



IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

THE STATE OF ALABAMA,

Plaintiff,

-vs-

**ENDO HEALTH SOLUTIONS, INC.,
et al.,**

Defendants.

CASE NO. CV-2019-901174.0

SUBMISSION OF SPECIAL MASTER REPORT

COMES NOW the Local Government Executive Committee and submits the
Allergan- Alabama Political Subdivisions and Government Public Health Entities Special
Master Report attached hereto.

/s/ Christina D. Crow

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**Allergan-Alabama
Political Subdivision & Governmental Public Health Entity
Special Master Report**

I. Total Gross Amount to the State of Alabama, Political Subdivisions, and Governmental Public Health Entities

In 2023, Allergan Finance, LLC and Allergan Limited (“Allergan”) and its respective past and present direct or indirect parents, subsidiaries, divisions, affiliates, joint ventures, predecessors, successors, and assigns entered into a global settlement with various states and political subdivisions. Allergan agreed to pay up to \$2.02 billion over 7 years. The State of Alabama (“the State”) and all relevant Alabama Political Subdivisions and Governmental Public Health Entities (collectively, “Local Governments”) are participating in the Allergan Public Global Settlement Agreement. According to reports provided to the Special Master by the national Directing Administrator, the State of Alabama can reasonably expect to receive a gross total of \$34,413,700.14 to be paid to the State and Local Governments over the seven Payment Years.¹

The State and Local Governments entered into an intergovernmental agreement, the *Allergan, Allergan, CVS, & Walgreens Allocation Agreement*, to allocate settlement proceeds between themselves. Pursuant to §B.1 of the *Allergan, Allergan, CVS, & Walgreens Allocation Agreement*, “The State, Political Subdivisions, and Governmental Public Health Entities shall divide settlement funds recovered by the State with 40% going to the Political Subdivisions, 10% going to the Government Public Health Entities, and 50% going to the State.”

Accordingly, the allocation of the Allergan gross settlement to the State and Local Governments is as follows:

¹ For all purposes relevant to this Special Master Report, Payment Year 1 and Payment Year 2 will both be issued in 2024.

Allergan Settlement Summary	Percentage	Gross Amounts
State of Alabama	50%	\$17,206,850.07
Gross to Political Subdivisions	40%	\$13,765,480.06
Gross to Special Districts	10%	\$3,441,370.01
Total Amount	100%	\$34,413,700.14

II. Administrative Costs

Pursuant to the *Order Establishing Qualified Settlement Fund and Appointing Receiver for the Fund* (see Doc. 2834) and the *Order Appointing Special Master* (see Doc. 2818), the administrative costs attributable to the Alabama Local Government portion are \$60,000. Pursuant to §2 of the Appointing Order, \$30,000 shall be paid to Special Master Joseph Tann. Pursuant to ¶8 of the QSF Order, \$30,000 shall be paid to Richard Weinberg of Winbridge Partners for his services as the court-appointed Receiver.

III. Political Subdivision & Governmental Public Health Entity Attorneys' Fees

A. Attorneys' Fees – Committee Fee Fund

To compensate the court-appointed leadership Committees for common benefit work (see Doc. 2675), the Court ordered that, “the Committee Fee Fund shall be funded in the future in additional amounts equaling two percent (2%) of any future gross recoveries from any opioid supply chain participants, whether manufacturer, distributor, or retailer, that are allocated in whole or in part to Alabama local governments, boards of health, and public health authorities ***that have filed cases in the MDL.***” On January 21, 2023, the Court increased the percentage from 2% to 3.5% for all settlements with an effective date on or after September 20, 2022. (see Doc. 2971)

The total Committee Fee Fund award for the Allergan Settlement is \$553,605.34. Pursuant to the original Committee Fee Fund Court Order, the full Committee Fee Fund award will be

distributed “as soon as those funds are available.” (i.e., Payment Year 1) The court-appointed Committee Fee Fund members voluntarily agreed to the division and allocation of the Committee Fee Fund compensation, and the Special Master accepted their agreement.

B. Attorneys’ Fees – National Contingency Fee Fund & Alabama Backstop

Nearly all law firms representing Alabama Local Governments were eligible to participate in the Allergan National Contingency Fee Fund established by Exhibit R of the *Allergan Global Opioid Settlement Agreement*. The law firms representing Alabama Local Governments expect to collectively receive approximately \$1.7 million over four Payment Years from the Allergan National Contingency Fee Fund. Additionally, the Special Master concludes that allocating \$2,420,265.69 from the Alabama Local Government Share to the Alabama Backstop/Deficiency Fund appropriately compensates counsel representing Alabama Local Governments. This amount, less \$30,000 to be paid to the Special Master in accordance with *Order Appointing Special Master* (see Doc. 2818), will be used to pay attorneys’ fees to the law firms representing Local Governments. These fees will be paid in equal installments over four Payment Years.

After the expiration of the objection period described in Section IV of this Special Master Report, the Special Master will separately notify the attorneys representing Alabama Local Governments of their attorney fee awards for each client.

IV. Payments to Alabama Political Subdivisions & Governmental Public Health Entities

A. Payments to Political Subdivisions

Net of all applicable administrative fees and expenses, and after accounting for the attorneys’ fees, \$14,142,979.04 is available to pay Political Subdivisions & Governmental Public Health Entities. The methodology for awarding the funds to Political Subdivisions is substantially

similar to the methodology used in MDL 2804. At the county-level, the model incorporates the following factors:

1. The number of persons suffering from opioid use disorder in the county;
2. The number of overdose deaths that occurred in the county; and
3. The amount of opioids distributed within the county by Morphine Milligram Equivalent.

For Cities/Towns, the formula draws on US Census Bureau data on local government spending by function. The functions or expenditure categories examined for each jurisdiction were: elementary and secondary education net of capital outlay, public welfare (including child protective services), hospitals net of capital outlay, health, police protection, fire protection, corrections net of capital outlay, housing and community development, and judicial and legal.

B. Payment to Governmental Public Health Entities

The allocation percentages for payments to Governmental Public Health Entities were determined by an arbitration proceeding conducted by the Honorable Sally Shushan, a retired federal magistrate judge on the United States District Court for the Eastern District of Louisiana. For the Allergan allocation, the Special Master sees no reason to deviate from the previously arbitrated allocations. For newly added Governmental Public Health Entities, the Special Master used an allocation methodology based on the number of beds for each hospital/healthcare authority.

All Alabama Political Subdivisions & Governmental Public Health Entities eligible to participate in the Allergan Settlement were assigned an allocation amount using the allocation model referenced above.

The \$14,142,979.04 to Alabama Local Governments will be paid over seven Payment Years.² The net amount to each Political Subdivision and Governmental Public Health Entity is hereby allocated as outlined in the attached Exhibit A. Detailed payment schedules for each Alabama Subdivision and Governmental Public Health Entity will soon be available in the Rubris Crosslink System. If a Political Subdivision or Governmental Public Health Entity wishes to object to its payment amount, it must do so **no later than 5:00 pm CDT on October 28, 2024, at which time all Political Subdivision amounts will become final.**

Allergan - Local Government Allocation Summary		
Committee Fee Fund	\$553,605.34	3.22%
Administrative Expenses	\$90,000.00	0.52%
Alabama Backstop/Deficiency Fee Fund	\$2,420,265.69	14.07%
Net to Alabama Local Governments	\$14,142,979.04	82.19%
	\$17,206,850.07	100.00%

Description	Payment Year 1	Payment Year 2 -4	Payment Year 5 - 7
Committee Fee Fund	\$553,605.34	\$0.00	\$0.00
Administrative Expenses	\$90,000.00	\$0.00	\$0.00
Alabama Backstop/Deficiency Fee Fund	\$605,066.42	\$605,066.42	\$0.00
Net to Alabama Local Governments	\$1,212,559.45	\$1,878,664.36	\$2,431,475.50
	\$2,461,231.22	\$2,483,730.78	\$2,431,475.50

IT IS SO ORDERED.

SPECIAL MASTER

Joseph C. Tann, ESQ

Dated: October 18, 2024

² This amount assumes no reductions to the total amount distributed to the State of Alabama and Local Governments from the Directing Administrator under the *Allergan Global Opioid Settlement Agreement*.

Exhibit A

Allergan-Alabama Local Government Allocations

\$14,142,979.04	
Alabama Local Government	Net to Alabama Local Government
Abbeville	\$7,644.64
Alabaster	\$70,950.64
Albertville	\$42,847.41
Alexander City	\$44,134.91
Anniston	\$113,961.19
Arab	\$27,026.58
Argo	\$3,406.11
Ashland	\$5,420.12
Ashville	\$2,526.10
Athens	\$48,026.30
Attalla	\$23,441.04
Auburn	\$67,792.33
<i>Autauga County</i>	\$35,376.57
<i>Baldwin County</i>	\$201,845.47
<i>Barbour County</i>	\$10,353.15
Bay Minette	\$17,710.43
Berry	\$2,931.35
Bessemer	\$81,734.35
<i>Bibb County</i>	\$45,174.14
Birmingham	\$580,987.38
<i>Blount County</i>	\$105,819.20
Boaz	\$23,641.60
Brent	\$8,868.22
Brewton	\$30,382.57
Bridgeport	\$215.57
Brookwood	\$978.09
Brundidge	\$1,513.22
<i>Bullock County</i>	\$8,812.10
Butler	\$11,687.84
<i>Butler County</i>	\$7,544.71
Calera	\$33,387.97
<i>Calhoun County</i>	\$107,048.39
Camp Hill	\$865.47

Carbon Hill	\$13,267.90
Cedar Bluff	\$8,158.50
Center Point	\$1,526.81
Centre	\$20,588.47
Centreville	\$3,260.37
Chambers County	\$60,672.49
Chelsea	\$11,025.16
Cherokee	\$1,193.22
Cherokee County	\$41,837.82
Chickasaw	\$11,474.34
Childersburg	\$13,782.91
Chilton County	\$90,382.32
Choctaw County	\$17,656.19
Clanton	\$23,699.25
Clarke County	\$33,714.13
Clay County	\$24,279.93
Cleburne County	\$29,187.52
Cleveland	\$1,816.30
Coffee County	\$42,804.80
Colbert County	\$46,023.75
Columbiana	\$6,873.61
Conecuh County	\$21,685.74
Coosa County	\$16,909.46
Cordova	\$13,605.68
Covington County	\$63,441.92
Crenshaw County	\$20,453.64
Cullman	\$73,854.90
Cullman County	\$125,912.31
Dadeville	\$3,440.57
Dale County	\$34,147.20
Daleville	\$10,884.87
Dallas County	\$28,396.03
Daphne	\$45,777.41
Dauphin Island	\$6,561.96
De Kalb County	\$57,075.30
Decatur	\$258,607.38
Demopolis	\$20,090.32
Dora	\$13,165.29
Dothan	\$153,082.02

Double Springs	\$11,267.63
Douglas	\$138.60
East Brewton	\$3,647.44
Elmore County	\$76,393.73
Enterprise	\$45,641.85
Escambia County	\$91,491.13
Etowah County	\$142,770.18
Eufaula	\$30,246.01
Evergreen	\$5,897.24
Fairfield	\$16,644.51
Fairhope	\$30,653.67
Faunsdale	\$39.22
Fayette County	\$19,742.91
Fayette	\$11,214.64
Florence	\$124,285.79
Foley	\$47,217.47
Fort Deposit	\$708.51
Fort Payne	\$80,822.12
Franklin County	\$41,044.11
Fultondale	\$13,578.85
Gadsden	\$116,147.01
Gardendale	\$23,203.24
Geneva	\$9,445.45
Geneva County	\$31,397.92
Georgiana	\$2,608.39
Geraldine	\$1,568.94
Gilbertown	\$287.18
Grant	\$2,425.46
Graysville	\$5,248.54
Greene County	\$9,683.74
Greensboro	\$3,550.55
Greenville	\$24,348.61
Guin	\$3,480.76
Gulf Shores	\$66,976.06
Guntersville	\$36,215.52
Gurley	\$1,031.95
Hale County	\$18,764.85
Haleyville	\$20,021.38
Hamilton	\$12,400.21

Hammondville	\$698.58
Hartselle	\$8,729.44
Headland	\$8,933.06
Helena	\$19,138.54
Henagar	\$4,890.06
Henry County	\$11,573.30
Homewood	\$55,755.38
Hoover	\$197,676.25
Houston County	\$78,443.80
Hueytown	\$26,695.26
Huntsville	\$437,834.69
Irondale	\$24,201.28
Jackson County	\$22,522.90
Jacksonville	\$35,114.28
Jasper	\$200,867.61
Jefferson County	\$756,153.61
Killen	\$2,611.83
Lamar County	\$23,497.12
Lanett	\$18,210.92
Lauderdale County	\$66,703.78
Lawrence County	\$62,270.72
Lee County	\$40,491.79
Leeds	\$21,329.87
Leesburg	\$2,693.93
Leighton	\$804.57
Level Plains	\$498.80
Limestone County	\$81,698.55
Lincoln	\$25,927.06
Linden	\$2,444.24
Locust Fork	\$556.02
Louisville	\$650.32
Lowndes County	\$9,529.76
Loxley	\$5,775.24
Luverne	\$2,246.78
Macon County	\$19,416.81
Madison County	\$184,262.15
Madison	\$64,646.08
Marengo County	\$6,837.04
Marion	\$3,233.45

Marion County	\$31,767.92
Marshall County	\$104,126.56
McKenzie	\$626.78
Midfield	\$55.38
Millbrook	\$33,984.41
Mobile	\$443,105.86
Mobile County	\$378,943.80
Monroe County	\$25,845.47
Monroeville	\$14,579.30
Montgomery	\$252,854.28
Montgomery County	\$139,473.57
Moody	\$5,083.57
Morgan County	\$43,072.39
Moulton	\$18,597.11
Mountain Brook	\$48,947.67
Munford	\$3,545.42
Muscle Shoals	\$38,223.80
Nauvoo	\$2,661.21
New Hope	\$1,863.47
Northport	\$59,554.06
Oakman	\$5,960.94
Oneonta	\$38,526.70
Opelika	\$73,666.33
Opp	\$12,720.09
Orange Beach	\$41,301.83
Oxford	\$50,133.49
Ozark	\$40,499.08
Parrish	\$16,626.21
Pelham	\$94,369.08
Pell City	\$63,229.87
Perry County	\$7,238.63
Phenix City	\$85,934.37
Pickens County	\$40,836.66
Piedmont	\$20,145.96
Pike County	\$4,079.62
Pike Road	\$1,619.92
Pleasant Grove	\$7,095.57
Powell	\$755.83
Prattville	\$82,827.50

Priceville	\$1,671.73
Prichard	\$15,675.89
Ragland	\$2,133.85
Rainbow City	\$18,898.35
Rainsville	\$26,809.44
<i>Randolph County</i>	\$24,365.97
Red Bay	\$8,939.93
Roanoke	\$14,975.45
Robertsdale	\$12,202.40
Rockford	\$837.41
<i>Russell County</i>	\$24,239.66
Russellville	\$45,151.14
Saraland	\$34,113.18
Satsuma	\$8,906.63
Scottsboro	\$94,541.48
Selma	\$36,237.21
Semmes	\$5,766.72
Sheffield	\$22,930.19
<i>Shelby County</i>	\$227,362.97
Sipsey	\$5,347.65
Slocomb	\$6,294.10
Spanish Fort	\$4,035.83
Springville	\$8,116.98
<i>St Clair County</i>	\$144,103.39
Sumiton	\$33,138.36
Summerdale	\$3,440.32
<i>Sumter County</i>	\$16,218.86
Sweet Water	\$42.69
Sylacauga	\$32,842.00
Talladega	\$33,461.96
<i>Talladega County</i>	\$75,641.38
<i>Tallapoosa County</i>	\$27,033.29
Tarrant	\$12,863.25
Thomasville	\$12,429.14
Troy	\$45,062.92
Trussville	\$34,782.78
Tuscaloosa	\$273,957.10
<i>Tuscaloosa County</i>	\$139,001.74
Tuscumbia	\$12,189.07

Tuskegee	\$13,059.28
Union Springs	\$5,808.51
Uniontown	\$2,581.54
Vance	\$1,369.98
Vernon	\$4,583.66
Vestavia Hills	\$43,934.21
Walker County	\$208,529.11
Washington County	\$22,150.52
Weaver	\$6,014.74
West Blocton	\$5,754.56
Wetumpka	\$22,791.27
Wilcox County	\$12,069.05
Winfield	\$27,065.57
Winston County	\$21,622.21
Woodville	\$65.72
Yellow Bluff	\$416.96
Attentus Mouton, LLC d/b/a Lawrence Medical Center (Lawrence County Health Care Authority)	\$15,146.74
Bibb County Healthcare Authority d/b/a Bibb Medical Center	\$56,806.55
Cullman Regional Medical Center, Inc. (Healthcare Authority of Cullman County)	\$48,971.24
Dale County Healthcare Authority d/b/a Dale Medical Center	\$32,408.87
DCH Health Care Authority (Tuscaloosa) (d/b/a DCH Regional Medical Center and Northport Medical Center	\$251,420.82
Decatur Morgan Hospital-Parkway (Health Care Authority of the City of Huntsville)	\$42,095.29
East Alabama Health Care Authority	\$122,427.15
Escambia County Health Care Authority d/b/a D.W. McMillan Memorial Hospital and Atmore Community Hospital	\$16,750.65
Geneva County Health Care Authority d/b/a Wiregrass Medical Center	\$52,800.96
Greene County Health System/Hospital Board	\$33,501.30
Health Care Authority of Clarke County d/b/a Grove Hill Memorial Hospital	\$10,783.67
Health Care Authority of the City of Huntsville d/b/a Huntsville Hospital	\$336,389.11
Health Care Authority of the City of Huntsville d/b/a Huntsville Hospital for Women and Children	\$0.00
Health Care Authority of the City of Huntsville d/b/a Madison Hospital	\$0.00

Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Baptist Medical Center East (Montgomery)	\$75,495.79
Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Baptist Medical Center South (Montgomery)	\$166,816.81
Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Prattville Baptist Hospital	\$27,947.96
HH Health System-Athens Limestone, LLC d/b/a Athens Limestone Hospital (Healthcare Authority of the City of Huntsville)	\$23,248.48
HH Health System-Morgan, LLC d/b/a Decatur Morgan Hospital Decatur	\$131,741.35
HH Health Systems-Shoals LLC d/b/a Hellen Keller Hospital (Healthcare Authority of the City of Huntsville)	\$63,872.67
HH Health Systems-Shoals, LLC d/b/a Red Bay Hospital (Healthcare Authority of the City of Huntsville)	\$8,769.85
Houston County Health Care Auththority	\$123,830.32
J Paul Jones Hospital	\$7,306.73
HH Health System-Jackson, LLC d/b/a Highlands Medical Center (Jackson County Health Care Authority)	\$33,958.16
Lakeland Community Hospital HCA Winston County	\$18,251.28
HH Health System-Marshall, LLC d/b/a Marshall Medical Center North (Marshall County Health Care Authority)	\$37,138.72
HH Health System-Marshall, LLC d/b/a Marshall Medical South (Marshall County Health Care Authority)	\$62,441.35
Medical West Hospital Authority (UAB)	\$91,628.92
Monroe County Health Care Authority d/b/a Monroe County Hospital	\$17,133.86
Northeast Alabama Regional Medical Center (Health Care Authority of the City of Anniston)	\$205,702.82
Sylacauga Health Care Authority d/b/a Coosa Valley Medical Center	\$51,708.53
Tombigbee Health Care Authority d/b/a Brian W. Whitfield Memorial Hospital	\$24,397.69
Jefferson County Board of Health	\$428,095.52
Mobile County Board of Health	\$283,741.73
Family Oriented Primary Health Clinic	

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been filed through the court electronic filing system and that where appropriate, I have served a copy of same has been deposited in the U.S. Mail, properly addressed and postage prepaid, on this date for service on the counsel as required by law.

