

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

In re: Prograf Antitrust Litigation

MDL No. 2242

Civil Action No. 1:11-md-02422-RWZ

This Document Relates To:

All Direct Purchaser Class Actions

**DIRECT PURCHASER CLASS PLAINTIFFS' MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT WITH ASTELLAS
PHARMA, US, INC. ("ASTELLAS")**

Pursuant to Federal Rule of Civil Procedure 23, Direct Purchaser Class Plaintiffs ("Plaintiffs") respectfully move for entry of the Preliminary Approval Order proposed herewith (annexed as Exhibit 1hereto): (1) granting preliminary approval of the proposed Direct Purchaser Class Action settlement with Astellas; and (2) directing Plaintiffs to file a motion to approve notice to the Class, appoint a Claims Administrator, and set a schedule for implementation thereof.

The grounds for this motion are set forth in the accompanying Memorandum of Law, Declaration of Bruce E. Gerstein, and exhibits thereto.

Dated: January 22, 2015

/s/ Bruce E. Gerstein

Bruce E. Gerstein

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CERTIFICATE OF SERVICE

I, Bruce E. Gerstein, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: January 22, 2015

/s/ Bruce E. Gerstein
Bruce E. Gerstein