litig.* (No. II) 22-MD-3050 (KPF), 22-MC-3050 (S.D.N.Y.) Settlement. Your letter or request for exclusion must also include your full name and current address, a statement that you purchased Chantix in the United States and its territories between September 29, 2015 through September 17, 2021, your signature, the name and number of this case, and a statement that you wish to be excluded. If you choose to submit a request for exclusion by mail, you must mail or deliver your exclusion request, postmarked no later than **September 14, 2026**, to the following address:

Chantix Settlement
c/o A.B. Data, Ltd.
P.O. Box 173137
Milwaukee, WI 53217

Any purported group, “mass,” or “class-wide” opt-outs shall not be permitted and shall be construed as being submitted only on behalf of the person who actually submitted the request for exclusion or objection. A request for exclusion must be submitted by each Settlement Class Member on an individual basis, and any request for exclusion by a purported authorized agent or representative of a Settlement Class Member must be signed by the Settlement Class Member and include proof of the representative’s legal authority and authorization to act and object to or request exclusion on behalf of each Settlement Class Member for which the representative requests exclusion.

14. If I do not exclude myself, can I sue Pfizer for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Pfizer for the claims being resolved by this Settlement.

15. If I exclude myself, can I get anything from this Settlement?

No. If you exclude yourself, you will not receive any payment from the Settlement Fund.

OBJECTING TO THE SETTLEMENT

16. How do I object to the Settlement?

If you are a Settlement Class Member, you can object to the Settlement if you do not like any part of it. The deadline to object is **September 14, 2026**. You can give reasons why you think the Court should not approve it. The Court will consider your views. To object, you must file with the Court a letter or brief stating that you object to the Settlement in *In re Chantix (Varenicline) Mktg., Sales Pracs. & Prods. Liab. Litig.* (No. II) 22-MD-3050 (KPF), 22-MC-3050 (S.D.N.Y.) and identify all your reasons for your objections (including citations and supporting evidence) and attach any materials you rely on for your objections. Your letter or brief must also include your name, your address, the basis upon which you claim to be a Settlement Class Member, the name and contact information of any and all attorneys representing, advising, or in any way assisting you in connection with your objection, and your signature. If you, or an attorney assisting you with your objection, have ever objected to any class action settlement where you or the objecting attorney has asked for or received payment in exchange for dismissal of the objection (or any related appeal) without modification to the settlement, you must include a statement in your objection identifying each such case by full case caption. You must also mail or deliver a copy of your letter or brief to Class Counsel and Pfizer's Counsel listed below.

Objections must be filed via the Court's electronic filing system, and if not filed via the Court's electronic system, must be mailed, postmarked by **September 14, 2026**, to the Court at the following address:

Clerk of the Court
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

If you want to appear and speak at the Final Approval Hearing to object to the Settlement, with or without a lawyer (explained below in Question 20), you must say so in your letter or brief. File the objection with the Court (or mail the objection to the Court) and mail a copy of the objection to Class Counsel and Pfizer's Counsel, at the addresses below, postmarked no later than **September 14, 2026**.

Class Counsel	Pfizer's Counsel
Ruben Honik Honik Law 1515 Market Street Suite 1100 Philadelphia, PA, 19102	Loren H. Brown DLA Piper LLP 1251 Avenue of the Americas, 27th Floor New York, NY 10020

17. What's the difference between objecting and excluding myself from the Settlement?

Objecting simply means telling the Court that you do not like something about the Settlement. If you object only, you will remain in the Settlement Class. Excluding yourself from the Settlement Class is telling the Court that you do not want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

18. When and where will the Court decide whether to approve the Settlement?

The Court will hold the Final Approval Hearing on **October 13, 2026 at 3:00 p.m.** in Courtroom 618 of the United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007. The purpose of the hearing will be for the Court to determine whether to approve the Settlement as fair, reasonable, adequate, and in the best interests of the Settlement Class; consider Class Counsel's request for attorneys' fees and expenses; and consider the request for service awards to the Class Representatives. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the Settlement.

The hearing may be postponed to a different date or time without notice, so it is a good idea to check for updates by visiting the Settlement Website at www.ChantixSettlement.com or calling 1-877-354-3912. If, however, you timely objected to the Settlement and advised the Court that you intend to appear and speak at the Final Approval Hearing, you will receive notice of any change in the date of the Final Approval Hearing.

19. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. But, you are welcome to come at your own expense. If you send an objection or comment, you do not have to come to Court to talk about it. As long as you filed and mailed your written objection on time, the Court will consider it. You may also pay another lawyer to attend, but it's not required.

20. May I speak at the hearing?

Yes. You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must include in your letter or brief objecting to the Settlement a statement saying that it is your "Notice of Intent to Appear in *In re Chantix (Varenicline) Mktg., Sales Pracs. & Prods. Liab. Litig.* (No. II) 22-MD-3050 (KPF), 22-MC-3050 (S.D.N.Y.)." It must include your name, address, telephone number and signature, as well as the name and address of your lawyer, if one is appearing for you. Your objection and notice of intent to appear must be filed with the Court, postmarked no later than **September 14, 2026**, and sent to the addresses listed in Question 16.

GETTING MORE INFORMATION

21. Where do I get more information?

This Notice summarizes the Settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement at www.ChantixSettlement.com. You may also write with questions to Chantix Settlement, c/o A.B. Data, Ltd., P.O. Box 173137, Milwaukee, WI 53217. You can call the Settlement Administrator at 1-877-354-3912 or Class Counsel at 212-223-6444, if you have any questions. Before doing so, however, please read this full Notice carefully. You may also find additional information elsewhere on the Settlement Website.