Is/Christina D. Crow
OF COUNSEL



IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

THE STATE OF ALABAMA,	)	
	)	
Plaintiff,	)	
	)	
-vs-	)	CASE NO. CV-2019-901174.0
	)	
ENDO HEALTH SOLUTIONS, INC.,	)	
et al.,	)	
	)	
Defendants.	)	

SUBMISSION OF SPECIAL MASTER REPORT

COMES NOW the Local Government Executive Committee and submits the Cencora and Cardinal Alabama Settlement Political Subdivisions and Special District Special Master Report attached hereto.

/s/ Christina D. Crow

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/s/ Keith Jackson

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been filed through the court electronic filing system and that where appropriate, I have served a copy of same has been deposited in the U.S. Mail, properly addressed and postage prepaid, on this date for service on the counsel as required by law.

/s/Christina D. Crow
OF COUNSEL

**Cardinal and Cencora-Alabama Settlement
Political Subdivision & Special District Special Master Report**

I. Total Amounts to the State of Alabama, Political Subdivisions, and Special Districts

Pursuant to Exhibit F of the *Cardinal & Cencora Alabama Settlement Agreement* (“CCASA”), Cardinal & Cencora will pay a total of up to \$245 million over 10 payment years. \$25 million of the \$245 million is being paid for State Attorneys’ Fees & Costs. Provided all terms and conditions of the settlement agreement are satisfied, Cardinal & Cencora will pay the remaining \$220 million in equal installments of \$22 million per year for ten years. Pursuant to §B.1 of the *Cardinal and Cencora Allocation Agreement*, “ ... [t]he State, Political Subdivisions, and Special Districts shall divide settlement funds recovered by the State with 40% (\$88,000,000) going to the Political Subdivisions, 10% (\$22,000,000) going to the Special Districts, and 50% (\$110,000,000) going to the State.”

Cardinal & Cencora Gross Settlement Summary Before Political Subdivision & Special District Fees/Expenses	Gross Amounts
State of Alabama	\$110,000,000
State Attorneys’ Fees & Costs	\$25,000,000
Political Subdivisions	\$88,000,000
Special Districts	\$22,000,000
	\$245,000,000

II. Administrative Costs

Pursuant to the *Order Establishing Qualified Settlement Fund and Appointing Receiver for the Fund* (see Doc. 2834) and the *Order Appointing Special Master* (see Doc. 2818), the administrative costs attributable to the Political Subdivision and Special District portion of the *Cardinal & Cencora-Alabama State-Wide Opioid Settlement Agreement* are \$120,000. Pursuant to §2 of the Appointing Order, \$60,000 shall be paid to Special Master Joseph Tann. Pursuant to ¶8

of the QSF Order, \$60,000 shall be paid to Richard Weinberg of Winbridge Partners for his services as the court-appointed Receiver.

III. Political Subdivision & Special District Attorneys' Fees

A. Attorneys' Fees – Contingency Fees

Pursuant to §VII.B of the CCASA, “up to \$25,000,000 of the Settlement Payment may be apportioned by the court-appointed Special Master ... towards attorneys’ fees for counsel for litigating political subdivisions and litigating public health care authorities.” In accordance with the CCASA, the Special Master hereby apportions the full \$25,000,000 to attorneys’ fees and costs for attorneys representing Alabama litigating political subdivisions and litigating public health care authorities. The full amount, less \$60,000 to be paid to the Special Master in accordance with *Order Appointing Special Master* (see Doc. 2818), will be used to pay attorneys’ fees for the Political Subdivisions and Special Districts.¹

Eighty percent (80%) of the Political Subdivisions/Special Districts attorneys’ fees will be paid to attorneys representing Political Subdivisions and twenty percent (20%) of the Political Subdivisions/Special Districts attorneys’ fees will be paid to attorneys representing Special Districts. The allocation/division of the \$24,940,000 was determined by multiplying the percentage of the Political Subdivision/Special District funds to be received by the client by the applicable contingency fee contract rate, capped at a rate of 25%. In other words, the attorney fee formula used the lower of: (a) the actual contract rate, or (b) 25%. The Attorneys representing Political Subdivision and Special Districts will collectively be paid equal installments of

¹ Pursuant §2 of the Appointing Order, the Special Master shall receive a separate payment of \$30,000 per Settling Defendant... for work performed to determine the necessary and appropriate methodology for allocating attorneys’ fees. The expense will be taken out of the \$25,000,000 allocated to local government attorneys’ fees.

\$3,562,857.14 over 7 years for a cumulative total of \$24,940,000. After the expiration of the objection period described in Section IV of this Special Master Report, the Special Master will separately notify the attorneys representing Political Subdivisions and Special Districts of their attorney fee awards for each of the Political Subdivision and Special District that they represent.

B. Attorneys' Fees – Committee Fee Fund

To compensate the court-appointed Committees for common benefit work (*see* Doc. 2675), the Court ordered that “two percent (2%) of the portion of the Johnson & Johnson and McKesson settlements be allocated to the Alabama local governments, boards of health, and public health authorities ***that have filed cases in the MDL***” be paid into the Committee Fee Fund, as defined by the Court in Doc. 2675. On January 21, 2023, the Court increased the percentage from 2% to 3.5% for all settlements with an effective date on or after September 20, 2022. (*see* Doc. 2971)

The total Committee Fee Fund award for the CCASA is \$3,542,863.75. Pursuant to the original Committee Fee Fund Court Order, the full Committee Fee Fund award will be distributed, “*as soon as those funds are available.*” (i.e., Payment Year 1) The court-appointed Committee Fee Fund members voluntarily agreed to the division and allocation of the Committee Fee Fund compensation, and the Special Master accepted their agreement.

IV. Payments to Alabama Political Subdivisions & Special Districts

A. Payments to Political Subdivisions

Net of all applicable administrative fees and expenses, and after accounting for the attorneys' fees, \$64,824,000 is available to pay Political Subdivisions. The methodology for awarding the funds to Political Subdivisions is substantially similar to the methodology used in MDL 2804. At the county-level, the model incorporates the following factors:

1. The number of persons suffering from opioid use disorder in the county;
2. The number of overdose deaths that occurred in the county; and
3. The amount of opioids distributed within the county by Morphine Milligram Equivalent.

For Cities/Towns, the formula draws on US Census Bureau data on local government spending by function. The functions or expenditure categories examined for each jurisdiction were: elementary and secondary education net of capital outlay, public welfare (including child protective services), hospitals net of capital outlay, health, police protection, fire protection, corrections net of capital outlay, housing and community development, and judicial and legal.

All Alabama Political Subdivisions eligible to participate in the CCASA were assigned an allocation amount using the allocation model referenced above. The \$64,824,000 for Political Subdivisions will be paid over ten years is hereby allocated as set forth in the attached Exhibit A-

1. If a Political Subdivision wishes to object to its payment amount, it must do so **no later than 5:00 pm CDT on August 19, 2024, at which time all Political Subdivision amounts will become final.**

B. Payments to Special Districts

Net of all applicable administrative fees and expenses, and after accounting for attorneys' fees, \$16,513,136.25 is available to pay Special Districts. The allocation percentages for payments to Special Districts were determined by an arbitration proceeding conducted by the Honorable Sally Shushan, a retired federal magistrate judge on the United States District Court for the Eastern District of Louisiana. For the CCASA, the Special Master sees no reason to deviate from the previously arbitrated allocations. For newly added Special Districts, the Special Master used an allocation methodology based on the number of beds for each hospital/healthcare authority. The amounts for each Special District are attached hereto as Exhibit B. Like the Political Subdivisions,

these amounts will be paid over ten years. If a Special District wishes to object to its payment amount, it must do so **no later than 5:00 pm CDT on August 19, 2024, at which time all Special**

District amounts will become final.

Cardinal & Cencora – Political Subdivision & Special District Summary		
Committee Fee Fund Payment	\$3,542,863.75	3.22%
Special Master + Receiver Expense	\$180,000.00	0.16%
Political Subdivision Attorneys' Fees	\$19,952,000.00	18.14%
Special Districts Attorneys' Fees	\$4,988,000.00	4.53%
Payments to Political Subdivisions	\$64,824,000.00	58.93%
Payments to Special Districts	\$16,513,136.25	15.01%
	\$110,000,000.00	100.00%

Political Subdivision/Special Districts Annual Payments			
Description	Payment Year 1	Payment Years 2 - 7	Payment Years 8 – 10
Committee Fee Fund	\$3,542,863.75		
Administrative Costs	\$180,000.00		
Attorneys' Fees	\$3,562,857.14	\$3,562,857.14	
Net to Subdivisions/SD's	\$3,714,279.11	\$7,437,142.86	\$11,000,000.00
	\$11,000,000.00	\$11,000,000.00	\$11,000,000.00

IT IS SO ORDERED.

SPECIAL MASTER



Joseph C. Tann, ESQ

Dated: August 9, 2024

Exhibit A

Cardinal & Cencora-Alabama Settlement - Political Subdivision Allocations

\$64,824,000	
Alabama Political Subdivisions	Net to Political Subdivision (Cumulative)
Abbeville	\$43,138.96
Alabaster	\$424,082.67
Albertville	\$241,440.25
Alexander City	\$249,054.49
Anniston	\$643,086.15
Arab	\$154,541.91
Argo	\$19,220.82
Ashland	\$31,340.67
Ashville	\$14,444.58
Athens	\$280,852.28
Attalla	\$132,087.61
Auburn	\$396,441.75
Autauga County	\$202,288.31
Baldwin County	\$1,180,369.12
Barbour County	\$58,423.10
Bay Minette	\$101,270.81
Berry	\$16,541.67
Bessemer	\$488,538.49
Bibb County	\$264,173.19
Birmingham	\$3,359,435.97
Blount County	\$597,140.67
Boaz	\$133,217.71
Brent	\$50,043.61
Brewton	\$177,673.78
Bridgeport	\$1,214.70
Brookwood	\$5,592.83
Brundidge	\$8,749.87
Bullock County	\$51,532.13
Butler	\$65,859.63
Butler County	\$43,141.75
Calera	\$195,248.98
Calhoun County	\$586,111.48
Camp Hill	\$4,876.80

Carbon Hill	\$74,871.15
Cedar Bluff	\$45,972.20
Center Point	\$8,615.80
Centre	\$116,013.64
Centreville	\$18,398.40
Chambers County	\$342,376.56
Chelsea	\$63,305.03
Cherokee	\$6,723.64
Cherokee County	\$244,662.78
Chickasaw	\$64,750.05
Childersburg	\$77,665.11
Chilton County	\$528,545.43
Choctaw County	\$100,960.69
Clanton	\$135,515.78
Clarke County	\$192,782.27
Clay County	\$132,937.50
Cleburne County	\$164,705.99
Cleveland	\$10,234.64
Coffee County	\$250,317.55
Colbert County	\$255,613.30
Columbiana	\$40,196.08
Conecuh County	\$124,002.21
Coosa County	\$97,775.36
Cordova	\$76,777.25
Covington County	\$366,839.44
Crenshaw County	\$115,420.43
Cullman	\$431,894.95
Cullman County	\$719,984.85
Dadeville	\$19,415.21
Dale County	\$195,258.61
Daleville	\$62,241.27
Dallas County	\$166,056.74
Daphne	\$257,950.50
Dauphin Island	\$37,029.31
De Kalb County	\$321,612.77
Decatur	\$1,512,306.27
Demopolis	\$117,485.89
Dora	\$74,184.93
Dothan	\$875,345.17
Double Springs	\$64,429.90

Douglas	\$780.96
East Brewton	\$21,329.77
Elmore County	\$446,741.73
Enterprise	\$266,908.29
Escambia County	\$523,159.54
Etowah County	\$825,538.23
Eufaula	\$170,679.09
Evergreen	\$33,278.30
Fairfield	\$93,925.41
Fairhope	\$179,259.15
Faunsdale	\$221.31
Fayette County	\$111,409.79
Fayette	\$63,284.49
Florence	\$742,874.82
Foley	\$276,122.32
Fort Deposit	\$4,143.24
Fort Payne	\$467,336.68
Franklin County	\$231,278.85
Fultondale	\$76,515.29
Gadsden	\$671,595.41
Gardendale	\$133,229.99
Geneva	\$53,300.96
Geneva County	\$177,179.29
Georgiana	\$14,719.22
Geraldine	\$8,840.81
Gilbertown	\$1,618.23
Grant	\$13,667.17
Graysville	\$29,574.89
Greene County	\$56,629.38
Greensboro	\$20,035.89
Greenville	\$137,399.88
Guin	\$20,355.08
Gulf Shores	\$391,668.30
Guntersville	\$204,070.32
Gurley	\$6,034.73
Hale County	\$105,890.56
Haleyville	\$114,485.17
Hamilton	\$72,515.04
Hammondville	\$3,936.43
Hartselle	\$51,048.77

Headland	\$50,409.53
Helena	\$111,919.97
Henagar	\$27,554.94
Henry County	\$65,308.49
Homewood	\$333,258.34
Hoover	\$1,181,540.71
Houston County	\$448,553.05
Hueytown	\$156,110.82
Huntsville	\$2,560,406.88
Irondale	\$144,654.67
Jackson County	\$126,913.97
Jacksonville	\$200,788.58
Jasper	\$1,131,865.95
Jefferson County	\$4,421,899.37
Killen	\$14,717.39
Lamar County	\$130,706.14
Lanett	\$102,764.69
Lauderdale County	\$398,698.53
Lawrence County	\$364,151.98
Lee County	\$232,498.59
Leeds	\$120,365.05
Leesburg	\$15,404.32
Leighton	\$4,533.64
Level Plains	\$2,814.74
Limestone County	\$467,164.14
Lincoln	\$148,254.69
Linden	\$13,792.93
Locust Fork	\$3,137.63
Louisville	\$3,718.62
Lowndes County	\$55,728.95
Loxley	\$33,023.64
Luverne	\$12,301.57
Macon County	\$109,569.59
Madison County	\$1,053,637.69
Madison	\$378,042.90
Marengo County	\$39,982.27
Marion	\$18,908.88
Marion County	\$179,008.60
Marshall County	\$595,410.77
McKenzie	\$3,536.95

Midfield	\$312.50
Millbrook	\$198,736.91
Mobile	\$2,591,232.15
Mobile County	\$2,216,019.76
Monroe County	\$151,141.36
Monroeville	\$85,258.06
Montevallo	\$66,158.80
Montgomery	\$1,426,863.80
Montgomery County	\$787,053.25
Moody	\$29,068.61
Morgan County	\$251,882.36
Moulton	\$108,753.71
Mountain Brook	\$286,240.38
Munford	\$19,411.87
Muscle Shoals	\$215,386.76
Nauvoo	\$15,017.26
New Hope	\$10,500.45
Northport	\$340,538.74
Oakman	\$33,637.78
Oneonta	\$217,093.54
Opelika	\$430,792.27
Opp	\$74,385.66
Orange Beach	\$236,169.85
Oxford	\$282,904.66
Ozark	\$236,833.92
Parrish	\$93,822.16
Pelham	\$551,859.51
Pell City	\$356,807.91
Perry County	\$40,847.78
Phenix City	\$502,534.36
Pickens County	\$230,109.92
Piedmont	\$115,197.50
Pike County	\$23,857.11
Pike Road	\$9,301.36
Pleasant Grove	\$41,494.11
Powell	\$4,259.06
Prattville	\$484,365.73
Priceville	\$9,776.11
Prichard	\$88,343.43
Ragland	\$12,201.61

Rainbow City	\$108,063.53
Rainsville	\$151,068.11
Randolph County	\$142,489.36
Red Bay	\$50,375.47
Roanoke	\$87,574.74
Robertsdale	\$68,759.12
Rockford	\$4,725.50
Russell County	\$136,785.07
Russellville	\$254,421.51
Saraland	\$199,489.94
Satsuma	\$50,260.35
Scottsboro	\$532,730.38
Selma	\$211,911.09
Semmes	\$33,723.14
Sheffield	\$129,209.00
Shelby County	\$1,248,519.27
Sipsey	\$30,176.91
Slocomb	\$35,517.82
Spanish Fort	\$23,601.03
Springville	\$46,414.05
St Clair County	\$833,247.16
Sumiton	\$186,730.85
Summerdale	\$19,672.26
Sumter County	\$94,846.07
Sweet Water	\$240.87
Sylacauga	\$185,328.35
Talladega	\$183,210.99
Talladega County	\$414,151.79
Tallapoosa County	\$156,314.23
Tarrant	\$73,859.10
Thomasville	\$71,071.63
Troy	\$263,522.80
Trussville	\$196,280.19
Tuscaloosa	\$1,566,526.47
Tuscaloosa County	\$812,866.17
Tuscumbia	\$67,697.39
Tuskegee	\$73,693.91
Union Springs	\$33,967.51
Uniontown	\$14,567.71
Vance	\$7,730.83

Vernon	\$25,457.35
Vestavia Hills	\$247,564.20
<i>Walker County</i>	\$1,175,037.65
<i>Washington County</i>	\$129,533.66
Weaver	\$33,941.30
West Blocton	\$32,473.16
Wetumpka	\$133,280.68
<i>Wilcox County</i>	\$70,578.43
Winfield	\$152,731.77
<i>Winston County</i>	\$125,170.50
Woodville	\$370.33
Yellow Bluff	\$2,352.92

Exhibit B**Cardinal & Cencora Settlement - Alabama Special District Allocations**

