

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

_____))
IN RE SALIX PHARMACEUTICALS, LTD.) Case No. 14 Civ. 8925 (KMW)
_____)) CLASS ACTION
_____))
_____)

**NOTICE OF LEAD PLAINTIFF’S MOTION FOR
FINAL APPROVAL OF SETTLEMENT AND PLAN OF ALLOCATION**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and this Court’s Order Preliminarily Approving Proposed Settlement and Providing for Notice filed April 5, 2017, and upon (a) the Declaration of Salvatore J. Graziano in Support of (I) Lead Plaintiff’s Motion for Final Approval of Settlement and Plan of Allocation, and (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses; (b) the Memorandum of Law in Support of Lead Plaintiff’s Motion for Final Approval of Settlement and Plan of Allocation; and (c) all other papers and proceedings herein, Lead Plaintiff, PWCM Master Fund Ltd., Pentwater Equity Opportunities Master Fund Ltd., Oceana Master Fund Ltd., Pentwater Merger Arbitrage Master Fund Ltd., and LMA SPC for and on behalf of the MAP98 Segregated Portfolio (collectively, “Lead Plaintiff” or the “Pentwater Funds”), on behalf of itself and the Settlement Class, will and does hereby move this Court, before the Honorable Kimba M. Wood, on July 24, 2017 at 11:00 a.m. in Courtroom 18B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, or at such other location and time as set by the Court, for entry of a Judgment approving the Settlement as fair, reasonable and adequate and for entry of an Order approving the proposed Plan of Allocation as fair, reasonable and adequate. A proposed Judgment and Order granting the requested relief will be submitted

with Lead Plaintiff's reply papers after the deadlines for objecting to the Settlement and requesting exclusion from the Settlement Class have passed.

Dated: June 19, 2017

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

/s/ Salvatore J. Graziano _____

Salvatore J. Graziano

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