

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE AKORN, INC. SECURITIES
LITIGATION

Case No. 15 C 01944
Honorable Gary Feinerman

**NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION, MOTION FOR
ATTORNEYS' FEES AND EXPENSES, AND FINAL APPROVAL HEARING**

**TO: ALL PERSONS OR ENTITIES WHO PURCHASED OR ACQUIRED SHARES
OF AKORN, INC.'S COMMON STOCK BETWEEN MAY 6, 2014 AND APRIL 24,
2015, BOTH DATES INCLUSIVE, AND WHO WERE DAMAGED THEREBY.**

Please read this Notice carefully. Your rights may be affected by legal proceedings in this litigation. If you are a member of the Class described herein, you may be entitled to receive a payment pursuant to the proposed Settlement described below.

CLASS RECOVERY: This Notice has been sent to you pursuant to an Order of the United States District Court for the Northern District of Illinois (the "Court") in the above-captioned action (the "Action").¹ One of the purposes of this Notice is to inform you of the proposed Settlement of the Action for \$24 million. Plaintiffs estimate there were approximately 24 million allegedly damaged shares of Akorn common stock traded during the Class Period. Pursuant to the Plan of Allocation, if all such shares were in fact damaged and the holders of all such shares elected to participate in the Settlement, the average recovery could be \$1.00 per share before deduction of any fees, expenses, costs, and awards described herein. The actual amount per share disbursed to Class Members who participate in the Settlement may be more or less than this figure.

POTENTIAL OUTCOME OF THE CASE: Class Counsel, on behalf of Class Plaintiffs, recognize the expense, risks, and uncertain outcome of any litigation and subsequent appeals, especially for a complex action such as this with its inherent difficulties and delays. Defendants have denied and continue to deny all allegations of wrongdoing or liability whatsoever arising out of any of the conduct, statements, acts, or omissions alleged, or that could have been alleged, in the Action.

REASONS FOR SETTLEMENT: Plaintiffs believe that the proposed Settlement is fair, reasonable, adequate, and in the best interests of the Class. Plaintiffs and Class Counsel have reached this conclusion after investigating and considering, among other things, the amount of the Settlement, the strengths and weaknesses of Plaintiffs' claims against Defendants, the uncertainties of trial and appeal, and the concrete benefits provided by the Settlement to Class Members. The Parties agreed to the Settlement after engaging in two mediation sessions before a former federal judge. Without admitting any wrongdoing or liability on their part whatsoever,

¹ All capitalized terms in this Notice that are not otherwise defined herein shall have the meanings ascribed to them in the Stipulation of Settlement dated November 17, 2017 (the "Stipulation"), which is available at www.akornsecuritieslitigation.com.

Defendants are nevertheless willing to settle provided that all of the claims of the Class are settled and compromised to avoid the continuing burden, expense, inconvenience, and distraction to Defendants of the Action.

ATTORNEYS' FEES AND COSTS SOUGHT: Class Counsel have not received any payment for their services in prosecuting the Action on behalf of Class Plaintiffs and Class Members, nor have they been reimbursed for their out-of-pocket expenditures. Class Counsel will apply to the Court for attorneys' fees not to exceed 33% of the Settlement Amount and reimbursement of expenses not to exceed \$450,000. If the amount requested by Class Counsel is approved by the Court, the average cost would be \$0.35 per share for each of the estimated 24 million potentially damaged shares. In addition, a compensatory award for the time and expenses incurred by Class Plaintiffs will be sought, not to exceed \$10,000 each.

IDENTIFICATION OF PLAINTIFFS' COUNSEL: Requests for further information regarding the Action and this Notice may be directed to Class Counsel: Joshua L. Crowell, Glancy Prongay & Murray LLP, 1925 Century Park East, Suite 2100, Los Angeles, California 90067, jcrowell@glancylaw.com; or Patrick V. Dahlstrom, Pomerantz LLP, 10 South La Salle Street, Suite 3505, Chicago, Illinois 60603, pdahlstrom@pomlaw.com.

IDENTIFICATION OF THE CLASS

The proposed Settlement affects the rights of the members of the Class. The Class consists of all persons or entities who purchased or acquired shares of Akorn's common stock between May 6, 2014 and April 24, 2015, both dates inclusive, and who were damaged thereby. Excluded from the Class are Defendants, the officers and directors of Akorn, at all relevant times, members of their immediate families and their legal representatives, heirs, successors or assigns and any entity in which Defendants have or had a controlling interest.