	\$16,513,136.25
Alabama Special District	Net to Political Special Districts (Cumulative)
Attentus Mouton, LLC d/b/a Lawrence Medical Center (Lawrence County Health Care Authority)	\$85,150.62
Bibb County Healthcare Authority d/b/a Bibb Medical Center	\$323,660.78
Cullman Regional Medical Center, Inc. (Healthcare Authority of Cullman County)	\$271,293.82
Dale County Healthcare Authority d/b/a Dale Medical Center	\$184,652.62
DCH Health Care Authority (Tuscaloosa) (d/b/a DCH Regional Medical Center and Northport Medical Center	\$1,400,455.30
Decatur Morgan Hospital-Parkway (Health Care Authority of the City of Huntsville)	\$237,629.62
East Alabama Health Care Authority	\$691,106.16
Escambia County Health Care Authority d/b/a D.W. McMillan Memorial Hospital and Atmore Community Hospital	\$95,438.44
Geneva County Health Care Authority d/b/a Wiregrass Medical Center	\$300,838.55
Greene County Health System	\$190,876.87
Health Care Authority of Clarke County d/b/a Grove Hill Memorial Hospital	\$62,242.46
Health Care Authority of the City of Huntsville d/b/a Huntsville Hospital	\$1,859,451.81
Health Care Authority of the City of Huntsville d/b/a Huntsville Hospital for Women and Children	\$0.00
Health Care Authority of the City of Huntsville d/b/a Madison Hospital	\$0.00
Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Baptist Medical Center East (Montgomery)	\$431,547.71
Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Baptist Medical Center South (Montgomery)	\$846,497.43

Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Prattville Baptist Hospital	\$159,755.64
HH Health System-Athens Limestone, LLC d/b/a Athens Limestone Hospital (Healthcare Authority of the City of Huntsville)	\$130,696.29
HH Health System-Morgan, LLC d/b/a Decatur Morgan Hospital Decatur	\$740,612.33
HH Health Systems-Shoals LLC d/b/a Hellen Keller Hospital (Healthcare Authority of the City of Huntsville)	\$352,483.94
HH Health Systems-Shoals, LLC d/b/a Red Bay Hospital (Healthcare Authority of the City of Huntsville)	\$49,506.17
Houston County Health Care Auththority	\$699,027.15
J Paul Jones Hospital	\$41,585.18
Jackson County Healthcare Authority	\$188,123.45
Lakeland Community Hospital HCA Winston County	\$101,662.68
Marshall County Health Care Authority (North)	\$178,222.22
Marshall County Health Care Authority (South)	\$352,483.94
Medical West Hospital Authority (UAB)	\$510,388.15
Monroe County Health Care Authority d/b/a Monroe County Hospital	\$95,438.44
Northeast Alabama Regional Medical Center	\$1,199,689.19
Northwest Medical Center HCA of Winfield	\$75,249.38
Sylacauga Health Care Authority d/b/a Coosa Valley Medical Center	\$294,614.30
Tombigbee Health Care Authority d/b/a Brian W. Whitfield Memorial Hospital	\$139,008.16
Troy Regional Medical	\$116,834.57
Jefferson County Board of Health	\$2,500,932.99
Mobile County Board of Health	\$1,605,979.90
Family Oriented Primary Health Clinic	\$0.00



ELECTRONICALLY FILED
11/22/2024 8:32 AM
03-CV-2019-901174.00
CIRCUIT COURT OF
MONTGOMERY COUNTY, ALABAMA
GINA J. ISHMAN, CLERK

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

THE STATE OF ALABAMA,

Plaintiff,

-vs-

**ENDO HEALTH SOLUTIONS, INC.,
et al.,**

Defendants.

CASE NO. CV-2019-901174.0

SUBMISSION OF SPECIAL MASTER REPORT

COMES NOW the Local Government Executive Committee and submits the CVS-Alabama Political Subdivisions and Government Public Health Entities Special Master Report attached hereto.

/s/ Christina D. Crow

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/s/ Keith Jackson

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Birmingham, AL 35209
(205) 879-5000
kj@rileyjacksonlaw.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been filed through the court electronic filing system and that where appropriate, I have served a copy of same has been deposited in the U.S. Mail, properly addressed and postage prepaid, on this date for service on the counsel as required by law.

Is/Christina D. Crow
OF COUNSEL

**CVS-Alabama
Political Subdivision & Governmental Public Health Entity
Special Master Report**

I. Total Gross Amount to the State of Alabama, Political Subdivisions, and Governmental Public Health Entities

In 2023, CVS (“CVS”) and its respective past and present direct or indirect parents, subsidiaries, divisions, affiliates, joint ventures, predecessors, successors, and assigns entered into a global settlement with various states and political subdivisions. CVS agreed to pay up to \$4.9 billion over 10 years. The State of Alabama (“the State”) and all relevant Alabama Political Subdivisions and Governmental Public Health Entities (collectively, “Local Governments”) are participating in the CVS Settlement Agreement. According to reports provided to the Special Master by the national Directing Administrator, the State of Alabama can reasonably expect to receive a gross total of \$76,154,829.65 to be paid to the State and Local Governments over the ten Payment Years.¹

The State and Local Governments entered into an intergovernmental agreement, the *Teva, Allergan, CVS, & Walgreens Allocation Agreement*, to allocate settlement proceeds between themselves. Pursuant to §B.1 of the *Teva, Allergan, CVS, & Walgreens Allocation Agreement*, “The State, Political Subdivisions, and Governmental Public Health Entities shall divide settlement funds recovered by the State with 40% going to the Political Subdivisions, 10% going to the Government Public Health Entities, and 50% going to the State.”

Accordingly, the allocation of the CVS gross settlement to the State and Local Governments is as follows:

¹ For all purposes relevant to this Special Master Report, Payment Year 1 and Payment Year 2 will both be issued in 2024.

CVS Settlement Summary	Percentage	Gross Amounts
State of Alabama	50%	\$38,077,414.83
Gross to Political Subdivisions	40%	\$30,461,931.86
Gross to Special Districts	10%	\$7,615,482.97
Total Amount	100%	\$76,154,829.65

II. Administrative Costs

Pursuant to the *Order Establishing Qualified Settlement Fund and Appointing Receiver for the Fund* (see Doc. 2834) and the *Order Appointing Special Master* (see Doc. 2818), the administrative costs attributable to the Alabama Local Government portion are \$60,000. Pursuant to §2 of the Appointing Order, \$30,000 shall be paid to Special Master Joseph Tann. Pursuant to ¶8 of the QSF Order, \$30,000 shall be paid to Richard Weinberg of Winbridge Partners for his services as the court-appointed Receiver.

III. Political Subdivision & Governmental Public Health Entity Attorneys' Fees

A. *Attorneys' Fees – Committee Fee Fund*

To compensate the court-appointed leadership Committees for common benefit work (see Doc. 2675), the Court ordered, “the Committee Fee Fund shall be funded in the future in additional amounts equaling two percent (2%) of any future gross recoveries from any opioid supply chain participants, whether manufacturer, distributor, or retailer, that are allocated in whole or in part to Alabama local governments, boards of health, and public health authorities **that have filed cases in the MDL.**” On January 21, 2023, the Court increased the percentage from 2% to 3.5% for all settlements with an effective date on or after September 20, 2022. (see Doc. 2971)

The total Committee Fee Fund award for the CVS Settlement is \$1,225,085.36. Pursuant to the original Committee Fee Fund Court Order, the full Committee Fee Fund award will be distributed “as soon as those funds are available.” (i.e., Payment Year 1) The court-appointed

Committee Fee Fund members voluntarily agreed to the division and allocation of the Committee Fee Fund compensation, and the Special Master accepted their agreement.

B. Attorneys' Fees – National Contingency Fee Fund & Alabama Backstop/Deficiency Fund

Many law firms representing Alabama Local Governments were eligible to participate in the CVS National Contingency Fee Fund established by Exhibit R of the *CVS Global Opioid Settlement Agreement*. The law firms representing Alabama Local Governments expect to collectively receive approximately \$3.97 million over five Payment Years from the CVS National Contingency Fee Fund. Additionally, the Special Master concludes that allocating \$3,944,286.59 from the Alabama Local Government Share to the Alabama Backstop/Deficiency Fund appropriately compensates counsel representing Alabama Local Governments.² This amount, less \$30,000 to be paid to the Special Master in accordance with *Order Appointing Special Master* (see Doc. 2818), will be used to pay attorneys' fees to the law firms representing Local Governments. These fees will be paid in equal installments over five Payment Years.

The Special Master will separately notify the attorneys representing Alabama Local Governments of their attorney fee awards for each client via the Rubris Crosslink System.

IV. Payments to Alabama Political Subdivisions & Governmental Public Health Entities

A. Payments to Political Subdivisions

Net of all applicable administrative fees and expenses, and after accounting for the attorneys' fees, \$32,848,042.88 is available to pay Political Subdivisions & Governmental Public

² Law firms representing Alabama Local Governments whose clients named CVS in a lawsuit before the cutoff date imposed by Exhibit R of the CVS Settlement Agreement are capped at an amount equal to 25% of their client's gross recovery. Law firms representing Alabama Local Governments whose clients did not name CVS in a lawsuit before the cutoff date imposed by Exhibit R of the CVS Settlement Agreement are capped at an amount equal to 15% of their client's gross recovery.

Health Entities. The methodology for awarding the funds to Political Subdivisions is substantially similar to the methodology used in MDL 2804. At the county-level, the model incorporates the following factors:

1. The number of persons suffering from opioid use disorder in the county;
2. The number of overdose deaths that occurred in the county; and
3. The amount of opioids distributed within the county by Morphine Milligram Equivalent.

For Cities/Towns, the formula draws on US Census Bureau data on local government spending by function. The functions or expenditure categories examined for each jurisdiction were: elementary and secondary education net of capital outlay, public welfare (including child protective services), hospitals net of capital outlay, health, police protection, fire protection, corrections net of capital outlay, housing and community development, and judicial and legal.

B. Payment to Governmental Public Health Entities

The allocation percentages for payments to Governmental Public Health Entities were determined by an arbitration proceeding conducted by the Honorable Sally Shushan, a retired federal magistrate judge on the United States District Court for the Eastern District of Louisiana. For the CVS allocation, the Special Master sees no reason to deviate from the previously arbitrated allocations. For newly added Governmental Public Health Entities, the Special Master used an allocation methodology based on the number of beds for each hospital/healthcare authority.

All Alabama Political Subdivisions & Governmental Public Health Entities eligible to participate in the CVS Settlement were assigned an allocation amount using the allocation model referenced above.

The \$32,848,042.88 to Alabama Local Governments will be paid over ten Payment Years.³

The net amount to each Political Subdivision and Governmental Public Health Entity is hereby allocated as outlined in the attached Exhibit A.⁴ Detailed payment schedules for each Alabama Subdivision and Governmental Public Health Entity will soon be available in the Rubris Crosslink System. If a Political Subdivision or Governmental Public Health Entity wishes to object to its payment amount, it must do so **no later than 5:00 pm CDT on December 2, 2024, at which time all Political Subdivision amounts will become final.**

Description	Total	Percentage
Committee Fee Fund	\$1,225,085.36	3.22%
Administrative Expenses	\$90,000.00	0.24%
Alabama Backstop/Deficiency Fee Fund	\$3,914,286.59	10.28%
Net to Alabama Local Governments	\$32,848,042.88	86.27%
	\$38,077,414.83	100.00%

IT IS SO ORDERED.

SPECIAL MASTER

Joseph C. Tann, ESQ

Dated: November 22, 2024

³ This amount assumes no reductions to the total amount distributed to the State of Alabama and Local Governments from the Directing Administrator under the *CVS Settlement Agreement*.

⁴ Projected payment streams to all Local Governments and law firms will be available in the Rubris Crosslink System in the near future.

Exhibit A

CVS-Alabama Local Government Allocations

\$32,848,042.88

Alabama Local Government	Net to Alabama Local Governments
Abbeville	\$16,545.37
Alabaster	\$168,864.75
Albertville	\$103,587.92
Alexander City	\$95,521.50
Anniston	\$246,647.05
Arab	\$66,249.79
Argo	\$7,371.89
Ashland	\$12,020.29
Ashville	\$6,192.16
Athens	\$116,644.61
Attalla	\$56,671.10
Auburn	\$164,651.68
Autauga County	\$77,584.96
Baldwin County	\$490,235.31
Barbour County	\$22,407.39
Bay Minette	\$43,413.28
Berry	\$7,097.06
Bessemer	\$194,530.31
Bibb County	\$109,717.40
Birmingham	\$1,395,253.54
Blount County	\$229,025.27
Boaz	\$57,155.95
Brent	\$19,193.55
Brewton	\$73,792.14
Bridgeport	\$521.16
Brookwood	\$2,397.57
Brundidge	\$3,355.90
Bullock County	\$21,402.50
Butler	\$28,256.54
Butler County	\$16,546.44
Calera	\$81,091.55
Calhoun County	\$251,466.25
Camp Hill	\$2,092.34

Carbon Hill	\$28,715.82
Cedar Bluff	\$19,723.98
Center Point	\$3,304.47
Centre	\$49,774.70
Centreville	\$7,056.46
Chambers County	\$131,313.92
Chelsea	\$24,279.79
Cherokee	\$2,578.76
Cherokee County	\$101,614.24
Chickasaw	\$24,834.01
Childersburg	\$33,321.57
Chilton County	\$219,517.47
Choctaw County	\$38,722.11
Clanton	\$58,093.57
Clarke County	\$73,939.05
Clay County	\$50,986.39
Cleburne County	\$63,170.77
Cleveland	\$3,925.36
Coffee County	\$103,962.82
Colbert County	\$98,037.04
Columbiana	\$16,694.39
Conecuh County	\$53,157.88
Coosa County	\$37,500.43
Cordova	\$29,446.88
Covington County	\$140,696.34
Crenshaw County	\$44,267.95
Cullman	\$179,376.24
Cullman County	\$308,646.64
Dadeville	\$7,446.44
Dale County	\$74,888.81
Daleville	\$23,871.80
Dallas County	\$68,967.31
Daphne	\$110,671.51
Dauphin Island	\$14,202.09
De Kalb County	\$123,350.26
Decatur	\$628,096.69
Demopolis	\$48,794.67
Dora	\$28,452.63
Dothan	\$335,726.87
Double Springs	\$27,620.12

Douglas	\$335.08
East Brewton	\$8,858.76
Elmore County	\$185,542.46
Enterprise	\$110,853.34
Escambia County	\$200,650.81
Etowah County	\$342,865.63
Eufaula	\$65,461.67
Evergreen	\$12,763.44
Fairfield	\$36,023.83
Fairhope	\$74,450.57
Faunsdale	\$84.88
Fayette County	\$47,799.43
Fayette	\$27,151.68
Florence	\$295,804.06
Foley	\$114,680.17
Fort Deposit	\$1,720.79
Fort Payne	\$179,240.70
Franklin County	\$99,228.27
Fultondale	\$32,828.23
Gadsden	\$278,929.53
Gardendale	\$51,098.57
Geneva	\$20,442.87
Geneva County	\$67,954.74
Georgiana	\$5,645.36
Geraldine	\$3,793.07
Gilbertown	\$694.29
Grant	\$5,863.80
Graysville	\$12,688.86
Greene County	\$21,719.44
Greensboro	\$7,684.50
Greenville	\$52,697.88
Guin	\$7,806.92
Gulf Shores	\$162,669.14
Guntersville	\$87,554.67
Gurley	\$2,314.54
Hale County	\$40,612.90
Haleyville	\$49,078.05
Hamilton	\$27,812.17
Hammondville	\$1,509.76
Hartselle	\$21,201.77

Headland	\$19,333.90
Helena	\$46,483.03
Henagar	\$10,568.33
Henry County	\$25,048.19
Homewood	\$132,699.56
Hoover	\$470,475.68
Houston County	\$172,036.49
Hueytown	\$64,836.53
Huntsville	\$1,063,397.78
Irondale	\$57,599.80
Jackson County	\$54,451.37
Jacksonville	\$86,075.05
Jasper	\$434,111.97
Jefferson County	\$1,836,519.80
Killen	\$5,644.66
Lamar County	\$56,078.39
Lanett	\$39,414.02
Lauderdale County	\$158,757.09
Lawrence County	\$151,240.97
Lee County	\$89,171.71
Leeds	\$46,164.40
Leesburg	\$6,603.59
Leighton	\$1,738.82
Level Plains	\$1,079.56
Limestone County	\$179,174.52
Lincoln	\$63,554.55
Linden	\$5,290.09
Locust Fork	\$1,203.39
Louisville	\$1,426.23
Lowndes County	\$21,374.09
Loxley	\$14,156.73
Luverne	\$4,718.10
Macon County	\$42,023.94
Madison County	\$451,678.57
Madison	\$144,993.27
Marengo County	\$16,605.58
Marion	\$7,252.25
Marion County	\$68,656.34
Marshall County	\$255,243.62
McKenzie	\$1,356.55

Midfield	\$119.85
Millbrook	\$82,540.14
Mobile	\$1,076,200.23
Mobile County	\$920,365.62
Monroe County	\$57,968.24
Monroeville	\$32,699.58
Montgomery	\$547,254.43
Montgomery County	\$301,863.69
Moody	\$12,461.28
Morgan County	\$104,612.72
Moulton	\$45,167.99
Mountain Brook	\$118,882.43
Munford	\$8,328.48
Muscle Shoals	\$82,608.69
Nauvoo	\$5,759.67
New Hope	\$4,505.12
Northport	\$145,983.81
Oakman	\$14,432.01
Oneonta	\$83,263.31
Opelika	\$178,918.26
Opp	\$30,894.14
Orange Beach	\$101,242.44
Oxford	\$108,504.28
Ozark	\$98,362.73
Parrish	\$35,984.23
Pelham	\$229,200.36
Pell City	\$136,848.88
Perry County	\$15,666.62
Phenix City	\$208,714.46
Pickens County	\$98,726.74
Piedmont	\$49,383.43
Pike County	\$9,908.42
Pike Road	\$3,567.41
Pleasant Grove	\$17,233.49
Powell	\$1,633.51
Prattville	\$201,168.58
Priceville	\$3,749.50
Prichard	\$37,902.99
Ragland	\$5,230.64
Rainbow City	\$46,325.21

Rainsville	\$57,940.14
<i>Randolph County</i>	\$59,179.22
Red Bay	\$21,613.17
Roanoke	\$36,371.88
Robertsdale	\$29,500.52
Rockford	\$1,812.40
<i>Russell County</i>	\$52,462.08
Russellville	\$109,157.42
Saraland	\$82,852.91
Satsuma	\$19,276.68
Scottsboro	\$228,563.53
Selma	\$88,011.70
Semmes	\$14,006.03
Sheffield	\$49,556.37
<i>Shelby County</i>	\$504,227.10
Sipsey	\$11,573.95
Slocomb	\$15,238.63
Spanish Fort	\$9,802.07
Springville	\$19,897.00
<i>St Clair County</i>	\$319,580.74
Sumiton	\$71,618.11
Summerdale	\$8,433.19
<i>Sumter County</i>	\$36,376.93
Sweet Water	\$92.38
Sylacauga	\$79,513.57
Talladega	\$78,605.13
<i>Talladega County</i>	\$177,688.36
<i>Tallapoosa County</i>	\$59,952.22
Tarrant	\$28,327.67
Thomasville	\$30,467.34
Troy	\$109,447.27
Trussville	\$84,212.39
Tuscaloosa	\$671,546.25
<i>Tuscaloosa County</i>	\$337,602.63
Tuscumbia	\$25,964.42
Tuskegee	\$28,264.31
Union Springs	\$14,107.50
Uniontown	\$5,587.25
Vance	\$2,965.05
Vernon	\$10,922.28

