

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: CHANTIX (VARENICLINE)
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION II

22-MD-3050 (KPF)
22-MC-3050 (KPF)

**PLAINTIFF’S NOTICE OF UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF PROPOSED SETTLEMENT, PRELIMINARY CERTIFICATION OF
SETTLEMENT CLASS, AND APPROVAL OF NOTICE PLAN**

PLEASE TAKE NOTICE that Consumer Plaintiffs¹ and Third-Party Payor Plaintiffs² (together, “Plaintiffs”) individually and on behalf of the proposed Settlement Class in the above-captioned action, hereby move the Court pursuant to FED. R. CIV. P. 23(e) for an order preliminarily approving the proposed Settlement with Defendant Pfizer, Inc. (“Pfizer” or “Defendant”).

Submitted herewith in support of this Motion are the:

1. Plaintiffs’ Memorandum of Law in Support of their Unopposed Motion for Preliminary Approval of Proposed Settlement, Preliminary Certification of Settlement Class, and Approval of Notice Plan; and
2. Declaration of Joseph P. Guglielmo in Support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Proposed Settlement, Preliminary Certification of Settlement Class, and Approval of Notice Plan and accompanying exhibits; and
3. Proposed Order granting Preliminary Approval of Settlement.

¹ 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, Debra Seeley, Daniel Spence, Hazel Taylor, Carita Thompson, Daphne Walter, Shannon Webb a/k/a Shannon Alicea (the “Consumer Plaintiffs”).

² County of Monmouth, MSP Recovery Claims, Series 44, LLC, MSP Recovery Claims, Series LLC, and Ohio Carpenters’ Health Fund (the “TPP Plaintiffs”).

Dated: May 26, 2026

Respectfully Submitted,

/s/ Joseph P. Guglielmo
Joseph P. Guglielmo
SCOTT + SCOTT
ATTORNEYS AT LAW LLP
The Helmsley Building
230 Park Avenue
24th Floor
New York, NY 10169
Phone (215) 223-4478
jguglielmo@scott-scott.com

Ruben Honik
David J. Stanoch, Of Counsel
HONIK LLC
1515 Market St., Suite 1100
Philadelphia, PA 19102
Phone (267) 435-1300
ruben@honiklaw.com
david@honiklaw.com

Charles E. Schaffer
LEVIN SEDRAN & BERMAN LLP
510 Walnut Street, Suite 500
Philadelphia, PA 19106
Phone (215) 592-1500
cschaffer@lfsblaw.com

Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2026, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Joseph P. Guglielmo

Joseph P. Guglielmo