

EXHIBIT Q

COVINGTON & BURLING LLP

1201 PENNSYLVANIA AVENUE NW
WASHINGTON, DC 20004-2401
TEL 202.662.6000
FAX 202.662.6291
WWW.COV.COM

BEIJING
BRUSSELS
LONDON
NEW YORK
SAN DIEGO
SAN FRANCISCO
SILICON VALLEY
WASHINGTON

ANDREW D. LAZEROW
TEL 202.662.5081
FAX 202.778.5081
ALAZEROW@COV.COM

April 15, 2013

VIA FACSIMILE (267-299-5071)

The Honorable Mary A. McLaughlin
U.S. District Court for the Eastern District of Pennsylvania
2609 Market Street
Philadelphia, PA 19106-1797

Re: *In re Wellbutrin XL Antitrust Litigation*, No. 08-cv-2433

Dear Judge McLaughlin:

I write to inform the Court of a procedural error by Valeant's counsel in connection with Valeant's settlement with the indirect purchaser plaintiffs in the above-referenced matter. On February 15, 2013, the indirect purchaser plaintiffs submitted the proposed settlement to the Court as part of their motion for preliminary approval of the settlement (Dkt Nos. 452-454). On February 22, 2013, the Court granted preliminary approval of the proposed settlement, approved the proposed form of class notice, and set a hearing on final approval for June 18, 2013 (Dkt. No. 456).

The Class Action Fairness Act ("CAFA") required Valeant to issue a notice of the proposed settlement to appropriate federal and state officials within ten days of plaintiffs' filing of the proposed settlement. 28 U.S.C. § 1715(b). We did not issue the notice within ten days, and instead, first realizing the mistake late last week, sent the notice on Friday April 12. CAFA provides that "[a]n order giving final approval of a proposed settlement may not be issued earlier than 90 days after" the appropriate federal and state officials are notified. § 1715(d). If notice is not sufficiently provided, then a "class member may refuse to comply with and may choose not to be bound by" the settlement. § 1715(e)(1).

The Court-approved notice has been issued, informing class members that: (i) they have until May 31, 2013 to submit a claim, opt out, or object to the proposed settlement; and (ii) the Court will hold a hearing on final approval on June 18, 2013.

Valeant counsel has conferred with plaintiffs' counsel. Valeant and the indirect purchaser plaintiffs jointly request that: (i) the hearing go forward as scheduled on June 18, as the class has already been notified of the hearing set for that date; but (ii) the Court hold in abeyance its decision on final approval until July 15, 2013, when more than 90 days will have elapsed since Valeant mailed the CAFA notices. *See, e.g., In re Processed Egg Prods.*

The Honorable Mary A. McLaughlin

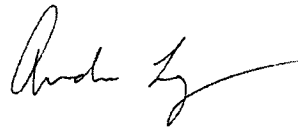
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Antitrust Litig., 284 F.R.D. 249, 258 n.12 (E.D. Pa. 2012) (finding CAFA requirements substantially satisfied, despite untimely issuance of CAFA notices, and holding decision on final approval in abeyance until expiration of 90-day period in § 1715(d)) (Pratter, J.). The proposed procedure would serve the Court's interest in assuring the finality of settlements. If the settlement receives final approval prior to expiration of the 90-day period, there is a risk of challenges to the settlement and further unnecessary litigation. Nothing in the proposed procedure adversely affects the rights of co-defendant GSK, which has not settled.

Valeant apologizes for any inconvenience to the Court and the indirect purchaser plaintiffs from the mistake. We are available at the Court's convenience.

Sincerely,



Andrew D. Lazerow
Counsel for Valeant Defendants

cc: Kenneth A. Wexler, Esq. (Counsel for Indirect Purchaser Plaintiffs) (*via e-mail*)
Stephen J. Kastenber, Esq. (Counsel for GSK defendants) (*via e-mail*)