Vestavia Hills	\$106,215.35
Walker County	\$450,669.89
Washington County	\$49,144.60
Weaver	\$13,017.73
West Blocton	\$13,932.35
Wetumpka	\$55,354.63
Wilcox County	\$27,069.41
Winfield	\$58,578.21
Winston County	\$48,007.46
Woodville	\$158.87
Yellow Bluff	\$902.43
Attentus Mouton, LLC d/b/a Lawrence Medical Center (Lawrence County Health Care Authority)	\$33,218.57
Bibb County Healthcare Authority d/b/a Bibb Medical Center	\$125,699.33
Cullman Regional Medical Center, Inc. (Healthcare Authority of Cullman County)	\$105,835.89
Dale County Healthcare Authority d/b/a Dale Medical Center	\$71,713.08
DCH Health Care Authority (Tuscaloosa) (d/b/a DCH Regional Medical Center and Northport Medical Center	\$543,891.34
Decatur Morgan Hospital-Parkway (Health Care Authority of the City of Huntsville)	\$92,702.97
East Alabama Health Care Authority	\$269,611.14
Escambia County Health Care Authority d/b/a D.W. McMillan Memorial Hospital and Atmore Community Hospital	\$37,065.19
Geneva County Health Care Authority d/b/a Wiregrass Medical Center	\$116,835.92
Greene County Health System/Hospital Board	\$74,130.38
Health Care Authority of Clarke County d/b/a Grove Hill Memorial Hospital	\$24,172.95
Health Care Authority of the City of Huntsville d/b/a Huntsville Hospital	\$725,400.76
Health Care Authority of the City of Huntsville d/b/a Huntsville Hospital for Women and Children	\$0.00
Health Care Authority of the City of Huntsville d/b/a Madison Hospital	\$0.00
Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Baptist Medical Center East (Montgomery)	\$167,599.11

Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Baptist Medical Center South (Montgomery)	\$328,752.10
Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Prattville Baptist Hospital	\$62,043.90
HH Health System-Athens Limestone, LLC d/b/a Athens Limestone Hospital (Healthcare Authority of the City of Huntsville)	\$50,986.63
HH Health System-Morgan, LLC d/b/a Decatur Morgan Hospital Decatur	\$288,924.26
HH Health Systems-Shoals LLC d/b/a Hellen Keller Hospital (Healthcare Authority of the City of Huntsville)	\$137,509.41
HH Health Systems-Shoals, LLC d/b/a Red Bay Hospital (Healthcare Authority of the City of Huntsville)	\$19,313.12
Houston County Health Care Authority	\$272,701.24
J Paul Jones Hospital	\$16,223.02
HH Health System-Jackson, LLC d/b/a Highlands Medical Center (Jackson County Health Care Authority)	\$73,389.85
Lakeland Community Hospital HCA Winston County	\$39,482.48
HH Health System-Marshall, LLC d/b/a Marshall Medical Center North (Marshall County Health Care Authority)	\$69,527.23
HH Health System-Marshall, LLC d/b/a Marshall Medical South (Marshall County Health Care Authority)	\$137,509.41
Medical West Hospital Authority (UAB)	\$198,218.18
Monroe County Health Care Authority d/b/a Monroe County Hospital	\$37,065.19
Northeast Alabama Regional Medical Center (Health Care Authority of the City of Anniston)	\$456,579.32
Sylacauga Health Care Authority d/b/a Coosa Valley Medical Center	\$114,418.62
Tombigbee Health Care Authority d/b/a Brian W. Whitfield Memorial Hospital	\$53,986.25
Jefferson County Board of Health	\$1,039,743.64
Mobile County Board of Health	\$683,632.13
Family Oriented Primary Health Clinic	

**Janssen-Alabama
Litigating Local Governments &
Litigating Local Governmental Public Health Entities
Special Master Report**

**I. Total Amount to State and Gross Amounts to Litigating Local Governments and
Litigating Public Health Entities**

Pursuant to §V.B of the *Janssen Alabama State-Wide Opioid Settlement Agreement* (“JASA”), “Janssen shall pay to the State of Alabama the sum of \$70,329,014.38, plus fees and costs... subject to any holdback under subsection V.C. below.” Pursuant to §B.1 of the *McKesson and Janssen Opioid Settlement Allocation Agreement*, “The State, Political Subdivisions [Litigating Local Governments (“LLGs”)] and Litigating Governmental Public Health Entities [“(LGPHE”)] shall divide all Settlement Funds with 50% going to the State, 40% going to the Political Subdivisions [Litigating Local Governments], and 10% going to the Litigating Governmental Public Health Entities.

Therefore, the gross amounts to the State, LLGs, and LGPHE, before considering holdbacks, if applicable, fees, and expenses are as follows:

Gross Settlement Summary before Fees & Expenses	Percentage	Gross Amounts
State of Alabama	50%	\$35,164,507.19
Litigating Local Governments	40%	\$28,131,605.75
Litigating Local Governmental Public Health Entities	10%	\$7,032,901.44
		\$70,329,014.38

II. LLG & LPGHE Administrative & Miscellaneous Fees & Expenses

Pursuant to the *Order Establishing Qualified Settlement Fund and Appointing Receiver for the Fund* (see Doc. 2834) and the *Order Appointing Special Master* (see Doc. 2839), the administrative fees and costs attributable to the LLG and LGPHE portions of the JASA are \$60,000.00. Pursuant §2 of the Appointing Order, \$30,000.00 shall be paid to Special Master

Joseph Tann. In addition, under the ¶8 QSF Order, \$30,000.00 shall be paid to Richard Weinberg of Winbridge Partners for his services as the court-appointed receiver.

III. Attorneys' Fees

A. Attorneys' Fees – Contingency Fees

Section IX.A.1 of the JASA provides for \$5,074,243.46¹ to be paid to the State of Alabama, “to reimburse attorneys’ fees for the State, Participating Litigating Subdivisions, and Special Districts.” Attorneys for the State and LLGs/LGPHEs agreed that this amount will be used to pay attorneys’ fees for the LLGs/LGPHEs, not attorneys’ fees for the State. The allocation/division of the \$5,074,243.46 fee fund was determined by multiplying the percentage of the LLG/LGPHE funds to be received by the client by the applicable contingency fee contract rate, capped at a rate of 25%. In other words, the formula used the lower of: (a) the actual contract rate, or (b) 25%.

However, the amount of compensation available under §IX.A.1 of the JASA, which would have resulted in a cumulative average contingency fee of 12.6% after adding the attorney fee fund payment back to the gross amounts for the LLGs/LGPHEs is insufficient compensation for counsel to the more than 250 LLGs/LLGHEs receiving payments under the JASA who have valid and enforceable contingency fee agreements with their LLG/LGPHE clients ranging from 20% to 40%.

B. Backstop/Deficiency Fund

To address the insufficient compensation afforded to counsel for LLGs/LGPHEs, an additional \$3,670,123.20 was made available from the gross amounts to the LLGs/LGPHEs listed in the chart in Section I above. When added to the \$5,074,243.46 from §IX.A.1 of the JASA, this results in a total gross amount of \$8,744,366.66 to pay contingent fee contracts, after accounting

¹ Pursuant to §2 of the Appointing Order, the Special Master “shall receive a separate payment of \$30,000... for work performed to determine the necessary and appropriate methodology for allocating attorneys’ fees to local government attorneys and Litigating Governmental Public Health Entities attorneys, whether the attorney fees are distributed through an Attorney Fee Fund, a deficiency fund, a backstop fund, or otherwise.” The expense will be taken out of the Attorney Fee Fund (§IX.A.1 of the JASA), before the allocations to counsel are determined.

for administrative expenses. Counsel either has been, or will be, notified by the Special Master, in writing, of the attorney fee award for each of the LLG/LPGHE clients that they represent. Counsel for the LLGs/LGPHEs waived enforcement of their contracts other than in compliance with the terms and conditions contained within this report.

C. Attorneys' Fees - Common Benefit Fund

To compensate the court-appointed Committees for common benefit work (*see* Doc. 2675), the Court ordered that “two percent (2%) of the portion of the Johnson & Johnson and McKesson settlements be allocated to the Alabama local governments, boards of health, and public health authorities that have filed cases in the MDL” be paid into the Committee Fee Fund, as defined by the Court in Doc. 2675. Because all of the participating LLGs either are or were docketed in *MDL 2804 In Re: National Prescription Opioid Litigation*, exactly 2% of the gross amount attributable to LLGs listed in the chart in Section I above is subject to the 2% assessment ($2.000\% \times \$28,131,605.75 = \$562,632.12$). However, nearly half the LGPHE cases, by allocation percentage, either are, or were, pending in state court, so only 1.03% of the gross amount attributable to LGPHEs listed in the chart in Section I above is subject to the 2% assessment ($\sim 1.034\% \times \$7,032,901.44 = \$72,724.29$).

Combined, the total Committee Fee Fund award for the JASA is \$635,356.41. The court-appointed Committee Fee Fund members voluntarily agreed to the division and allocation of the Committee Fee Fund compensation, and the Special Master accepted their agreement.

IV. Payment Amounts to Litigating Local Governments & Litigating Local Governmental Public Health Entities

A. Payments to Litigating Local Governments

Net of all applicable administrative fees and expenses, of the original \$28,131,605.75 gross amount allocated to LLGs², \$24,600,227.10 (87.45%) is available to pay LLGs. The methodology for awarding the \$24,600,227.10 to LLGs is substantially similar to the methodology used in MDL 2804. At the county level, the model incorporates the following factors:

1. The number of persons suffering from opioid use disorder in the county.
2. The number of overdose deaths that occurred in the county.
3. The amount of opioids distributed within the county by Morphine Milligram Equivalent

For Cities/Towns, the formula draws on US Census Bureau data on local government spending by function. The functions or expenditure categories examined for each jurisdiction were: elementary and secondary education net of capital outlay, public welfare (including child protective services), hospitals net of capital outlay, health, police protection, fire protection, corrections net of capital outlay, housing and community development, and judicial and legal.

All Alabama Litigating Local Governments participating in the JASA were assigned an allocation amount using the allocation model referenced above and the \$24,600,227.10 for LLGs is hereby allocated as set forth in the attached Exhibit A. If an LLG wishes to object to an allocation amount, it must do so **no later than 5:00 pm CDT on November 21, 2022, at which time all LLG allocations will become final.**

² This calculation excludes the attorneys' fees paid pursuant to §IX.A.1 of the JASA, because those funds were never available for distribution to LLGs/LGPHEs.

B. Payments to Local Governmental Public Health Entities

Net of all applicable administrative fees and expenses, of the original \$7,032,901.44 gross amount allocated to LGPHEs³, \$6,198,900.40 (88.14%) is available to pay LGPHEs. The allocation percentages for payments to LGPHEs were determined by an arbitration proceeding that was conducted by the Honorable Sally Shushan, a retired federal magistrate judge for the United States District Court for the Eastern District of Louisiana. The final allocation percentages for LGPHEs are attached hereto as Exhibit B. The LGPHE allocations are final and are not subject to further dispute or objection.

Local Government Summary Chart

Description	Amount	Classified	Percentage
Payable to LLGs	\$24,600,227.10	\$30,799,027.58	76.5%
Payable to LGPHEs	\$6,198,800.48		
Payable to Attorney Fee Fund (LLGs)	\$4,035,394.77	\$6,956,141.30	17.3%
Payable to Backstop/Deficiency Fund (LLGs)	\$2,920,746.53		
Payable to Attorney Fee Fund (LGPHEs)	\$1,008,848.69	\$1,758,225.36	4.4%
Payable to Backstop/Deficiency Fund (LGPHEs)	\$749,376.67		
Payable to Common Benefit	\$635,356.41	\$635,356.41	1.6%
Payable to Admin/Misc. Expenses	\$90,000.00	\$90,000.00	0.2%
TOTAL	\$40,238,750.65	\$40,238,750.65	100.0%

IT IS SO ORDERED

SPECIAL MASTER

Joseph C. Tann, ESQ

³ This calculation excludes the attorneys' fees paid pursuant to §IX.A.1 of the JASA, because those funds were never available for distribution to LLGs/LGPHEs.

**Exhibit A
LLG Allocations**

**Janssen-Alabama
Litigating Local Governments &
Litigating Local Governmental Public Health Entities
Special Master Report**

\$24,600,227.10

Litigating Local Government	Net Allocation to Subdivision
Abbeville	\$16,549.17
Alabaster	\$156,786.01
Albertville	\$92,622.45
Alexander City	\$95,543.47
Anniston	\$246,703.76
Arab	\$59,286.10
Argo	\$7,373.58
Ashland	\$12,023.06
Ashville	\$5,541.30
Athens	\$107,741.88
Attalla	\$50,672.07
Auburn	\$152,084.86
<i>Autauga County</i>	\$77,602.80
<i>Baldwin County</i>	\$452,818.80
<i>Barbour County</i>	\$22,412.55
Bay Minette	\$38,849.99
Berry	\$6,345.80
Bessemer	\$180,615.73
<i>Bibb County</i>	\$101,343.37
Birmingham	\$1,288,762.75
<i>Blount County</i>	\$229,077.93
Boaz	\$51,105.61
Brent	\$19,197.97
Brewton	\$68,160.06
Bridgeport	\$465.99
Brookwood	\$2,145.55
Brundidge	\$3,356.67
<i>Bullock County</i>	\$19,769.00
Butler	\$25,265.38
<i>Butler County</i>	\$16,550.24
Calera	\$74,902.34
<i>Calhoun County</i>	\$224,846.86
Camp Hill	\$1,870.86

Exhibit A
LLG Allocations

Carbon Hill	\$28,722.43
Cedar Bluff	\$17,636.07
Center Point	\$3,305.23
Centre	\$44,505.70
Centreville	\$7,058.08
Chambers County	\$131,344.12
Cherokee	\$2,579.36
Cherokee County	\$93,858.70
Chickasaw	\$24,839.72
Childersburg	\$29,794.26
Chilton County	\$202,763.10
Choctaw County	\$38,731.02
Clanton	\$51,987.21
Clarke County	\$73,956.05
Clay County	\$50,998.11
Cleburne County	\$63,185.29
Cleveland	\$3,926.26
Coffee County	\$96,028.01
Colbert County	\$98,059.58
Columbiana	\$15,420.21
Conecuh County	\$47,570.32
Coosa County	\$37,509.05
Cordova	\$29,453.65
Covington County	\$140,728.69
Crenshaw County	\$44,278.13
Cullman	\$165,685.59
Cullman County	\$276,204.00
Dadeville	\$7,448.16
Dale County	\$74,906.03
Daleville	\$23,877.29
Dallas County	\$63,703.47
Daphne	\$98,956.19
Dauphin Island	\$14,205.36
De Kalb County	\$123,378.62
Decatur	\$580,158.10
Demopolis	\$45,070.49
Dora	\$28,459.17
Dothan	\$335,804.06
Double Springs	\$24,716.90
Douglas	\$299.60

Exhibit A
LLG Allocations

East Brewton	\$8,182.63
<i>Elmore County</i>	\$171,381.18
Enterprise	\$102,392.62
<i>Escambia County</i>	\$200,696.94
<i>Etowah County</i>	\$316,696.89
Eufaula	\$65,476.72
Evergreen	\$12,766.38
Fairfield	\$36,032.11
Fairhope	\$68,768.24
Faunsdale	\$84.90
<i>Fayette County</i>	\$42,739.55
Fayette	\$24,277.50
Florence	\$274,645.46
Foley	\$105,927.35
Fort Deposit	\$1,589.45
Fort Payne	\$179,281.91
<i>Franklin County</i>	\$88,724.29
Fultondale	\$29,353.16
Gadsden	\$257,640.61
Geneva	\$20,447.57
<i>Geneva County</i>	\$67,970.36
Georgiana	\$5,646.66
Geraldine	\$3,391.55
Gilbertown	\$620.79
Grant	\$5,243.07
Graysville	\$11,345.66
<i>Greene County</i>	\$21,724.43
Greensboro	\$7,686.26
Greenville	\$52,709.99
Guin	\$7,808.71
Gulf Shores	\$150,253.65
Guntersville	\$78,286.42
Gurley	\$2,315.07
<i>Hale County</i>	\$40,622.24
Haleyville	\$43,919.34
Hamilton	\$27,818.56
Hammondville	\$1,510.11
Hartselle	\$19,583.57
Headland	\$19,338.34
Helena	\$42,935.27

Exhibit A
LLG Allocations

Henagar	\$10,570.76
Henry County	\$25,053.95
Homewood	\$123,207.69
Hoover	\$436,822.98
Houston County	\$172,076.05
Hueytown	\$59,887.97
Huntsville	\$982,235.42
Irondale	\$53,479.73
Jackson County	\$48,687.34
Jacksonville	\$77,027.47
Jasper	\$434,211.78
Jefferson County	\$1,696,349.99
Killen	\$5,645.96
Lamar County	\$50,142.11
Lanett	\$39,423.08
Lauderdale County	\$147,401.34
Lawrence County	\$139,697.71
Leeds	\$46,175.01
Leesburg	\$5,909.48
Leighton	\$1,739.22
Level Plains	\$1,079.80
Limestone County	\$179,215.72
Lincoln	\$56,874.17
Linden	\$5,291.31
Locust Fork	\$1,203.67
Louisville	\$1,426.55
Lowndes County	\$21,379.00
Loxley	\$12,668.69
Luverne	\$4,719.19
Macon County	\$42,033.61
Madison County	\$404,201.48
Madison	\$145,026.61
Marengo County	\$15,338.19
Marion	\$7,253.92
Marion County	\$68,672.13
Marshall County	\$228,414.30
McKenzie	\$1,356.86
Midfield	\$119.88
Millbrook	\$76,240.40
Mobile	\$994,060.76

Exhibit A
LLG Allocations

<i>Mobile County</i>	\$850,120.00
<i>Monroe County</i>	\$57,981.56
Monroeville	\$32,707.10
Montgomery	\$547,380.25
<i>Montgomery County</i>	\$301,933.10
Moody	\$11,151.44
<i>Morgan County</i>	\$96,628.31
Moulton	\$41,720.61
Mountain Brook	\$109,808.89
Munford	\$7,446.87
Muscle Shoals	\$82,627.69
Nauvoo	\$5,760.99
New Hope	\$4,028.23
Northport	\$130,639.09
Oakman	\$12,904.29
Oneonta	\$83,282.45
Opelika	\$165,262.57
Opp	\$28,536.18
Orange Beach	\$90,600.60
Oxford	\$108,529.23
Ozark	\$90,855.35
Parrish	\$35,992.50
Pelham	\$211,706.96
Pell City	\$136,880.34
<i>Perry County</i>	\$15,670.22
Phenix City	\$192,784.61
<i>Pickens County</i>	\$88,275.86
Piedmont	\$44,192.61
<i>Pike County</i>	\$9,152.18
Pleasant Grove	\$15,918.17
Powell	\$1,633.88
Prattville	\$185,814.68
Priceville	\$3,750.36
Prichard	\$33,890.72
Ragland	\$4,680.84
Rainbow City	\$41,455.84
Rainsville	\$57,953.47
<i>Randolph County</i>	\$54,662.44
Red Bay	\$19,325.28
Roanoke	\$33,595.84