DESCRIPTION OF THE ACTION

Summary of the Action

The Action is a securities fraud class action lawsuit that was commenced on March 4, 2015. On August 24, 2015, pursuant to the lead plaintiff provisions of the Private Securities Litigation Reform Act of 1995 ("PSLRA"), the Court appointed the Akorn Investor Group, currently consisting of Mikolaj Sarzynski, J. M. Cunniff, Jr., and Elizabeth Cunniff ("Class Plaintiffs" or "Plaintiffs"), as lead plaintiff. The Court also appointed Class Plaintiffs' counsel, Pomerantz LLP and Glancy Prongay & Murray (together, "Class Counsel"), as co-lead counsel.

On July 5, 2016, Class Plaintiffs filed their amended consolidated class action complaint ("Amended Complaint") on behalf of the putative class against Defendants Akorn, Inc., Rajat Rai, and Timothy A. Dick (together, "Defendants"). The Amended Complaint asserted claims under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 related to alleged misrepresentations and omissions made to Akorn investors between May 6, 2014 and April 24, 2015. These alleged misrepresentations and omissions primarily concerned inaccuracies in Akorn's reported financial results and material weaknesses in Akorn's internal controls over financial reporting during this period.

On August 9, 2016, Defendants filed a motion to dismiss all claims against them in the Amended Complaint. After the Parties fully briefed the motion to dismiss, on March 6, 2017, the Court entered an order denying the motion.

On May 5, 2017, Class Plaintiffs filed a motion for class certification. After the motion was fully briefed, but prior to the Court ruling on the motion, the Parties reached a settlement in principle.

Class Plaintiffs and Defendants have engaged in extensive fact discovery, including Defendants' production of over 1.9 million pages of documents and substantial third-party document productions made in response to subpoenas. Class Plaintiffs and Defendants have also retained experts, exchanged expert reports, and conducted expert discovery in connection with Class Plaintiffs' class certification motion.

The Proposed Settlement and Class Counsel's Evaluation

Before Defendants' motion to dismiss was decided, the Parties agreed to pursue mediation before former federal judge Layn Phillips. On November 10, 2016, after exchanging mediation statements, the Parties participated in a full-day, in-person mediation session before Judge Phillips, which did not result in a settlement.

After nearly a year of continued litigation, the Parties participated in a second full-day mediation session with Judge Phillips, which took place on September 26, 2017 and resulted in the current settlement. On October 3, 2017, the Parties jointly informed the Court of the settlement in principle. On October 16, 2017, the Parties signed a term sheet reflecting their agreement in principle to settle this Action.

Class Counsel continues to believe that the claims against Defendants in this Action have merit and that the evidence developed in discovery would support their claims at trial. However, they recognize and acknowledge the expense and length of continued proceedings, trial, and appeals, and have taken into account the uncertain outcome and the risk of any litigation, especially complex actions such as here. They are also mindful of the defenses asserted by Defendants and that Defendants have denied and continue to deny all allegations of wrongdoing or liability.

In light of the foregoing, Class Counsel believe that the \$24 million Settlement set forth in the Stipulation provides an excellent recovery for the Class. Based on the evaluation and recommendation of Class Counsel, Class Plaintiffs have determined that the Settlement is in the best interests of the Class.

The Release

In consideration of the establishment of the Settlement Fund, Class Members who do not submit a valid exclusion from the Class will release, discharge, and dismiss with prejudice all of the Released Plaintiffs' Claims, including Unknown Claims, against each of the Released Defendant Parties, as those terms are defined in the Stipulation, without costs to any party except as provided herein, upon the Effective Date.

Class Plaintiffs and all Class Members, whether or not any such Person submits a Proof of Claim and Release Form or shares in the Net Settlement Fund, on behalf of themselves and each of their predecessors, successors, parents, subsidiaries, affiliates, custodians, agents, assigns, representatives, heirs, executors, trustees, and administrators, will be deemed by this Settlement

on the Effective Date to release and forever discharge the Released Defendant Parties from any and all of the Released Plaintiffs' Claims.

On the Effective Date, all Class Members, and anyone claiming through or on behalf of any of them, will be forever barred and enjoined from commencing, instituting, prosecuting, or continuing to prosecute any action or other proceedings that asserts any of the Released Plaintiffs' Claims against any of the Released Defendant Parties in any court of law or equity, arbitration tribunal, or administrative forum.

