



GRANTED

EFiled: Mar 18 2014 12:10PM EDT
Transaction ID 55163743
Case No. Multi Case



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

BOOTH FAMILY TRUST, On Behalf of)
Itself and All Others Similarly Situated,)

Plaintiff,)

v.)

C.A. No. 9396-VCP

FOREST LABORATORIES, INC.,)
HOWARD SOLOMON, BRENTON L.)
SAUNDERS, NESLI BASGOZ,)
CHRISTOPHER J. COUGHLIN, KENNETH)
E. GOODMAN, VINCENT J. INTRIERI,)
PIERRE LEGAULT, GERALD M.)
LIEBERMAN, LAWRENCE S. OLANOFF,)
LESTER B. SALANS, PETER J.)
ZIMETBAUM, ACTAVIS PLC, TANGO US)
HOLDINGS INC., TANGO MERGER SUB 1)
LLC, and TANGO MERGER SUB 2 LLC,)

Defendants.)

IAN ALAN HOLDER, Individually and On)
Behalf of All Others Similarly Situated,)

Plaintiff,)

v.)

C.A. No. 9400-VCP

FOREST LABORATORIES, INC.,)
HOWARD SOLOMON, BRENTON L.)
SAUNDERS, NESLI BASGOZ,)
CHRISTOPHER J. COUGHLIN, KENNETH)
E. GOODMAN, VINCENT J. INTRIERI,)
PIERRE LEGAULT, GERALD M.)
LIEBERMAN, LAWRENCE S. OLANOFF,)
LESTER B. SALANS, PETER J.)
ZIMETBAUM, ACTAVIS PLC, TANGO US)
HOLDINGS INC., TANGO MERGER SUB 1)
LLC, and TANGO MERGER SUB 2 LLC,)

Defendants.)

SAMUEL DAVID SCHER, individually)
and on behalf of all others similarly)
situated,)

Plaintiff,)

v.)

C.A. No. 9401-VCP)

FOREST LABORATORIES, INC.,)
HOWARD SOLOMON, BRENTON L.)
SAUNDERS, NESLI BASGOZ,)
CHRISTOPHER J. COUGHLIN, KENNETH)
E. GOODMAN, VINCENT J. INTRIERI,)
PIERRE LEGAULT, GERALD M.)
LIEBERMAN, LAWRENCE S. OLANOFF,)
LESTER B. SALANS, PETER J.)
ZIMETBAUM, ACTAVIS PLC, TANGO US)
HOLDINGS INC., TANGO MERGER SUB 1)
LLC, and TANGO MERGER SUB 2 LLC)

Defendants.)

SANDRA MISSAKIAN, Individually and on)
behalf of all others similarly situated,)

Plaintiff,)

v.)

C.A. No. 9407-VCP)

FOREST LABORATORIES, INC.,)
HOWARD SOLOMON, BRENTON L.)
SAUNDERS, NESLI BASGOZ,)
CHRISTOPHER J. COUGHLIN, KENNETH)
E. GOODMAN, VINCENT J. INTRIERI,)
PIERRE LEGAULT, GERALD M.)
LIEBERMAN, LAWRENCE S. OLANOFF,)
LESTER B. SALANS, PETER J.)
ZIMETBAUM, ACTAVIS PLC, TANGO US)
HOLDINGS INC., TANGO MERGER SUB 1)
LLC, and TANGO MERGER SUB 2 LLC,)

Defendants.)

**[PROPOSED] ORDER OF CONSOLIDATION AND
APPOINTMENT OF PLAINTIFFS' CO-LEAD COUNSEL**

It appearing that the above-captioned actions involve the same subject matter, and that the administration of justice would be best served by consolidating the actions,

IT IS HEREBY ORDERED this _____ day of _____, 2014:

1. The above-captioned actions shall be consolidated for all purposes and are referred to herein as the "Consolidated Action."