Exhibit A
LLG Allocations

Robertsdale	\$26,377.70
Rockford	\$1,812.82
<i>Russell County</i>	\$52,474.14
Russellville	\$97,602.38
Saraland	\$76,529.28
Satsuma	\$19,281.12
Scottsboro	\$204,368.55
Selma	\$81,294.34
Semmes	\$12,937.03
Sheffield	\$49,567.77
<i>Shelby County</i>	\$504,343.03
Sipsey	\$11,576.61
Slocomb	\$13,625.52
Spanish Fort	\$9,053.94
Springville	\$17,805.58
<i>St Clair County</i>	\$319,654.22
Sumiton	\$71,634.58
Summerdale	\$7,546.76
<i>Sumter County</i>	\$36,385.30
Sweet Water	\$92.40
Sylacauga	\$71,096.54
Talladega	\$70,284.27
<i>Talladega County</i>	\$158,878.87
<i>Tallapoosa County</i>	\$59,966.01
Tarrant	\$28,334.18
Thomasville	\$27,264.84
Troy	\$101,093.87
Trussville	\$75,297.94
Tuscaloosa	\$600,958.31
<i>Tuscaloosa County</i>	\$311,835.57
Tuscumbia	\$25,970.39
Tuskegee	\$28,270.81
Union Springs	\$13,030.78
Uniontown	\$5,588.53
Vance	\$2,965.74
Vernon	\$9,766.07
Vestavia Hills	\$94,971.75
<i>Walker County</i>	\$450,773.51
<i>Washington County</i>	\$49,692.32
Weaver	\$13,020.72

Exhibit A
LLG Allocations

West Blocton	\$12,457.51
Wetumpka	\$51,129.76
<i>Wilcox County</i>	\$27,075.63
Winfield	\$58,591.68
Woodville	\$142.07
Yellow Bluff	\$902.64

Exhibit B
LGPHE Allocations
Janssen-Alabama
Litigating Local Governments &
Litigating Local Governmental Public Health Entities
Special Master Report

\$6,198,800.48

Litigating Governmental Public Health Entities	Net Allocation to LGPHE
Bibb County Healthcare Authority d/b/a Bibb Medical Center	\$161,658.60
Dale County Healthcare Authority d/b/a Dale Medical Center	\$92,228.31
DCH Health Care Authority (Tuscaloosa) (d/b/a DCH Regional Medical Center and Northport Medical Center	\$627,981.50
Escambia County Health Care Authority d/b/a D.W. McMillan Memorial Hospital and Atmore Community Hospital	\$47,668.56
Geneva County Health Care Authority d/b/a Wiregrass Medical Center	\$150,259.60
Health Care Authority of Clarke County d/b/a Grove Hill Memorial Hospital	\$31,088.19
Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Baptist Medical Center East (Montgomery)	\$190,674.25
Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Baptist Medical Center South (Montgomery)	\$401,037.69
Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Prattville Baptist Hospital	\$56,995.02
Lakeland Community Hospital HCA Winston County	\$60,103.84
Medical West Hospital Authority (UAB)	\$256,995.73
Monroe County Health Care Authority d/b/a Monroe County Hospital	\$50,777.38
Sylacauga Health Care Authority d/b/a Coosa Valley Medical Center	\$147,150.78
Greene County Health System	\$95,337.12
Tombigbee Health Care Authority d/b/a Brian W. Whitfield Memorial Hospital	\$63,212.66
Attentus Mouton, LLC d/b/a Lawrence Medical Center (Lawrence County Health Care Authority)	\$43,560.36
Cullman Regional Medical Center, Inc. (Healthcare Authority of Cullman County)	\$134,733.19

Exhibit B
LGPHE Allocations

Decatur Morgan Hospital-Parkway (Health Care Authority of the City of Huntsville)	\$121,563.78
Health Care Authority of the City of Huntsville d/b/a Huntsville Hospital	\$934,015.06
HH Health System-Athens Limestone, LLC d/b/a Athens Limestone Hospital (Healthcare Authority of the City of Huntsville)	\$66,860.08
HH Health System-Morgan, LLC d/b/a Decatur Morgan Hospital Decatur	\$334,300.40
HH Health Systems-Shoals LLC d/b/a Hellen Keller Hospital (Healthcare Authority of the City of Huntsville)	\$174,241.42
HH Health Systems-Shoals, LLC d/b/a Red Bay Hospital (Healthcare Authority of the City of Huntsville)	\$25,325.79
Jackson County Healthcare Authority	\$96,237.99
Marshall County Health Care Authority	\$91,172.84
Marshall County Health Care Authority	\$197,541.15
Jefferson County Board of Health	\$950,284.34
Mobile County Board of Health	\$595,794.85



IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

THE STATE OF ALABAMA,
Plaintiff,

V.

ENDO HEALTH SOLUTIONS, INC.,
ENDO PHARMACEUTICALS, INC.,
MCKESSON CORPORATION,
PURDUE PHARMA INC. ET AL,
Defendants.

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(Case No.: CV-2019-901174.00
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SUBMISSION OF SPECIAL MASTER REPORT

COMES NOW the Local Government Executive Committee and submits the McKesson-
Alabama Litigating Local Governments & Litigating Local Governmental Public Health Entities
Special Master Report attached hereto.

/s/ Christina D. Crow

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been filed through the appellate court electronic filing system and that I have served a copy of same on all counsel of record by e-mail and, where appropriate, a copy of same has been deposited in the U.S. Mail, properly addressed and postage prepaid, on this date for service on the counsel as required by law.

/s/Christina D. Crow
OF COUNSEL

**McKesson-Alabama
Litigating Local Governments &
Litigating Local Governmental Public Health Entities
Special Master Report**

**I. Total Amount to State and Gross Amounts to Litigating Local Governments and
Litigating Public Health Entities**

Pursuant to Exhibit H of the *McKesson Alabama Settlement Agreement* (“MASA”), McKesson shall pay a total of \$141,000,000 in Compensatory Restitution Amount to the State of Alabama. Pursuant to §B.1 of the *McKesson and Janssen Opioid Settlement Allocation Agreement*, “The State, Political Subdivisions [Litigating Local Governments (“LLGs”)] and Litigating Governmental Public Health Entities [(“LGPHE”)] shall divide all Settlement Funds with 50% going to the State, 40% going to the Political Subdivisions [Litigating Local Governments], and 10% going to the Litigating Governmental Public Health Entities.

Therefore, the gross amounts to the State, LLGs, and LGPHE, before considering holdbacks, if applicable, fees, and expenses are as follows:

Gross Settlement Summary before Fees & Expenses	Percentage	Gross Amounts
State of Alabama	50%	\$71,500,000.00
Litigating Local Governments	40%	\$56,400,000.00
Litigating Local Governmental Public Health Entities	10%	\$14,100,000.00
		\$141,000,000.00

II. LLG & LPGHE Administrative & Miscellaneous Fees & Expenses

Pursuant to the *Order Establishing Qualified Settlement Fund and Appointing Receiver for the Fund* (see Doc. 2834) and the *Order Appointing Special Master* (see Doc. 2839), the administrative fees and costs attributable to the LLG and LGPHE portions of the MASA are \$60,000.00. Pursuant §2 of the Appointing Order, \$30,000.00 shall be paid to Special Master

Joseph Tann. In addition, under the ¶8 QSF Order, \$30,000.00 shall be paid to Richard Weinberg of Winbridge Partners for his services as the court-appointed receiver.

III. Attorneys' Fees

A. Attorneys' Fees – Contingency Fees

In addition to the Compensatory Restitution Amount listed in Section I above, §VII of the MASA provides for \$11,000,000.00¹ to be paid “for Subdivision counsel... for fees and costs...” Pursuant to Exhibit H.§.B.c of the MASA, the \$11,000,000 award for subdivision fees and costs is “to be paid in two equal installments over two years, beginning in 2022”. The allocation/division of the \$11,000,000 fee fund was determined by multiplying the percentage of the LLG/LGPHE funds to be received by the client by the applicable contingency fee contract rate, capped at a rate of 25%. In other words, the formula used the lower of: (a) the actual contract rate, or (b) 25%. Consistent with the allocation to LLGs/LGPHEs, 80% of the Subdivision counsel fee fund is being awarded to counsel for the LLGs and 20% of the Subdivision counsel fee fund is being awarded to counsel for the LGPHEs.

However, the amount of compensation available under §VII of the MASA, which would have resulted in a cumulative average contingency fee of ~13.5% of the gross amounts for the LLGs/LGPHEs, after adding the attorney fee fund payment, is insufficient compensation for counsel to the more than 250 LLGs/LLGHEs receiving payments under the MASA who have valid and enforceable contingency fee agreements with their LLG/LGPHE clients ranging from 20% to 40%.

¹ Pursuant to §2 of the Appointing Order, “the Special Master shall receive a separate payment of \$30,000... for work performed to determine the necessary and appropriate methodology for allocating attorneys’ fees to local government attorneys and Litigating Governmental Public Health Entities attorneys, whether the attorney fees are distributed through an Attorney Fee Fund, a deficiency fund, a backstop fund, or otherwise.” The expense will be taken out of the Attorney Fee Fund (§VII of the MASA), before the allocations to counsel are determined.

B. Backstop/Deficiency Fund

To address the insufficient compensation afforded to counsel for LLGs/LGPHEs, an additional \$6,471,106.48 is being made available from the gross amounts to the LLGs/LGPHEs listed in the chart in Section I above. When added to the \$11,000,000.00 from §VII of the MASA, this results in a total gross amount of \$17,441,106.48 to pay contingent fee contracts, after accounting for administrative expenses. Counsel either has been, or will be, notified by the Special Master, in writing, of the attorney fee award for each of the LLG/LPGHE clients that they represent. Counsel for the LLGs/LGPHEs waived enforcement of their contracts other than in compliance with the terms and conditions contained within this report.

C. Attorneys' Fees - Common Benefit Fund

To compensate the court-appointed Committees for common benefit work (*see* Doc. 2675), the Court ordered that “two percent (2%) of the portion of the Johnson & Johnson and McKesson settlements be allocated to the Alabama local governments, boards of health, and public health authorities that have filed cases in the MDL” be paid into the Committee Fee Fund, as defined by the Court in Doc. 2675. Because all of the participating LLGs either are or were docketed in *MDL 2804 In Re: National Prescription Opioid Litigation*, exactly 2% of the gross amount attributable to LLGs listed in the chart in Section I above is subject to the 2% assessment ($2.000\% \times \$56,400,000.00 = \$1,128,000.00$). However, nearly half the LGPHE cases, by allocation percentage, either are, or were, pending in state court, so only ~1.05% of the gross amount attributable to LGPHEs listed in the chart in Section I above is subject to the 2% assessment ($\sim 1.049\% \times \$14,100,000 = \$147,914.30$).

Combined, the total Committee Fee Fund award for the MASA is \$1,275,914.30. The court-appointed Committee Fee Fund members voluntarily agreed to the division and allocation of the Committee Fee Fund compensation, and the Special Master accepted their agreement.

IV. Payment Amounts to Litigating Local Governments & Litigating Local Governmental Public Health Entities²

A. Payments to Litigating Local Governments

The net of all applicable administrative fees and expenses, of the original \$56,400,000.00 gross amount allocated to LLGs³, \$50,058,163.68 (88.76%) is available to pay LLGs. The methodology for awarding the \$50,058,163.68 to LLGs is substantially similar to the methodology used in MDL 2804. At the county level, the model incorporates the following factors:

1. The number of persons suffering from opioid use disorder in the county.
2. The number of overdose deaths that occurred in the county.
3. The amount of opioids distributed within the county by Morphine Milligram Equivalent

For Cities/Towns, the formula draws on US Census Bureau data on local government spending by function. The functions or expenditure categories examined for each jurisdiction were: elementary and secondary education net of capital outlay, public welfare (including child protective services), hospitals net of capital outlay, health, police protection, fire protection, corrections net of capital outlay, housing and community development, and judicial and legal.

All Alabama Litigating Local Governments participating in the MASA were assigned an allocation amount using the allocation model referenced above and the \$50,058,163.68 for LLGs is hereby allocated as set forth in the attached Exhibit A. If an LLG wishes to object to an allocation

² Consistent with the terms and conditions of the Final Arbitration Award set for in Exhibit H of the MASA, payments to LLGs/LGPHEs will be made over a period of ten (10) years.

³ This calculation excludes the attorneys' fees paid pursuant to §VII of the MASA, because those funds were never available for distribution to LLGs/LGPHEs.

amount, it must do so **no later than 5:00 pm CDT on November 18, 2022, at which time all LLG allocations will become final.**

B. Payments to Local Governmental Public Health Entities

Net of all applicable administrative fees and expenses, of the original \$14,100,000.00 gross amount allocated to LGPHEs⁴, \$12,610,153.24 (89.43%) is available to pay LGPHEs. The allocation percentages for payments to LGPHEs were determined by an arbitration proceeding that was conducted by the Honorable Sally Shushan, a retired federal magistrate judge for the United States District Court for the Eastern District of Louisiana. The final allocation percentages for LGPHEs are attached hereto as Exhibit B. The LGPHE allocations are final and are not subject to further dispute or objection.

Local Government Summary Chart - McKesson

Description	Amount	Classified	Percentage
Payable to LLGs	\$50,058,163.68	\$62,668,316.92	76.9%
Payable to LGPHEs	\$12,610,153.24		
Payable to Attorney Fee Fund (LLGs)	\$8,776,000.00	\$13,922,106.48	17.1%
Payable to Backstop/Deficiency Fund (LLGs)	\$5,146,106.48		
Payable to Attorney Fee Fund (LGPHEs)	\$2,194,000.00	\$3,519,000.00	4.3%
Payable to Backstop/Deficiency Fund (LGPHEs)	\$1,325,000.00		
Payable to Common Benefit	\$1,275,914.30	\$1,275,914.30	1.6%
Payable to Admin/Misc. Expenses	\$114,662.30	\$114,662.30	0.1%
TOTAL	\$81,500,000.00	\$81,500,000.00	100.0%

IT IS SO ORDERED

SPECIAL MASTER

Joseph C. Tann, ESQ

⁴ This calculation excludes the attorneys' fees paid pursuant to §VII of the MASA, because those funds were never available for distribution to LLGs/LGPHEs.

Exhibit A
Litigating Local Government Allocations

McKesson-Alabama
Litigating Local Governments &
Litigating Local Governmental Public Health Entities
Special Master Report

\$50,058,163.68

Litigating Local Government	Net Allocation to Subdivision
Abbeville	\$33,681.27
Alabaster	\$318,088.73
Albertville	\$188,507.44
Alexander City	\$194,452.35
Anniston	\$502,097.41
Arab	\$120,660.49
Argo	\$15,006.89
Ashland	\$24,469.62
Ashville	\$11,277.79
Athens	\$219,278.86
Attalla	\$103,129.02
Auburn	\$309,526.76
<i>Autauga County</i>	\$157,939.08
<i>Baldwin County</i>	\$921,587.68
<i>Barbour County</i>	\$45,614.55
Bay Minette	\$79,068.43
Berry	\$12,915.12
Bessemer	\$366,434.66
<i>Bibb County</i>	\$206,256.46
Birmingham	\$2,622,920.87
<i>Blount County</i>	\$466,224.91
Boaz	\$104,011.36
Brent	\$39,072.16
Brewton	\$138,720.98
Bridgeport	\$948.39
Brookwood	\$4,366.67
Brundidge	\$6,831.57
<i>Bullock County</i>	\$40,234.34
Butler	\$51,420.71
<i>Butler County</i>	\$33,683.45
Calera	\$152,443.03
<i>Calhoun County</i>	\$457,613.73

Exhibit A
Litigating Local Government Allocations

Camp Hill	\$3,807.62
Carbon Hill	\$58,456.57
Cedar Bluff	\$35,893.36
Center Point	\$6,726.89
Centre	\$90,579.07
Centreville	\$14,364.78
<i>Chambers County</i>	\$267,314.70
Cherokee	\$5,249.57
<i>Cherokee County</i>	\$191,023.47
Chickasaw	\$50,554.40
Childersburg	\$60,637.99
<i>Chilton County</i>	\$412,668.33
<i>Choctaw County</i>	\$78,826.30
Clanton	\$105,805.61
<i>Clarke County</i>	\$150,517.12
<i>Clay County</i>	\$103,792.59
<i>Cleburne County</i>	\$128,596.22
Cleveland	\$7,990.82
<i>Coffee County</i>	\$195,438.50
<i>Colbert County</i>	\$199,573.22
Columbiana	\$31,383.58
<i>Conecuh County</i>	\$96,816.25
<i>Coosa County</i>	\$76,339.31
Cordova	\$59,944.78
<i>Covington County</i>	\$286,414.40
<i>Crenshaw County</i>	\$90,115.92
Cullman	\$337,207.28
<i>Cullman County</i>	\$562,137.01
Dadeville	\$15,158.67
<i>Dale County</i>	\$152,450.55
Daleville	\$48,595.64
<i>Dallas County</i>	\$129,650.84
Daphne	\$201,398.02
Dauphin Island	\$28,911.09
<i>De Kalb County</i>	\$251,103.12
Decatur	\$1,180,751.68
Demopolis	\$91,728.55
Dora	\$57,920.79
Dothan	\$683,436.49
Double Springs	\$50,304.44

Exhibit A
Litigating Local Government Allocations

Douglas	\$609.74
East Brewton	\$16,653.48
<i>Elmore County</i>	\$348,799.09
Enterprise	\$208,391.93
<i>Escambia County</i>	\$408,463.23
<i>Etowah County</i>	\$644,549.11
Eufaula	\$133,259.79
Evergreen	\$25,982.44
Fairfield	\$73,333.42
Fairhope	\$139,958.78
Faunsdale	\$172.79
<i>Fayette County</i>	\$86,984.56
Fayette	\$49,410.14
Florence	\$557,202.94
Foley	\$215,585.89
Fort Deposit	\$3,234.88
Fort Payne	\$364,878.85
<i>Franklin County</i>	\$180,573.80
Fultondale	\$59,740.25
Gadsden	\$524,356.36
Geneva	\$41,615.38
<i>Geneva County</i>	\$138,334.91
Georgiana	\$11,492.21
Geraldine	\$6,902.57
Gilbertown	\$1,263.46
Grant	\$10,670.81
Graysville	\$23,090.95
<i>Greene County</i>	\$44,214.08
Greensboro	\$15,643.27
Greenville	\$107,276.64
Guin	\$15,892.48
Gulf Shores	\$305,799.83
Guntersville	\$159,330.41
Gurley	\$4,711.69
<i>Hale County</i>	\$82,675.36
Haleyville	\$89,385.70
Hamilton	\$56,617.01
Hammondville	\$3,073.41
Hartselle	\$39,856.95
Headland	\$39,357.86