PROPOSED PLAN OF ALLOCATION

The \$24,000,000 Settlement Amount and any interest earned thereon shall be the Settlement Fund. The Settlement Fund less taxes, approved costs, fees and expenses (the "Net Settlement Fund") shall be distributed to members of the Class who submit valid Claim Forms ("Authorized Claimants").

The Settlement Administrator shall determine each Authorized Claimant's *pro rata* share of the Net Settlement Fund based upon each Authorized Claimant's "Recognized Loss." The Recognized Loss formula is not intended to be an estimate of the amount of what a Class Member lost or might have been able to recover after a trial; nor is it an estimate of the amount that will be paid to Authorized Claimants pursuant to the Settlement. The Recognized Loss formula is simply the basis upon which the Net Settlement Fund will be proportionately allocated to Authorized Claimants.

The Plan of Allocation takes into consideration the limitation on damages provision of the PSLRA, 15 U.S.C. § 78u-4(e), the advice of Plaintiffs' experts, and the principles of economic loss articulated by the Supreme Court in *Dura Pharmaceuticals, Inc. v. Broudo*, 544 U.S. 336 (2005). For purposes of this Settlement, the Recognized Loss shall be calculated as follows:

1. There is no recognized loss for shares purchased prior to May 6, 2014.
2. For shares purchased between May 6, 2014 and March 2, 2015, both dates inclusive,
 - (a) that were subsequently sold on or before March 2, 2015, the recognized loss per share is \$0.00.
 - (b) that were subsequently sold between March 3, 2015 and April 24, 2015, both dates inclusive, the recognized loss per share is the lesser of
 - i. \$4.18; or
 - ii. the purchase price minus the sale price (excluding all fees, taxes and commissions). If this calculation results in a negative number, then the recognized loss per share is \$0.
 - (c) that were subsequently sold between April 25, 2015 and July 23, 2015, both dates inclusive, the recognized loss per share is the lesser of
 - i. \$15.04; or
 - ii. the purchase price minus the sale price (excluding all fees, taxes and commissions). If this calculation results in a negative number, then the recognized loss per share is \$0; or

- iii. the purchase price minus the “90-Day Lookback Value” on the date of sale/disposition provided in Table 1 below. If this calculation results in a negative number, then the recognized loss per share is \$0.
 - (d) that were still held as of the close of trading on July 23, 2015, the recognized loss per share is the lesser of
 - i. \$15.04; or
 - ii. the purchase price (excluding all fees, taxes and commissions) minus the average closing price of the shares during the 90-day period following the Class Period, which is \$44.13. If this calculation results in a negative number, then the recognized loss per share is \$0.
3. For shares purchased between March 3, 2015 and April 24, 2015, both dates inclusive,
- (a) that were subsequently sold on or before April 24, 2015, the recognized loss per share is \$0.
 - (b) that were subsequently sold between April 25, 2015 and July 23, 2015, both dates inclusive, the recognized loss per share is the lesser of
 - i. \$10.86; or
 - ii. the purchase price minus the sale price (excluding all fees, taxes and commissions). If this calculation results in a negative number, then the recognized loss per share is \$0; or
 - iii. the purchase price minus the “90-Day Lookback Value” on the date of sale/disposition provided in Table 1 below. If this calculation results in a negative number, then the recognized loss per share is \$0.
 - (c) that were still held as of the close of trading on July 23, 2015, the recognized loss per share is the lesser of
 - i. \$10.86; or
 - ii. the purchase price (excluding all fees, taxes and commissions) minus the average closing price of the shares during the 90-day period following the Class Period, which is \$44.13. If this calculation results in a negative number, then the recognized loss per share is \$0.
4. There is no recognized loss for shares purchased on or after April 25, 2015.