2. Hereafter, papers need only be filed in Civil Action No. 9396-VCP.

3. The consolidated case caption shall be:

IN RE FOREST LABORATORIES, INC.) CONSOLIDATED
STOCKHOLDERS LITIGATION) C.A. No. 9396-VCP

4. The law firms of RIGRODSKY & LONG, P.A., 2 Righter Parkway, Suite 120, Wilmington, Delaware 19803 and WEISLAW LLP, 1500 Broadway, 16th Floor, New York, New York 10036 are hereby appointed as Co-Lead Counsel for Plaintiffs. The law firms of LEVI & KORSINSKY, LLP, 733 Summer Street, Suite 304, Stamford, Connecticut 06901 and BROWER PIVEN, A Professional Corporation, 475 Park Avenue South, 33rd Floor, New York, New York 10016 are hereby appointed as members of the Executive Committee for Plaintiffs and will be substantively involved in the prosecution of the Consolidated Action. The law firms of RIGRODSKY & LONG, P.A., 2 Righter Parkway, Suite 120, Wilmington, Delaware 19803 and O'KELLY ERNST & BIELLI, LLC, 901 N. Market Street, Suite 1000, Wilmington, Delaware 19801 shall serve as Plaintiffs' Co-Liaison Counsel.

5. All documents previously filed to date in any of the cases consolidated herein are deemed a part of the record in the Consolidated Action. Until a consolidated amended complaint is filed, the Verified Class Action Complaint filed in Civil Action No. 9400-VCP on February

28, 2014, is hereby deemed the operative complaint in the Consolidated Action and shall supersede all previous complaints filed in any of the above-captioned actions or any other action subsequently consolidated therewith. Defendants need not respond to the complaints filed in the constituent actions.

6. Co-Lead Counsel for Plaintiffs, in consultation with Plaintiffs' Co-Liaison Counsel, shall set policy for plaintiffs for the prosecution of this litigation, ensure that there is no duplication of effort or unnecessary expense, coordinate on behalf of plaintiffs the initiation and conduct of discovery proceedings, provide direction, supervision, and coordination of all activities of plaintiffs' counsel, and have the authority to negotiate a settlement, subject to approval of plaintiffs and the Court. Any agreement reached between counsel for defendants and Co-Lead Counsel for Plaintiffs shall be binding on the other Co-Lead Counsel and plaintiffs.

7. Co-Lead Counsel for Plaintiffs, in consultation with Plaintiffs' Co-Liaison Counsel, shall assume the following powers and responsibilities:

- a. coordinate and direct the preparation of pleadings;
- b. coordinate and direct the briefing and argument of motions;
- c. coordinate and direct the conduct of discovery and other pretrial proceedings;
- d. coordinate and direct class certification proceedings;
- e. coordinate the selection of counsel to act as the plaintiffs' spokesperson at pretrial conferences;
- f. call meetings of plaintiffs' counsel as they deem necessary and appropriate from time to time;

g. conduct any and all settlement negotiations with counsel for the defendants;

h. coordinate and direct the preparation for trial and trial of this matter, and delegate work responsibilities to selected counsel as may be required; and

i. coordinate and direct any other matters concerning the prosecution or resolution of the Consolidated Action.

8. Plaintiffs' Co-Liaison Counsel shall be responsible for coordinating all activities and appearances on behalf of plaintiffs and for the dissemination of notices and orders of this Court, as well as for communications to and from this Court. No motion, request for discovery, or other pretrial or trial proceedings shall be initiated or filed by any plaintiffs except through Plaintiffs' Co-Liaison Counsel.

9. This Order shall apply to this Consolidated Action and any future-filed actions relating to the subject matter of this case. When a case that properly belongs as part of the Consolidated Action is hereafter filed in the Court, this Court requests the assistance of counsel in calling to the attention of the Court the filing of any case which might properly be consolidated as part of the Consolidated Action, and counsel are to assist in assuring that counsel in subsequent actions receive notice of this Order.

Vice Chancellor

This document constitutes a ruling of the court and should be treated as such.

Court: DE Court of Chancery Civil Action

Judge: Multi-Case

File & Serve

Transaction ID: 55162064

Current Date: Mar 18, 2014

Case Number: Multi-Case

Case Name: Multi-Case

Court Authorizer: Parsons, Donald F

/s/ Judge Parsons, Donald F