Exhibit A
Litigating Local Government Allocations

Helena	\$87,382.89
Henagar	\$21,513.86
<i>Henry County</i>	\$50,990.40
Homewood	\$249,964.75
Hoover	\$886,229.99
<i>Houston County</i>	\$350,213.30
Hueytown	\$121,885.44
Huntsville	\$1,999,069.10
Irondale	\$108,500.12
<i>Jackson County</i>	\$99,089.64
Jacksonville	\$156,768.15
Jasper	\$883,718.23
<i>Jefferson County</i>	\$3,452,452.21
Killen	\$11,490.78
<i>Lamar County</i>	\$102,050.42
Lanett	\$80,234.80
<i>Lauderdale County</i>	\$299,049.03
<i>Lawrence County</i>	\$284,316.13
Leeds	\$93,976.49
Leesburg	\$12,027.11
Leighton	\$3,539.70
Level Plains	\$2,197.64
<i>Limestone County</i>	\$364,744.14
Lincoln	\$115,751.67
Linden	\$10,769.00
Locust Fork	\$2,449.74
Louisville	\$2,903.36
<i>Lowndes County</i>	\$43,511.06
Loxley	\$25,783.61
Luverne	\$9,604.60
<i>Macon County</i>	\$85,547.80
<i>Madison County</i>	\$822,640.56
Madison	\$295,161.63
<i>Marengo County</i>	\$31,216.65
Marion	\$14,763.34
<i>Marion County</i>	\$139,763.16
<i>Marshall County</i>	\$464,874.26
McKenzie	\$2,761.52
Midfield	\$243.98
Millbrook	\$155,166.28

Exhibit A
Litigating Local Government Allocations

Mobile	\$2,023,136.31
Mobile County	\$1,730,184.63
Monroe County	\$118,005.47
Monroeville	\$66,566.28
Montgomery	\$1,114,041.43
Montgomery County	\$614,501.48
Moody	\$22,695.67
Morgan County	\$196,660.25
Moulton	\$84,910.79
Mountain Brook	\$223,485.69
Munford	\$15,156.05
Muscle Shoals	\$168,165.85
Nauvoo	\$11,724.91
New Hope	\$8,198.36
Northport	\$265,879.80
Oakman	\$26,263.11
Oneonta	\$169,498.45
Opelika	\$336,346.35
Opp	\$58,077.51
Orange Beach	\$184,392.51
Oxford	\$220,881.29
Ozark	\$184,910.99
Parrish	\$73,252.80
Pelham	\$430,871.08
Pell City	\$278,582.16
Perry County	\$31,892.41
Phenix City	\$392,359.87
Pickens County	\$179,661.15
Piedmont	\$89,941.86
Pike County	\$18,626.73
Pleasant Grove	\$32,397.04
Powell	\$3,325.31
Prattville	\$378,174.49
Priceville	\$7,632.82
Prichard	\$68,975.21
Ragland	\$9,526.56
Rainbow City	\$84,371.93
Rainsville	\$117,948.28
Randolph County	\$111,250.32
Red Bay	\$39,331.27

Exhibit A
Litigating Local Government Allocations

Roanoke	\$68,375.05
Robertsdale	\$53,684.52
Rockford	\$3,689.49
<i>Russell County</i>	\$106,796.63
Russellville	\$198,642.71
Saraland	\$155,754.22
Satsuma	\$39,241.39
Scottsboro	\$415,935.78
Selma	\$165,452.18
Semmes	\$26,329.76
Sheffield	\$100,881.51
<i>Shelby County</i>	\$1,026,451.04
Sipsey	\$23,561.00
Slocumb	\$27,730.98
Spanish Fort	\$18,426.79
Springville	\$36,238.34
<i>St Clair County</i>	\$650,567.95
Sumiton	\$145,792.41
Summerdale	\$15,359.36
<i>Sumter County</i>	\$74,052.23
Sweet Water	\$188.06
Sylacauga	\$144,697.39
Talladega	\$143,044.23
<i>Talladega County</i>	\$323,354.10
<i>Tallapoosa County</i>	\$122,044.26
Tarrant	\$57,666.40
Thomasville	\$55,490.05
Troy	\$205,748.66
Trussville	\$153,248.16
Tuscaloosa	\$1,223,084.77
<i>Tuscaloosa County</i>	\$634,655.24
Tuscumbia	\$52,855.57
Tuskegee	\$57,537.42
Union Springs	\$26,520.55
Uniontown	\$11,373.92
Vance	\$6,035.94
Vernon	\$19,876.14
Vestavia Hills	\$193,288.79
<i>Walker County</i>	\$917,425.07
<i>Washington County</i>	\$101,135.00

Exhibit A
Litigating Local Government Allocations

Weaver	\$26,500.09
West Blocton	\$25,353.82
Wetumpka	\$104,060.52
<i>Wilcox County</i>	\$55,104.98
Winfield	\$119,247.20
Woodville	\$289.14
Yellow Bluff	\$1,837.07

Exhibit B
Litigating Governmental Public Health Entities Allocations

McKesson-Alabama
Litigating Local Governments &
Litigating Governmental Public Health Entities
Special Master Report

\$12,610,153.24

Litigating Governmental Public Health Entities	Net Allocation to Special District
Bibb County Healthcare Authority d/b/a Bibb Medical Center	\$335,663.12
Dale County Healthcare Authority d/b/a Dale Medical Center	\$191,500.11
DCH Health Care Authority (Tuscaloosa) (d/b/a DCH Regional Medical Center and Northport Medical Center	\$1,303,922.13
Escambia County Health Care Authority d/b/a D.W. McMillan Memorial Hospital and Atmore Community Hospital	\$98,977.59
Geneva County Health Care Authority d/b/a Wiregrass Medical Center	\$311,994.57
Health Care Authority of Clarke County d/b/a Grove Hill Memorial Hospital	\$64,550.60
Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Baptist Medical Center East (Montgomery)	\$395,910.35
Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Baptist Medical Center South (Montgomery)	\$832,702.74
Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Prattville Baptist Hospital	\$118,342.77
Lakeland Community Hospital HCA Winston County	\$124,797.83
Medical West Hospital Authority (UAB)	\$533,618.30
Monroe County Health Care Authority d/b/a Monroe County Hospital	\$105,432.65
Sylacauga Health Care Authority d/b/a Coosa Valley Medical Center	\$305,539.51
Greene County Health System	N/A
Tombigbee Health Care Authority d/b/a Brian W. Whitfield Memorial Hospital	\$131,252.89
Attentus Mouton, LLC d/b/a Lawrence Medical Center (Lawrence County Health Care Authority)	\$90,477.44
Cullman Regional Medical Center, Inc. (Healthcare Authority of Cullman County)	\$279,848.83
Decatur Morgan Hospital-Parkway (Health Care Authority of the City of Huntsville)	\$252,495.18

Exhibit B
Litigating Governmental Public Health Entities Allocations

Health Care Authority of the City of Huntsville d/b/a Huntsville Hospital	\$1,940,004.66
HH Health System-Athens Limestone, LLC d/b/a Athens Limestone Hospital (Healthcare Authority of the City of Huntsville)	\$138,872.35
HH Health System-Morgan, LLC d/b/a Decatur Morgan Hospital Decatur	\$694,361.75
HH Health Systems-Shoals LLC d/b/a Hellen Keller Hospital (Healthcare Authority of the City of Huntsville)	\$361,909.76
HH Health Systems-Shoals, LLC d/b/a Red Bay Hospital (Healthcare Authority of the City of Huntsville)	\$52,603.16
Jackson County Healthcare Authority	\$199,892.02
Marshall County Health Care Authority	\$189,371.39
Marshall County Health Care Authority	\$410,304.67
Jefferson County Board of Health	\$1,933,790.47
Mobile County Board of Health/Family Oriented PHC	\$1,212,016.42



IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

THE STATE OF ALABAMA,	)	
	)	
Plaintiff,	)	
	)	
-vs-	)	CASE NO. CV-2019-901174.0
	)	
ENDO HEALTH SOLUTIONS, INC.,	)	
et al.,	)	
	)	
Defendants.	)	

SUBMISSION OF SPECIAL MASTER REPORT

COMES NOW the Local Government Executive Committee and submits the Teva
Pharmaceutical Industries, Ltd. Alabama Political Subdivisions and Government Public Health
Entities Special Master Report attached hereto.

/s/ Christina D. Crow

Christina D. Crow (ASB-0637-C58C)
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Birmingham, AL 35209
(205) 879-5000
kj@rileyjacksonlaw.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been filed through the court electronic filing system and that where appropriate, I have served a copy of same has been deposited in the U.S. Mail, properly addressed and postage prepaid, on this date for service on the counsel as required by law.

/s/Christina D. Crow
OF COUNSEL

**Teva-Alabama
Political Subdivision & Governmental Public Health Entity
Special Master Report**

I. Total Gross Amount to the State of Alabama, Political Subdivisions, and Governmental Public Health Entities

In 2023, Teva Pharmaceutical Industries Ltd. (“Teva”) and its respective past and present direct or indirect parents, subsidiaries, divisions, affiliates, joint ventures, predecessors, successors, and assigns entered into a global settlement with various states and political subdivisions. Teva agreed to pay up to \$3.34 billion over 13 years and to provide either \$1.2 billion of its generic version of the drug Narcan over ten years or \$240 million of cash instead of product, as each state may elect.¹ The State of Alabama (“the State”) and all relevant Alabama Political Subdivisions and Governmental Public Health Entities (collectively, “Local Governments”) are participating in the Teva Settlement Agreement.

According to reports provided to the Special Master by the national Directing Administrator, the State of Alabama can reasonably expect to receive a gross total of \$62,466,320.97 to be paid to the State and Local Governments over the thirteen Payment Years.²

The State and Local Governments entered into an intergovernmental agreement, the *Teva, Allergan, CVS, & Walgreens Allocation Agreement*, to allocate settlement proceeds between themselves. Pursuant to §B.1 of the *Teva, Allergan, CVS, & Walgreens Allocation Agreement*, “The State, Political Subdivisions, and Governmental Public Health Entities shall divide settlement funds recovered by the State with 40% going to the Political Subdivisions, 10% going to the

¹ For each election thus far, the State of Alabama elected to receive cash.

² For all relevant purposes, Payment Year 1 and Payment Year 2 will both be issued in 2024.

Government Public Health Entities, and 50% going to the State.” Accordingly, the allocation of the Teva gross settlement to the State and Local Governments is as follows:

Teva Settlement Summary	Percentage	Gross Amounts
State of Alabama	50%	\$31,233,160.48
Gross to Alabama Political Subdivisions	40%	\$24,986,528.39
Gross to Governmental Public Health Entities	10%	\$6,246,632.10
		\$62,466,320.97

II. Administrative Costs

Pursuant to the *Order Establishing Qualified Settlement Fund and Appointing Receiver for the Fund* (see Doc. 2834) and the *Order Appointing Special Master* (see Doc. 2818), the administrative costs attributable to the Alabama Local Government portion are \$60,000. Pursuant §2 of the Appointing Order, \$30,000 shall be paid to Special Master Joseph Tann. According to ¶8 of the QSF Order, \$30,000 shall be paid to Richard Weinberg of Winbridge Partners for his services as the court-appointed Receiver.

III. Political Subdivision & Governmental Public Health Entity Attorneys’ Fees

A. Attorneys’ Fees – Committee Fee Fund

To compensate the court-appointed leadership Committees for common benefit work (see Doc. 2675), the Court ordered that, “the Committee Fee Fund shall be funded in the future in additional amounts equaling two percent (2%) of any future gross recoveries from any opioid supply chain participants, whether manufacturer, distributor, or retailer, that are allocated in whole or in part to Alabama local governments, boards of health, and public health authorities ***that have filed cases in the MDL.***” On January 21, 2023, the Court increased the percentage from 2% to 3.5% for all settlements with an effective date on or after September 20, 2022. (see Doc. 2971)

The total Committee Fee Fund award for the Teva Settlement is \$1,004,881.44. Pursuant to the original Committee Fee Fund Court Order, the full Committee Fee Fund award will be distributed “as soon as those funds are available.” (i.e., Payment Year 1) The court-appointed Committee Fee Fund members voluntarily agreed to the division and allocation of the Committee Fee Fund compensation, and the Special Master accepted their agreement.

B. Attorneys’ Fees – National Contingency Fee Fund & Alabama Backstop

Nearly all law firms representing Alabama Local Governments were eligible to participate in the Teva National Contingency Fee Fund established by Exhibit R of the *Teva Global Opioid Settlement Agreement*. The law firms representing Alabama Local Governments expect to collectively receive almost \$3 million over six Payment Years from the Teva National Contingency Fee Fund. Additionally, the Special Master concludes that allocating \$4,582,801.63 from the Alabama Local Government Share appropriately compensates counsel representing Alabama Local Governments. This amount, less \$30,000 to be paid to the Special Master in accordance with *Order Appointing Special Master* (see Doc. 2818), will be used to pay attorneys’ fees to the law firms representing Local Governments. These fees will be paid in equal installments over six Payment Years.

After the expiration of the objection period described in Section IV of this Special Master Report, the Special Master will separately notify the attorneys representing Alabama Local Governments of their attorney fee awards for each client.

IV. Payments to Alabama Political Subdivisions & Governmental Public Health Entities

A. Payments to Political Subdivisions

Net of all applicable administrative fees and expenses, and after accounting for the attorneys’ fees, \$25,585,477.40 is available to pay Political Subdivisions & Governmental Public

Health Entities. The methodology for awarding the funds to Political Subdivisions is substantially similar to the methodology used in MDL 2804. At the county-level, the model incorporates the following factors:

1. The number of persons suffering from opioid use disorder in the county;
2. The number of overdose deaths that occurred in the county; and
3. The amount of opioids distributed within the county by Morphine Milligram Equivalent.

For Cities/Towns, the formula draws on US Census Bureau data on local government spending by function. The functions or expenditure categories examined for each jurisdiction were: elementary and secondary education net of capital outlay, public welfare (including child protective services), hospitals net of capital outlay, health, police protection, fire protection, corrections net of capital outlay, housing and community development, and judicial and legal.

B. Payment to Governmental Public Health Entities

The allocation percentages for payments to Governmental Public Health Entities were determined by an arbitration proceeding conducted by the Honorable Sally Shushan, a retired federal magistrate judge on the United States District Court for the Eastern District of Louisiana. For the Teva allocation, the Special Master sees no reason to deviate from the previously arbitrated allocations. For newly added Governmental Public Health Entities, the Special Master used an allocation methodology based on the number of beds for each hospital/healthcare authority.

All Alabama Political Subdivisions & Governmental Public Health Entities eligible to participate in the Teva Settlement were assigned an allocation amount using the allocation model referenced above. The \$25,585,477.40 for Political Subdivisions will be paid over thirteen Payment Years. The net amount to each Political Subdivision and Governmental Public Health

Entity³ is hereby allocated as outlined in the attached Exhibit A. Detailed payment schedules for each Alabama Subdivision and Governmental Public Health Entity will soon be available in the Rubris Crosslink System.

If a Political Subdivision or Governmental Public Health Entity wishes to object to its payment amount, it must do so **no later than 5:00 pm CDT on October 14, 2024, at which time all Political Subdivision amounts will become final.**

Teva – Local Government Allocation Summary		
Committee Fee Fund	\$1,004,881.44	3.22%
Administrative Expenses	\$90,000.00	0.29%
Alabama Backstop/Deficiency Fee Fund	\$4,552,801.63	14.58%
Net to Alabama Local Governments	\$25,585,477.40	81.92%
	\$31,233,160.48	100.00%

Description	Payment Year 1	Payment Year 2 - 6	Payment Year 7 - 13
Committee Fee Fund	\$1,004,881.44	\$0.00	\$0.00
Administrative Expenses	\$90,000.00	\$0.00	\$0.00
Alabama Backstop/Deficiency Fee Fund	\$758,800.27	\$758,800.27	\$0.00
Net to Alabama Local Governments	\$367,331.76	\$1,695,337.88	\$2,391,636.60
	\$2,221,013.47	\$2,454,138.16	\$2,391,636.60

IT IS SO ORDERED.

SPECIAL MASTER

Joseph C. Tann, ESQ

Dated: October 4, 2024

³ Assuming no reductions to the total amount distributed to the State of Alabama and Local Governments from the Directing Administrator under the *Teva Global Opioid Settlement Agreement*.