Table 1					
Sale / Disposition Date	90-Day Lookback Value	Sale / Disposition Date	90-Day Lookback Value	Sale / Disposition Date	90-Day Lookback Value
4/27/2015	\$43.10	5/27/2015	\$42.21	6/25/2015	\$44.24
4/28/2015	\$43.93	5/28/2015	\$42.34	6/26/2015	\$44.22
4/29/2015	\$43.79	5/29/2015	\$42.48	6/29/2015	\$44.19
4/30/2015	\$43.25	6/1/2015	\$42.64	6/30/2015	\$44.18
5/1/2015	\$43.20	6/2/2015	\$42.79	7/1/2015	\$44.16

5/4/2015	\$43.04	6/3/2015	\$42.91	7/2/2015	\$44.14
5/5/2015	\$42.60	6/4/2015	\$42.99	7/6/2015	\$44.13
5/6/2015	\$42.19	6/5/2015	\$43.11	7/7/2015	\$44.10
5/7/2015	\$41.98	6/8/2015	\$43.21	7/8/2015	\$44.04
5/8/2015	\$41.85	6/9/2015	\$43.31	7/9/2015	\$44.01
5/11/2015	\$41.75	6/10/2015	\$43.41	7/10/2015	\$43.99
5/12/2015	\$41.64	6/11/2015	\$43.51	7/13/2015	\$43.98
5/13/2015	\$41.63	6/12/2015	\$43.59	7/14/2015	\$44.00
5/14/2015	\$41.62	6/15/2015	\$43.66	7/15/2015	\$44.00
5/15/2015	\$41.61	6/16/2015	\$43.75	7/16/2015	\$44.02
5/18/2015	\$41.67	6/17/2015	\$43.83	7/17/2015	\$44.05
5/19/2015	\$41.79	6/18/2015	\$43.95	7/20/2015	\$44.06
5/20/2015	\$41.91	6/19/2015	\$44.04	7/21/2015	\$44.07
5/21/2015	\$41.99	6/22/2015	\$44.14	7/22/2015	\$44.10
5/22/2015	\$42.09	6/23/2015	\$44.19	7/23/2015	\$44.13
5/26/2015	\$42.12	6/24/2015	\$44.23		

General Provisions:

1. There shall be no Recognized Loss attributed to any Akorn securities other than Akorn common stock.
2. The date of a purchase or sale of Akorn common stock is the “trade” date, and not the “settlement” date.
3. The first-in, first-out basis (“FIFO”) will be applied to both purchases and sales.
4. The date of covering a “short sale” is deemed to be the date of purchase of Akorn common stock; and the date of a “short sale” is deemed to be the date of sale of Akorn common stock. Shares originally sold short will have a Recognized Loss of zero.
5. Exercise of option contracts into Akorn common stock will be considered to be purchases or sales of Akorn common stock as of the date of the exercise.
6. No cash payment will be made on a claim where the potential distribution amount is less than \$20. Please be advised that if you did not incur a Recognized Loss as defined in the Plan of Allocation you will not receive a cash distribution from the Net Settlement Fund, but you will be bound by all determinations and judgments of the Court in connection with the Settlement, including being barred from asserting any of the Released Claims against the Released Parties.
7. The Court has reserved jurisdiction to allow, disallow or adjust the claim of any Class Member on equitable grounds.
8. No Person shall have any claim against Class Counsel, the Settlement Administrator or other agent designated by Class Counsel, or any Defendant or any Defendants’ Counsel based on the distribution made substantially in accordance with the Stipulation and this Plan of Allocation, or further orders of the Court.
9. Class Members who do not submit valid Claim Forms will not share in the settlement proceeds. Class Members who do not either submit a request for exclusion or submit a valid Claim Form will nevertheless be bound by the settlement and the Order and Final Judgment of the Court dismissing this Action.

REQUESTING EXCLUSION FROM THE CLASS

IF YOU ARE A MEMBER OF THE CLASS, YOU MAY BE ELIGIBLE TO SHARE IN THE BENEFITS OF THIS SETTLEMENT AND WILL BE BOUND BY ITS TERMS UNLESS YOU EXCLUDE YOURSELF FROM THE CLASS.

Each Class Member shall be bound by all determinations and judgments of the Court in connection with the Settlement, whether favorable or unfavorable, unless such Class Member shall mail, by first class mail, sufficient postage prepaid, a written request for exclusion from the Class, **postmarked no later than March 12, 2018**, addressed to the Settlement Administrator at: *In re Akorn, Inc. Securities Litigation, Exclusions* c/o JND Legal Administration, P.O. Box 6847, Broomfield, Colorado 80021. Such request for exclusion shall be in a form that sufficiently identifies: (1) the name and address of the person(s) or entity seeking exclusion; and (2) a list of all transaction(s) involving Akorn Common Stock during the period May 6, 2014 and April 24, 2015, inclusive, including the number of shares, principal amount and trade date of each purchase and sale. A request for exclusion shall not be effective unless submitted within the time and in the form and manner provided for herein. **You cannot exclude yourself by telephone, email or facsimile.**

If a Person who is a Class Member duly requests to be excluded from the Class, such Person will not be bound by any orders or judgments entered by the Court with respect to the Settlement and shall not be entitled to receive any benefits provided by the Settlement in the event it is finally approved by the Court.

