

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

IN RE TRICOR INDIRECT PURCHASER)	
ANTITRUST LITIGATION)	
THIS DOCUMENT RELATES TO:)	C.A. No. 05-360 (SLR)
)	(consolidated)
ALL INDIRECT PURCHASER CASES)	
)	

**INDIRECT PURCHASER PLAINTIFFS' UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF PROPOSED SETTLEMENT**

Plaintiffs Painters' District Council No. 30 Health and Welfare Fund and Richard G. Wilde, Vista Health Plan, Inc., Pennsylvania Employees Benefit Trust Fund, Allied Services Division Welfare Fund and Hector Valdes, Diana Kim, Elaine M. Pullman, Neil Perlmutter, Helena Perlmutter and Lula Ramsey, Philadelphia Federation of Teachers Health and Welfare Fund, Cindy Cronin, Charles Shain and Sandra Krone, Sheet Metal Workers International Association Local Union 28, and Alberto Litter in the class actions pending in federal court in the District of Delaware, Case Nos. C.A. No. 05-360, 05-365, 05-390, 05-394, 05-426, 05-450, 05-467, 05-482, 05-475, 05-516, and 05-695 (collectively "Class Plaintiffs"), by their counsel ("Class Counsel"), move for an order pursuant to Fed. R. Civ. P. 23 (1) granting preliminary approval to a proposed settlement of the indirect purchaser class action cases between Class Plaintiffs and Defendants Abbott Laboratories, Fournier Industrie et Sante and Laboratoires Fournier S.A; (2) granting preliminary approval to a proposed plan of allocation of the settlement amount, (3) conditionally certifying a class for settlement purposes, (4) approving the form and manner of notice, and (5) authorizing a proposed schedule for completing the approval process.

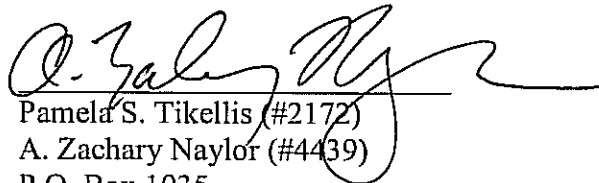
In support of this motion, Class Plaintiffs submit the following:

1. Brief in Support of Indirect Purchaser Plaintiffs' Motion for Preliminary Approval of Proposed Settlement.
2. Declaration of Co-Class Counsel David S. Nalven.
3. Declaration of Notice Expert Katherine Kinsella.

Wherefore, for the foregoing reasons, Class Plaintiffs respectfully request that this motion be granted.

Dated: May 7, 2009

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