Exhibit A**Teva-Alabama Local Government Allocations****\$25,585,477.40**

Alabama Local Government	Net to Alabama Local Government
Abbeville	\$13,818.79
Alabaster	\$128,559.75
Albertville	\$77,448.61
Alexander City	\$79,780.16
Anniston	\$206,001.16
Arab	\$48,878.93
Argo	\$6,157.05
Ashland	\$9,806.75
Ashville	\$4,568.58
Athens	\$86,933.22
Attalla	\$42,370.74
Auburn	\$122,712.05
<i>Autauga County</i>	\$63,980.29
<i>Baldwin County</i>	\$365,363.92
<i>Barbour County</i>	\$18,714.80
Bay Minette	\$32,030.21
Berry	\$5,298.83
Bessemer	\$148,099.40
<i>Bibb County</i>	\$81,770.48
Birmingham	\$1,051,194.92
<i>Blount County</i>	\$191,283.34
Boaz	\$42,733.25
Brent	\$16,030.58
Brewton	\$54,996.00
Bridgeport	\$389.65
Brookwood	\$1,768.91
Brundidge	\$2,737.91
<i>Bullock County</i>	\$15,950.93
Butler	\$21,126.56
<i>Butler County</i>	\$13,644.99
Calera	\$60,436.12
<i>Calhoun County</i>	\$193,288.34
Camp Hill	\$1,564.37

Carbon Hill	\$23,983.63
Cedar Bluff	\$14,746.85
Center Point	\$2,759.92
Centre	\$37,214.57
Centreville	\$5,893.60
Chambers County	\$109,674.22
Chelsea	\$19,887.90
Cherokee	\$2,156.80
Cherokee County	\$75,731.35
Chickasaw	\$20,741.53
Childersburg	\$24,913.57
Chilton County	\$163,602.58
Choctaw County	\$31,932.12
Clanton	\$42,861.29
Clarke County	\$60,973.70
Clay County	\$43,840.25
Cleburne County	\$52,760.62
Cleveland	\$3,283.04
Coffee County	\$77,481.70
Colbert County	\$83,145.00
Columbiana	\$12,442.04
Conecuh County	\$39,219.76
Coosa County	\$30,594.71
Cordova	\$24,594.22
Covington County	\$114,787.05
Crenshaw County	\$36,972.87
Cullman	\$133,686.01
Cullman County	\$227,718.75
Dadeville	\$6,219.32
Dale County	\$61,756.92
Daleville	\$19,685.83
Dallas County	\$51,400.14
Daphne	\$82,744.73
Dauphin Island	\$11,861.68
De Kalb County	\$103,166.16
Decatur	\$468,109.63
Demopolis	\$36,365.83
Dora	\$23,796.87
Dothan	\$276,856.53

Double Springs	\$20,378.06
Douglas	\$250.52
East Brewton	\$6,602.28
Elmore County	\$138,281.58
Enterprise	\$82,617.09
Escambia County	\$165,466.31
Etowah County	\$258,317.64
Eufaula	\$54,673.99
Evergreen	\$10,660.11
Fairfield	\$30,087.32
Fairhope	\$55,486.74
Faunsdale	\$70.89
Fayette County	\$35,688.14
Fayette	\$20,272.06
Florence	\$225,200.91
Foley	\$85,469.14
Fort Deposit	\$1,282.47
Fort Payne	\$146,233.46
Franklin County	\$74,189.07
Fultondale	\$24,544.39
Gadsden	\$210,147.68
Gardendale	\$41,855.52
Geneva	\$17,074.01
Geneva County	\$56,756.23
Georgiana	\$4,715.04
Geraldine	\$2,835.94
Gilbertown	\$519.10
Grant	\$4,384.12
Graysville	\$9,486.96
Greene County	\$17,528.70
Greensboro	\$6,418.14
Greenville	\$44,013.59
Guin	\$6,300.58
Gulf Shores	\$121,234.50
Guntersville	\$65,461.18
Gurley	\$1,867.96
Hale County	\$33,920.15
Haleyville	\$36,209.68
Hamilton	\$22,445.85

Hammondville	\$1,262.71
Hartselle	\$15,801.31
Headland	\$16,147.79
Helena	\$34,642.99
Henagar	\$8,839.01
Henry County	\$20,920.40
Homewood	\$101,026.56
Hoover	\$358,181.54
Houston County	\$141,869.57
Hueytown	\$48,321.55
Huntsville	\$792,532.01
Irondale	\$43,851.75
Jackson County	\$40,711.16
Jacksonville	\$63,505.96
Jasper	\$363,077.22
Jefferson County	\$1,368,726.52
Killen	\$4,721.00
Lamar County	\$42,451.59
Lanett	\$32,918.83
Lauderdale County	\$120,864.61
Lawrence County	\$112,717.28
Lee County	\$73,041.74
Leeds	\$38,556.79
Leesburg	\$4,872.12
Leighton	\$1,454.29
Level Plains	\$901.66
Limestone County	\$147,755.93
Lincoln	\$46,890.40
Linden	\$4,418.32
Locust Fork	\$1,005.08
Louisville	\$1,176.14
Lowndes County	\$17,249.98
Loxley	\$10,444.80
Luverne	\$4,056.82
Macon County	\$35,098.66
Madison County	\$333,247.37
Madison	\$117,016.99
Marengo County	\$12,375.85
Marion	\$5,852.94

Marion County	\$57,421.95
Marshall County	\$188,318.13
McKenzie	\$1,133.00
Midfield	\$100.10
Millbrook	\$61,515.76
Mobile	\$802,073.47
Mobile County	\$685,932.61
Monroe County	\$46,783.33
Monroeville	\$26,390.24
Montgomery	\$457,070.34
Montgomery County	\$252,118.45
Moody	\$9,193.90
Morgan County	\$77,966.06
Moulton	\$33,662.93
Mountain Brook	\$88,601.02
Munford	\$6,401.67
Muscle Shoals	\$69,091.25
Nauvoo	\$4,810.51
New Hope	\$3,368.31
Northport	\$107,706.51
Oakman	\$10,775.26
Oneonta	\$69,638.74
Opelika	\$133,344.69
Opp	\$23,024.86
Orange Beach	\$74,696.43
Oxford	\$90,623.45
Ozark	\$73,308.06
Parrish	\$30,054.25
Pelham	\$170,819.07
Pell City	\$114,297.04
Perry County	\$13,084.86
Phenix City	\$155,551.28
Pickens County	\$73,814.11
Piedmont	\$36,434.97
Pike County	\$7,384.58
Pike Road	\$2,922.12
Pleasant Grove	\$12,843.82
Powell	\$1,366.22
Prattville	\$149,927.47

Priceville	\$3,026.04
Prichard	\$28,335.01
Ragland	\$3,859.16
Rainbow City	\$34,178.62
Rainsville	\$48,459.26
<i>Randolph County</i>	\$44,105.24
Red Bay	\$16,159.33
Roanoke	\$27,107.33
Robertsdale	\$22,056.38
Rockford	\$1,513.73
<i>Russell County</i>	\$43,816.65
Russellville	\$81,612.71
Saraland	\$61,748.85
Satsuma	\$16,100.01
Scottsboro	\$170,887.97
Selma	\$65,593.61
Semmes	\$10,438.45
Sheffield	\$41,447.35
<i>Shelby County</i>	\$411,373.49
Sipsey	\$9,666.64
Slocomb	\$11,377.50
Spanish Fort	\$7,305.31
Springville	\$14,679.96
<i>St Clair County</i>	\$260,729.84
Sumiton	\$59,899.07
Summerdale	\$6,221.99
<i>Sumter County</i>	\$29,358.05
Sweet Water	\$77.16
Sylacauga	\$59,366.62
Talladega	\$60,419.48
<i>Talladega County</i>	\$136,579.33
<i>Tallapoosa County</i>	\$48,912.00
Tarrant	\$23,203.57
Thomasville	\$22,478.73
Troy	\$81,569.17
Trussville	\$62,874.85
Tuscaloosa	\$495,465.21
<i>Tuscaloosa County</i>	\$251,609.41
Tuscumbia	\$22,020.38

Tuskegee	\$23,606.53
Union Springs	\$10,514.08
Uniontown	\$4,666.50
Vance	\$2,476.43
Vernon	\$8,280.80
Vestavia Hills	\$79,413.04
Walker County	\$376,925.74
Washington County	\$40,095.02
Weaver	\$10,872.49
West Blocton	\$10,402.20
Wetumpka	\$41,254.85
Wilcox County	\$21,846.40
Winfield	\$48,924.89
Winston County	\$39,323.55
Woodville	\$118.80
Yellow Bluff	\$753.71
Attentus Mouton, LLC d/b/a Lawrence Medical Center (Lawrence County Health Care Authority)	\$27,393.63
Bibb County Healthcare Authority d/b/a Bibb Medical Center	\$102,786.66
Cullman Regional Medical Center, Inc. (Healthcare Authority of Cullman County)	\$88,517.72
Dale County Healthcare Authority d/b/a Dale Medical Center	\$58,641.11
DCH Health Care Authority (Tuscaloosa) (d/b/a DCH Regional Medical Center and Northport Medical Center	\$454,531.60
Decatur Morgan Hospital-Parkway (Health Care Authority of the City of Huntsville)	\$75,934.25
East Alabama Health Care Authority	\$220,842.10
Escambia County Health Care Authority d/b/a D.W. McMillan Memorial Hospital and Atmore Community Hospital	\$30,308.89
Geneva County Health Care Authority d/b/a Wiregrass Medical Center	\$95,538.88
Greene County Health System/Hospital Board	\$60,617.78
Health Care Authority of Clarke County d/b/a Grove Hill Memorial Hospital	\$19,521.97
Health Care Authority of the City of Huntsville d/b/a Huntsville Hospital	\$607,988.11
Health Care Authority of the City of Huntsville d/b/a Huntsville Hospital for Women and Children	\$0.00
Health Care Authority of the City of Huntsville d/b/a Madison Hospital	\$0.00

Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Baptist Medical Center East (Montgomery)	\$137,290.56
Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Baptist Medical Center South (Montgomery)	\$300,565.28
Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Prattville Baptist Hospital	\$50,823.91
HH Health System-Athens Limestone, LLC d/b/a Athens Limestone Hospital (Healthcare Authority of the City of Huntsville)	\$42,046.04
HH Health System-Morgan, LLC d/b/a Decatur Morgan Hospital Decatur	\$238,260.84
HH Health Systems-Shoals LLC d/b/a Hellen Keller Hospital (Healthcare Authority of the City of Huntsville)	\$115,435.99
HH Health Systems-Shoals, LLC d/b/a Red Bay Hospital (Healthcare Authority of the City of Huntsville)	\$15,819.63
Houston County Health Care Authority	\$223,373.24
J Paul Jones Hospital	\$13,288.49
HH Health System-Jackson, LLC d/b/a Highlands Medical Center (Jackson County Health Care Authority)	\$61,380.90
Lakeland Community Hospital HCA Winston County	\$32,995.63
HH Health System-Marshall, LLC d/b/a Marshall Medical Center North (Marshall County Health Care Authority)	\$67,522.45
HH Health System-Marshall, LLC d/b/a Marshall Medical South (Marshall County Health Care Authority)	\$112,635.80
Medical West Hospital Authority (UAB)	\$165,651.52
Monroe County Health Care Authority d/b/a Monroe County Hospital	\$30,975.49
Northeast Alabama Regional Medical Center (Health Care Authority of the City of Anniston)	\$374,078.57
Sylacauga Health Care Authority d/b/a Coosa Valley Medical Center	\$93,562.22
Tombigbee Health Care Authority d/b/a Brian W. Whitfield Memorial Hospital	\$44,145.56
Jefferson County Board of Health	\$774,902.99
Mobile County Board of Health	\$512,963.04
Family-Oriented Primary Health Clinic	



IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

THE STATE OF ALABAMA,

Plaintiff,

-vs-

**ENDO HEALTH SOLUTIONS, INC.,
et al.,**

Defendants.

CASE NO. CV-2019-901174.0

SUBMISSION OF SPECIAL MASTER REPORT

COMES NOW the Local Government Executive Committee and submits the
Walgreens- Alabama Political Subdivisions and Government Public Health Entities Special
Master Report attached hereto.

/s/ Christina D. Crow

Christina D. Crow (ASB-0637-C58C)

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/s/ Matthew D. Conn

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/s/ Keith Jackson

Keith Jackson (ASB-7519-J66B)

Riley & Jackson, P.C.

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Birmingham, AL 35209

(205) 879-5000

kj@rileyjacksonlaw.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been filed through the court electronic filing system and that where appropriate, I have served a copy of same has been deposited in the U.S. Mail, properly addressed and postage prepaid, on this date for service on the counsel as required by law.

Is/Christina D. Crow
OF COUNSEL

**Walgreens - Alabama
Political Subdivision & Governmental Public Health Entity
Special Master Report**

I. Total Gross Amount to the State of Alabama, Political Subdivisions, and Governmental Public Health Entities

In 2023, Walgreens (“Walgreens”) and its respective past and present direct or indirect parents, subsidiaries, divisions, affiliates, joint ventures, predecessors, successors, and assigns entered into a global settlement with various states and political subdivisions. Walgreens agreed to pay up to \$5.52 billion over 15 years. The State of Alabama (“the State”) and all relevant Alabama Political Subdivisions and Governmental Public Health Entities (collectively, “Local Governments”) are participating in the Walgreens Settlement Agreement. According to reports provided to the Special Master by the national Directing Administrator, the State of Alabama can reasonably expect to receive a gross total of \$82,828,490.35 to be paid to the State and Local Governments over the fifteen Payment Years.¹

The State and Local Governments entered into an intergovernmental agreement, the *Teva, Allergan, CVS, & Walgreens Allocation Agreement*, to allocate settlement proceeds between themselves. Pursuant to §B.1 of the *Teva, Allergan, CVS, & Walgreens Allocation Agreement*, “The State, Political Subdivisions, and Governmental Public Health Entities shall divide settlement funds recovered by the State with 40% going to the Political Subdivisions, 10% going to the Government Public Health Entities, and 50% going to the State.”

Accordingly, the allocation of the Walgreens gross settlement to the State and Local Governments is as follows:

¹ For all purposes relevant to this Special Master Report, Payment Year 1 and Payment Year 2 will both be issued in December 2024.

Walgreens Settlement Summary	Percentage	Gross Amounts
State of Alabama	50%	\$41,414,245.18
Gross to Political Subdivisions	40%	\$33,131,396.14
Gross to Special Districts	10%	\$8,282,849.04
Total Amount	100%	\$82,828,490.35

II. Administrative Costs

Pursuant to the *Order Establishing Qualified Settlement Fund and Appointing Receiver for the Fund* (see Doc. 2834) and the *Order Appointing Special Master* (see Doc. 2818), the administrative costs attributable to the Alabama Local Government portion are \$60,000. Pursuant to §2 of the Appointing Order, \$30,000 shall be paid to Special Master Joseph Tann. Pursuant to ¶8 of the QSF Order, \$30,000 shall be paid to Richard Weinberg of Winbridge Partners for his services as the court-appointed Receiver.

III. Political Subdivision & Governmental Public Health Entity Attorneys' Fees

A. Attorneys' Fees – Committee Fee Fund

To compensate the court-appointed leadership Committees for common benefit work (see Doc. 2675), the Court ordered, “the Committee Fee Fund shall be funded in the future in additional amounts equaling two percent (2%) of any future gross recoveries from any opioid supply chain participants, whether manufacturer, distributor, or retailer, that are allocated in whole or in part to Alabama local governments, boards of health, and public health authorities that have filed cases in the MDL.” On January 21, 2023, the Court increased the percentage from 2% to 3.5% for all settlements with an effective date on or after September 20, 2022. (see Doc. 2971)

The total Committee Fee Fund award for the Walgreens Settlement is \$1,332,443.01. Pursuant to the original Committee Fee Fund Court Order, the full Committee Fee Fund award will be distributed “as soon as those funds are available.” (i.e., Payment Year 1) The court-

appointed Committee Fee Fund members voluntarily agreed to the division and allocation of the Committee Fee Fund compensation, and the Special Master accepted their agreement.

B. Attorneys' Fees – National Contingency Fee Fund & Alabama Backstop/Deficiency Fund

Many law firms representing Alabama Local Governments were eligible to participate in the Walgreens National Contingency Fee Fund established by Exhibit R of the *Walgreens Settlement Agreement*. The law firms representing Alabama Local Governments expect to collectively receive approximately \$4.12 million over six Payment Years from the Walgreens National Contingency Fee Fund.² Additionally, the Special Master concludes that allocating \$4,472,643.09 from the Alabama Local Government Share to the Alabama Backstop/Deficiency Fund appropriately compensates counsel representing Alabama Local Governments.³ This amount, less \$30,000 to be paid to the Special Master in accordance with *Order Appointing Special Master* (see Doc. 2818), will be used to pay attorneys' fees to the law firms representing Local Governments. These fees will be paid in equal installments over six Payment Years.

The Special Master will separately notify the attorneys representing Alabama Local Governments of their attorney fee awards for each client via the Rubris Crosslink System.

IV. Payments to Alabama Political Subdivisions & Governmental Public Health Entities

A. Payments to Political Subdivisions

Net of all applicable administrative fees and expenses, and after accounting for the attorneys' fees, \$35,549,159.07 is available to pay Political Subdivisions & Governmental Public

² The six Payment Years are Payment Years 2 – 7 of the national Walgreens Settlement Agreement.

³ Law firms representing Alabama Local Governments whose clients named Walgreens in a lawsuit before the cutoff date imposed by Exhibit R of the Walgreens Settlement Agreement are capped at an amount equal to ~25% of their client's gross recovery. Law firms representing Alabama Local Governments whose clients did not name Walgreens in a lawsuit before the cutoff date imposed by Exhibit R of the Walgreens Settlement Agreement are capped at an amount equal to ~15% of their client's gross recovery.

Health Entities. The methodology for awarding the funds to Political Subdivisions is substantially similar to the methodology used in MDL 2804. At the county-level, the model incorporates the following factors:

1. The number of persons suffering from opioid use disorder in the county;
2. The number of overdose deaths that occurred in the county; and
3. The amount of opioids distributed within the county by Morphine Milligram Equivalent.

For Cities/Towns, the formula draws on US Census Bureau data on local government spending by function. The functions or expenditure categories examined for each jurisdiction were: elementary and secondary education net of capital outlay, public welfare (including child protective services), hospitals net of capital outlay, health, police protection, fire protection, corrections net of capital outlay, housing and community development, and judicial and legal.

B. Payment to Governmental Public Health Entities

The allocation percentages for payments to Governmental Public Health Entities were determined by an arbitration proceeding conducted by the Honorable Sally Shushan, a retired federal magistrate judge on the United States District Court for the Eastern District of Louisiana. For the Walgreens allocation, the Special Master sees no reason to deviate from the previously arbitrated allocations. For newly added Governmental Public Health Entities, the Special Master used an allocation methodology based on the number of beds for each hospital/healthcare authority.

All Alabama Political Subdivisions & Governmental Public Health Entities eligible to participate in the Walgreens Settlement were assigned an allocation amount using the allocation model referenced above.

The \$35,549,159.07 to Alabama Local Governments will be paid over fifteen Payment Years.⁴ The net amount to each Political Subdivision and Governmental Public Health Entity is hereby allocated as outlined in the attached Exhibit A.⁵ Detailed payment schedules for each Alabama Subdivision and Governmental Public Health Entity will soon be available in the Rubris Crosslink System. If a Political Subdivision or Governmental Public Health Entity wishes to object to its payment amount, it must do so **no later than 5:00 pm CDT on December 16, 2024, at which time all Political Subdivision amounts will become final.**

Description	Total	Percentage
Committee Fee Fund	\$1,332,443.01	3.22%
Administrative Expenses	\$90,000.00	0.22%
Alabama Backstop/Deficiency Fee Fund	\$4,442,643.09	10.73%
Net to Alabama Local Governments	\$35,549,159.07	85.84%
	\$41,414,245.18	100.00%

IT IS SO ORDERED.

SPECIAL MASTER

Joseph C. Tann, ESQ

Dated: December 6, 2024

⁴ This amount assumes no reductions to the total amount distributed to the State of Alabama and Local Governments from the Directing Administrator under the *Walgreens Settlement Agreement*.

⁵ Projected payment streams to all Local Governments and law firms will be available in the Rubris Crosslink System in the near future.