If a judgment approving the Settlement provided for in the Stipulation is entered by the Court, all Class Members who have not validly requested exclusion shall conclusively be deemed to have released and shall thereafter be barred from asserting any of the Released Claims against any of the Released Parties.

STATEMENT OF ATTORNEYS' FEES AND COSTS SOUGHT

Class Counsel intend to apply to the Court for an award of attorneys' fees and reimbursement of expenses from the Settlement Fund. Class Counsel will seek no more than 33 percent of the Settlement Fund as attorneys' fees, plus an additional amount not to exceed \$450,000 as reimbursement for the expenses and costs actually incurred in prosecuting the Action. Class Counsel believes their intended fee request to be fair and reasonable. Class Counsel has litigated this case on a wholly contingent basis and have received no compensation during the period the case has been pending. Class Counsel expended considerable time and expense during the Action. Had the case not been successful, Class Counsel would have sustained a considerable financial loss.

In addition, Class Counsel intend to apply to the Court on behalf of the three Court-appointed Class Plaintiffs for reimbursement from the Settlement Fund of their reasonable time, costs, and expenses directly relating to their representation of the Class. Class Counsel will seek no more than \$10,000 for each Class Plaintiff.

THE FINAL APPROVAL HEARING

The Final Settlement Approval Hearing shall be held before Honorable Gary Feinerman on April 2, 2018, at 10:00 a.m., in Courtroom 2125 of the United States District Court for the Northern District of Illinois, Everett McKinley Dirksen Building, United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604, to determine: (1) whether a Class should be certified for purposes of the Settlement only and whether Class Plaintiffs and Class Counsel have adequately represented Class Members; (2) whether the proposed Settlement, as set forth in the Stipulation of Settlement filed with the Court, should be approved as fair, reasonable, and adequate; (3) whether the proposed Plan of Allocation is fair, just, reasonable, and adequate; (4) whether the Action should be dismissed on the merits and with prejudice as to Defendants; (5) whether the Court should permanently enjoin the assertion of any of the Released Claims against any of the Released Parties; (6) whether the application by Class Counsel for an award of attorneys' fees and expenses should be approved; and (7) whether the Class Plaintiffs' application for reimbursement of costs and expenses should be approved.

The Final Settlement Approval Hearing may be adjourned or continued from time to time by the Court without further notice to the Class other than public notice via the Court's docket.

Any Class Member who does not timely and validly request exclusion from the Class and who objects to the Settlement, the adequacy of the representation provided by Class Plaintiffs and Class Counsel, the proposed Plan of Allocation of the Net Settlement Fund, the Final Judgment contemplated by the Stipulation, the application for attorneys' fees and reimbursement of expenses, and/or the application for the reimbursement of the reasonable costs and expenses of the Class Plaintiffs, or who otherwise wishes to be heard with respect to any of the foregoing, may appear in person or by attorney at the Final Settlement Approval Hearing, at his or her own expense, and present any evidence or argument that may be proper and relevant. However, no person shall be heard, and no papers, briefs, pleadings or other documents submitted by any such Person shall be considered by the Court unless such Person submits, no later than March 12, 2018, the following: (1) a notice of the person's intention to appear; (2) a statement of such person's objections to any matter before the Court; (3) the grounds for such objections or the reason for such Person's request to appear and to be heard; (4) a list of all transaction(s) involving Akorn common stock during the period May 6, 2014 and April 24, 2015, inclusive, including the number of shares, principal amount, and trade date of each purchase and sale; and (5) brokerage statements and/or confirmation slips sufficient to establish that such Person is a Class Member. These materials and information shall be filed by such Person with the Office of the Clerk of the United States District Court for the Northern District of Illinois, Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604.

Any Person who fails to object in the manner prescribed in the paragraph immediately above shall be deemed to have waived any objections that Person may have and shall be barred from raising such objections in this or any other action or proceeding. Objections directed solely to the proposed Plan of Allocation, attorneys' fees and expenses, or awards to the Class Plaintiffs will not affect the finality of either the Settlement or the Judgment, if the Settlement is approved by the Court.

All Class Members who do not request exclusion from the Settlement, in the manner provided herein, will be represented by Class Counsel in connection with the Settlement, but may, if they so desire, also enter an appearance through counsel of their own choice and at their own expense.

PROOF OF CLAIM AND RELEASE FORM

To be eligible to receive a cash distribution from the Settlement Fund, you must timely complete, sign, and file a Proof of Claim and Release Form (“Claim Form”). A Claim Form is annexed to this Notice. You may receive more than one copy of this Notice and the Claim Form, but you should **submit only one Claim Form** for each differently named account or ownership, such as an individual account, an IRA account, a joint account, a custodial account, etc.

The Claim Form (1) **must** be completed in accordance with the instructions on the Claim Form, (2) **must** enclose all documentation required by the instructions, and (3) **must** be filed with the Court-appointed Settlement Administrator **postmarked on or before April 20, 2018** at the following address:

In re Akorn, Inc. Securities Litigation
c/o JND Legal Administration
PO Box 6847
Broomfield, Colorado 80021

A Claim Form will be deemed filed when mailed via first-class mail, sufficient postage prepaid.

Class Members who do not exclude themselves from the Class and who fail to submit a valid and timely Claim Form will nevertheless be bound by the Settlement if finally approved, and all orders and judgments entered by the Court in connection therewith.

By Order of the Court, the Claim Form provides for and requires a release of all Released Claims as described above, by all Class Members who file Claim Forms. The release will become effective on the Effective Date of the Settlement.

Each Person submitting a Claim Form thereby submits to the jurisdiction of the Court for purposes of the Action, the Settlement and any proceedings relating to such Claim Form, and agrees that such a filed Claim Form will be subject to review and further inquiry as to such Person’s status as a member of the Class and the allowable amount of the claim. **You will bear all risks of delay or non-delivery of your claim.**

SPECIAL NOTICE TO SECURITIES BROKERS AND OTHER NOMINEES

If you purchased or acquired shares of Akorn common stock between May 6, 2014 and April 24, 2015, inclusive, for the beneficial interest of a Person other than yourself, you must either: (a) within seven (7) days after receipt of this Notice, provide to the Settlement Administrator the name and last known address of each Person (preferably in electronic format (e.g., Excel, csv)) setting forth: (i) title/registration, (ii) street address, (iii) city/state/zip, and (iv) email address; or (b) request, in writing, additional copies of this Notice at the below address, which will be provided free of charge, and within seven (7) days after receipt of such Notices, mail the Notice directly to the beneficial owners of the securities referred to herein.

If you choose to follow alternative procedure (b), the Court has directed that, upon such mailing, you send a statement to the Settlement Administrator confirming that the mailing was made as directed. You are entitled to reimbursement of your *reasonable* expenses actually incurred in connection with the foregoing, including reimbursement of postage expense and the actual out of pocket cost incurred in connection with ascertaining the names and addresses of beneficial owners. Those expenses will be paid upon request and submission of appropriate

supporting documentation. All communications concerning the foregoing should be addressed to the Settlement Administrator at the following address:

In re Akorn, Inc. Securities Litigation
c/o JND Legal Administration
PO Box 6847
Broomfield, Colorado 80021
Telephone: 1-(833) 807-3689
Website: www.akornsecuritieslitigation.com

EXAMINATION OF PAPERS AND INQUIRIES

For further information about the Action, you may contact Class Counsel at the addresses listed above or consult the pleadings and other papers filed in the Action at the Office of the Clerk of the United States District Court for the Northern District of Illinois, Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604, during normal business hours of each business day. If you have an account with PACER, you may consult the pleadings and other papers via Electronic Case Filing at the website of the Northern District of Illinois: <https://ecf.ilnd.uscourts.gov/>. Certain pleadings and papers will also be made available at www.akornsecuritieslitigation.com.

If you have any questions concerning this case or your membership in the Class, please contact the Settlement Administrator:

In re Akorn, Inc. Securities Litigation
c/o JND Legal Administration
PO Box 6847
Broomfield, Colorado 80021
Telephone: 1-(833) 807-3689
Website: www.akornsecuritieslitigation.com

INQUIRIES SHOULD NOT BE DIRECTED TO THE COURT, THE CLERK'S OFFICE, THE DEFENDANTS, OR DEFENDANTS' COUNSEL.

Dated: December 1, 2017

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

**By Order of the Court for the United States
District Court for the Northern District of Illinois**