Exhibit A

Walgreens - Alabama Local Government Allocations

\$35,549,159.07

Alabama Local Government	Net to Alabama Local Governments
Abbeville	\$17,998.09
Alabaster	\$182,068.67
Albertville	\$112,676.04
Alexander City	\$103,908.53
Anniston	\$268,303.29
Arab	\$71,532.28
Argo	\$8,019.16
Ashland	\$13,075.71
Ashville	\$6,685.91
Athens	\$125,459.65
Attalla	\$61,643.00
Auburn	\$177,094.67
Autauga County	\$84,397.12
Baldwin County	\$527,283.17
Barbour County	\$24,374.82
Bay Minette	\$46,874.89
Berry	\$7,719.72
Bessemer	\$209,741.05
Bibb County	\$110,216.24
Birmingham	\$1,500,695.07
Blount County	\$249,134.28
Boaz	\$62,170.44
Brent	\$20,878.80
Brewton	\$79,368.72
Bridgeport	\$506.79
Brookwood	\$2,588.75
Brundidge	\$3,650.55
Bullock County	\$21,499.83
Butler	\$30,735.57
Butler County	\$17,999.26
Calera	\$87,219.78
Calhoun County	\$273,528.20
Camp Hill	\$2,275.90

Carbon Hill	\$31,237.15
Cedar Bluff	\$21,454.43
Center Point	\$3,594.61
Centre	\$54,141.57
Centreville	\$7,676.03
Chambers County	\$142,843.62
Chelsea	\$26,411.62
Cherokee	\$3,137.79
Cherokee County	\$102,076.26
Chickasaw	\$27,014.50
Childersburg	\$36,244.99
Chilton County	\$220,515.52
Choctaw County	\$42,122.01
Clanton	\$56,538.82
Clarke County	\$80,431.08
Clay County	\$55,463.13
Cleburne County	\$68,717.32
Cleveland	\$4,270.02
Coffee County	\$111,819.46
Colbert County	\$119,290.36
Columbiana	\$17,956.01
Conecuh County	\$51,735.22
Coosa County	\$40,793.06
Cordova	\$32,032.39
Covington County	\$153,049.83
Crenshaw County	\$48,154.79
Cullman	\$192,931.97
Cullman County	\$333,256.99
Dadeville	\$8,100.26
Dale County	\$81,464.24
Daleville	\$25,967.81
Dallas County	\$74,179.29
Daphne	\$120,381.07
Dauphin Island	\$15,449.07
De Kalb County	\$134,180.72
Decatur	\$675,562.98
Demopolis	\$49,016.53
Dora	\$34,620.84
Dothan	\$365,204.55
Double Springs	\$26,880.93

Douglas	\$364.46
East Brewton	\$9,528.23
Elmore County	\$199,564.20
Enterprise	\$119,230.71
Escambia County	\$218,268.46
Etowah County	\$368,776.51
Eufaula	\$71,209.37
Evergreen	\$13,884.11
Fairfield	\$39,186.81
Fairhope	\$80,076.94
Faunsdale	\$92.33
Fayette County	\$51,993.05
Fayette	\$29,533.80
Florence	\$318,933.65
Foley	\$123,346.74
Fort Deposit	\$1,850.84
Fort Payne	\$208,764.17
Franklin County	\$96,492.32
Fultondale	\$35,708.38
Gadsden	\$300,008.67
Gardendale	\$55,585.16
Geneva	\$22,237.80
Geneva County	\$73,921.34
Georgiana	\$6,141.03
Geraldine	\$3,688.49
Gilbertown	\$755.22
Grant	\$6,378.25
Graysville	\$13,802.07
Greene County	\$23,626.46
Greensboro	\$8,359.22
Greenville	\$57,324.88
Guin	\$8,492.38
Gulf Shores	\$174,962.32
Guntersville	\$95,236.12
Gurley	\$2,517.76
Hale County	\$44,178.82
Haleyville	\$47,764.59
Hamilton	\$30,254.15
Hammondville	\$1,642.33
Hartselle	\$22,804.03

Headland	\$21,031.46
Helena	\$49,995.83
Henagar	\$11,496.25
Henry County	\$27,247.49
Homewood	\$143,075.64
Hoover	\$507,263.21
Houston County	\$187,141.74
Hueytown	\$69,736.31
Huntsville	\$1,143,760.43
Irondale	\$62,103.65
Jackson County	\$52,950.04
Jacksonville	\$92,938.33
Jasper	\$528,222.46
Jefferson County	\$1,975,308.54
Killen	\$6,140.27
Lamar County	\$60,998.32
Lanett	\$42,874.67
Lauderdale County	\$171,170.64
Lawrence County	\$151,928.59
Lee County	\$97,001.21
Leeds	\$50,217.75
Leesburg	\$7,130.13
Leighton	\$2,115.76
Level Plains	\$1,174.34
Limestone County	\$194,906.51
Lincoln	\$68,622.14
Linden	\$5,754.58
Locust Fork	\$1,309.06
Louisville	\$1,551.45
Lowndes County	\$23,250.79
Loxley	\$15,285.55
Luverne	\$5,132.36
Macon County	\$45,713.75
Madison County	\$487,693.77
Madison	\$157,724.05
Marengo County	\$16,681.09
Marion	\$7,889.01
Marion County	\$74,684.54
Marshall County	\$275,595.79
McKenzie	\$1,475.66

Midfield	\$130.38
Millbrook	\$88,777.86
Mobile	\$1,157,530.41
Mobile County	\$989,919.12
Monroe County	\$63,058.00
Monroeville	\$35,570.69
Montgomery	\$595,304.76
Montgomery County	\$328,368.09
Moody	\$13,454.86
Morgan County	\$112,518.48
Moulton	\$45,373.36
Mountain Brook	\$127,866.54
Munford	\$9,059.17
Muscle Shoals	\$89,861.95
Nauvoo	\$6,265.38
New Hope	\$4,900.39
Northport	\$157,624.04
Oakman	\$15,698.16
Oneonta	\$90,574.04
Opelika	\$192,439.41
Opp	\$31,034.59
Orange Beach	\$109,315.15
Oxford	\$118,031.23
Ozark	\$98,809.97
Parrish	\$39,143.73
Pelham	\$246,521.40
Pell City	\$148,864.56
Perry County	\$17,042.19
Phenix City	\$224,487.33
Pickens County	\$96,004.63
Piedmont	\$53,321.06
Pike County	\$10,657.24
Pike Road	\$3,880.64
Pleasant Grove	\$18,535.86
Powell	\$1,776.93
Prattville	\$216,371.22
Priceville	\$4,078.71
Prichard	\$41,228.37
Ragland	\$5,647.70
Rainbow City	\$50,018.99

Rainsville	\$63,027.44
<i>Randolph County</i>	\$63,651.48
Red Bay	\$21,017.25
Roanoke	\$39,120.55
Robertsdale	\$32,088.71
Rockford	\$1,971.53
<i>Russell County</i>	\$57,068.38
Russellville	\$106,147.72
Saraland	\$89,114.24
Satsuma	\$20,969.23
Scottsboro	\$222,261.53
Selma	\$94,662.88
Semmes	\$15,064.49
Sheffield	\$60,299.64
<i>Shelby County</i>	\$548,499.52
Sipsey	\$12,590.17
Slocomb	\$16,575.56
Spanish Fort	\$10,542.83
Springville	\$21,483.52
<i>St Clair County</i>	\$347,640.75
Sumiton	\$87,144.11
Summerdale	\$9,105.63
<i>Sumter County</i>	\$39,570.92
Sweet Water	\$100.49
Sylacauga	\$86,489.55
Talladega	\$85,501.44
<i>Talladega County</i>	\$193,277.54
<i>Tallapoosa County</i>	\$69,827.19
Tarrant	\$30,814.91
Thomasville	\$32,896.68
Troy	\$117,718.37
Trussville	\$91,600.62
Tuscaloosa	\$725,092.88
<i>Tuscaloosa County</i>	\$363,115.81
Tuscumbia	\$31,593.20
Tuskegee	\$30,745.99
Union Springs	\$14,171.65
Uniontown	\$6,077.82
Vance	\$3,225.39
Vernon	\$11,880.51

Vestavia Hills	\$115,533.95
Walker County	\$548,369.97
Washington County	\$54,043.00
Weaver	\$14,160.72
West Blocton	\$15,154.66
Wetumpka	\$59,537.85
Wilcox County	\$29,446.17
Winfield	\$63,721.53
Winston County	\$52,222.64
Woodville	\$154.51
Yellow Bluff	\$981.66
Attentus Mouton, LLC d/b/a Lawrence Medical Center (Lawrence County Health Care Authority)	\$36,135.24
Bibb County Healthcare Authority d/b/a Bibb Medical Center	\$136,735.17
Cullman Regional Medical Center, Inc. (Healthcare Authority of Cullman County)	\$115,128.56
Dale County Healthcare Authority d/b/a Dale Medical Center	\$78,009.17
DCH Health Care Authority (Tuscaloosa) (d/b/a DCH Regional Medical Center and Northport Medical Center	\$591,642.58
Decatur Morgan Hospital-Parkway (Health Care Authority of the City of Huntsville)	\$100,842.53
East Alabama Health Care Authority	\$293,283.69
Escambia County Health Care Authority d/b/a D.W. McMillan Memorial Hospital and Atmore Community Hospital	\$40,319.35
Geneva County Health Care Authority d/b/a Wiregrass Medical Center	\$127,093.59
Greene County Health System/Hospital Board	\$80,638.69
Health Care Authority of Clarke County d/b/a Grove Hill Memorial Hospital	\$26,295.23
Health Care Authority of the City of Huntsville d/b/a Huntsville Hospital	\$789,092.80
Health Care Authority of the City of Huntsville d/b/a Huntsville Hospital for Women and Children	\$0.00
Health Care Authority of the City of Huntsville d/b/a Madison Hospital	\$0.00

Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Baptist Medical Center East (Montgomery)	\$182,313.57
Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Baptist Medical Center South (Montgomery)	\$357,615.07
Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Prattville Baptist Hospital	\$67,491.08
HH Health System-Athens Limestone, LLC d/b/a Athens Limestone Hospital (Healthcare Authority of the City of Huntsville)	\$55,463.39
HH Health System-Morgan, LLC d/b/a Decatur Morgan Hospital Decatur	\$314,292.55
HH Health Systems-Shoals LLC d/b/a Hellen Keller Hospital (Healthcare Authority of the City of Huntsville)	\$149,583.09
HH Health Systems-Shoals, LLC d/b/a Red Bay Hospital (Healthcare Authority of the City of Huntsville)	\$21,008.86
Houston County Health Care Authority	\$296,645.11
J Paul Jones Hospital	\$17,647.44
HH Health System-Jackson, LLC d/b/a Highlands Medical Center (Jackson County Health Care Authority)	\$79,833.67
Lakeland Community Hospital HCA Winston County	\$42,948.87
HH Health System-Marshall, LLC d/b/a Marshall Medical Center North (Marshall County Health Care Authority)	\$75,631.90
HH Health System-Marshall, LLC d/b/a Marshall Medical South (Marshall County Health Care Authority)	\$149,583.09
Medical West Hospital Authority (UAB)	\$215,620.85
Monroe County Health Care Authority d/b/a Monroe County Hospital	\$40,319.35
Northeast Alabama Regional Medical Center (Health Care Authority of the City of Anniston)	\$496,665.39
Sylacauga Health Care Authority d/b/a Coosa Valley Medical Center	\$124,464.07
Tombigbee Health Care Authority d/b/a Brian W. Whitfield Memorial Hospital	\$58,726.00
Jefferson County Board of Health	\$1,118,318.71

Mobile County Board of Health	\$743,606.87
Family Oriented Primary Health Clinic	



IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

THE STATE OF ALABAMA,
Plaintiff,

V.

ENDO HEALTH SOLUTIONS, INC.,
ENDO PHARMACEUTICALS, INC.,
MCKESSON CORPORATION,
PURDUE PHARMA INC. ET AL,
Defendants.

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(Case No.: CV-2019-901174.00
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SUBMISSION OF SPECIAL MASTER REPORT

COMES NOW the Local Government Executive Committee and submits the Walmart-
Alabama Litigating Local Governments & Litigating Local Governmental Public Health Entities
Special Master Report attached hereto.

/s/ Christina D. Crow

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been filed through the appellate court electronic filing system and that I have served a copy of same on all counsel of record by e-mail and, where appropriate, a copy of same has been deposited in the U.S. Mail, properly addressed and postage prepaid, on this date for service on the counsel as required by law.

/s/Christina D. Crow
OF COUNSEL

***Walmart-Alabama
Litigating Local Governments &
Litigating Local Governmental Public Health Entities
Special Master Report***

**I. Total Amount to State and Gross Amounts to Litigating Local Governments and
Litigating Public Health Entities**

Pursuant to §V.B of the *Walmart Alabama State-Wide Opioid Settlement Agreement* (“WASA”), “...Walmart shall pay to the State of Alabama the sum of \$38,700,000 (the “*Remediation Amount*”) attributable to the Alleged Harms, which shall be used to fund Opioid Remediation throughout the State, plus the fees and costs..., subject to any holdbacks under subsections V.C.1 and V.C.2....” Pursuant to §B.1 of the *Walmart Settlement Sign-On*, “Under the settlement agreement, Walmart will pay \$38,700,000 to be used for opioid remediation around the State. The State, Political Subdivisions, and Litigating Governmental Public Health Entities (“LGPHE”)¹, shall divide settlement funds recovered by the State with \$3,000,000 going to the State and \$35,700,00 going to the Political Subdivisions and Special Districts. Of the amount going to the Political Subdivisions and Special Districts, 80% will go to the Political Subdivisions and 20% will go to the Litigating Governmental Public Health Entities.

Therefore, the gross amounts to the State, LLGs, and LGPHE, before considering holdbacks, if applicable, fees, and expenses are as follows:

¹ For the Walmart Allocation, funds shall also be distributed to the five Non-Litigating Subdivisions identified in Exhibit E to the settlement agreement should they wish to participate.

Walmart Gross Settlement Summary before Fees, Expenses, and Holdback	Percentage	Gross Amounts
State of Alabama	7.75%	\$3,000,000
Litigating Local Governments	73.80%	\$28,560,000.00 ²
Litigating Local Governmental Public Health Entities	18.45%	\$7,140,000.00
		\$38,700,000.00

II. LLG & LPGHE Administrative & Miscellaneous Fees & Expenses

Pursuant to the *Order Establishing Qualified Settlement Fund and Appointing Receiver for the Fund* (see Doc. 2834) and the *Order Appointing Special Master* (see Doc. 2839), the administrative fees and costs attributable to the LLG and LPGHE portions of the *Walmart-Alabama State-Wide Opioid Settlement Agreement* are \$60,000.00. Pursuant §2 of the Appointing Order, \$30,000.00 shall be paid to Special Master Joseph Tann. In addition, under the ¶8 QSF Order, \$30,000.00 shall be paid to Richard Weinberg of Winbridge Partners for his services as the court-appointed receiver.

III. Attorneys' Fees

A. Attorneys' Fees – Contingency Fees

§VIII.A.1 of the WASA provides for \$5,530,000.00 to be paid to the State of Alabama, “to reimburse attorneys’ fees for the State, Participating Litigating Subdivisions, and Participating Special Districts [Litigating Governmental Public Health Entities].” Attorneys for the State and LLGs/LGPHEs agreed that \$660,000.00 is to be used to pay attorneys for the State of Alabama. In addition, \$2,677,500.00 will be used to pay the national MDL Common Benefit Fund

² Because all Non-Litigating Subdivisions listed on Exhibit E executed *Settlement Participation Forms* before the Participation Date referenced in §V.C., the \$1,785,000 holdback provision is not triggered and therefore inapplicable to the final allocation and distribution of monetary relief and payments.

Assessment.³ The remainder, \$2,192,500.00, less \$30,000 to be paid to the Special Master, will be used to pay attorneys' fees for the LLGs/LGPHEs, not attorneys' fees for the State.⁴ The allocation/division of the \$2,162,500.00 fee fund was determined by multiplying the percentage of the LLG/LGPHE funds to be received by the client by the applicable contingency fee contract rate, capped at a rate of 25%. In other words, the formula used the lower of: (a) the actual contract rate, or (b) 25%.

However, the amount of compensation available under §VIII.A.1 of the WASA, which would have resulted in a cumulative average contingency fee of ~6%⁵, is insufficient compensation for counsel to the more than 250 LLGs/LLGHEs receiving payments under the WASA who have valid and enforceable contingency fee agreements with their LLG/LGPHE clients ranging from 20% to 40%.

B. Backstop/Deficiency Fund

To address the insufficient compensation afforded to counsel for LLGs/LGPHEs, an additional \$6,685,250.66 was made available from the gross amounts to the LLGs/LGPHEs listed in Section I above. When added to the \$2,162,500.00 from §VIII.A.1 of the WASA, this results in a total gross amount of \$8,847,750.66 to pay all contingent fee contracts. Counsel either has been or will be, notified by the Special Master, in writing, of the attorney fee award for each of the

³ The Special Master has been informed that the Alabama Local Government Executive Committee objects to any payment being made to the MDL common benefit fund. Evaluating the appropriateness of payments to the MDL common benefit fund under this settlement is outside the scope of the Alabama Special Master's appointment.

⁴ Pursuant §2 of the Appointing Order, the Special Master shall receive a separate payment of \$30,000... for work performed to determine the necessary and appropriate methodology for allocating attorneys' fees to local government attorneys and Litigating Governmental Public Health Entities attorneys, whether the attorney fees are distributed through an Attorney Fee Fund, a deficiency fund, a backstop fund, or otherwise. The expense will be taken out of the Attorney Fee Fund created pursuant to §VIII.A.1 of the WASA, before the allocations to counsel are determined.

⁵ This calculation is performed after adding the attorney fee fund payment back to the gross amounts for the LLGs/LGPHEs to set the denominator.

LLG/LPGHE clients they represent. Counsel for the LLGs/LGPHEs waived enforcement of their contracts other than in compliance with the terms and conditions contained within this report.

C. Attorneys' Fees - Common Benefit Fund

To compensate the court-appointed Committees for common benefit work (*see* Doc. 2675), the Court ordered that “two percent (2%) of the portion of the Johnson & Johnson and McKesson settlements be allocated to the Alabama local governments, boards of health, and public health authorities ***that have filed cases in the MDL***” be paid into the Committee Fee Fund, as defined by the Court in Doc. 2675. On January 21, 2023, the Court increased the percentage from 2% to 3.5% for all settlements with an effective date on or after September 20, 2022. (*see* Doc. 2971) However, nearly half the LGPHE cases, by allocation percentage, either are or were pending in state court, so this assessment does not apply against their settlement recoveries.

The total Committee Fee Fund award for the WASA is \$1,128,805.57. The court-appointed Committee Fee Fund members voluntarily agreed to the division and allocation of the Committee Fee Fund compensation, and the Special Master accepted their agreement.

IV. Payment Amounts to Litigating Local Governments & Litigating Local Governmental Public Health Entities

A. Payments to Litigating Local Governments

Net of all applicable administrative fees and expenses and after accounting for the holdback required by §V.C of the WASA, \$22,179,649.34 is available to pay LLGs. The methodology for awarding the funds to LLGs is substantially similar to the methodology used in MDL 2804. At the county-level, the model incorporates the following factors:

1. The number of persons suffering from opioid use disorder in the county;
2. The number of overdose deaths that occurred in the county; and

3. The amount of opioids distributed within the county by Morphine Milligram Equivalent.

For Cities/Towns, the formula draws on US Census Bureau data on local government spending by function. The functions or expenditure categories examined for each jurisdiction were: elementary and secondary education net of capital outlay, public welfare (including child protective services), hospitals net of capital outlay, health, police protection, fire protection, corrections net of capital outlay, housing and community development, and judicial and legal.

All Alabama Litigating Local Governments eligible to participate in the WASA were assigned an allocation amount using the allocation model referenced above and the \$22,179,649.34 for LLGs is hereby allocated as set forth in the attached Exhibit A. If an LLG wishes to object an allocation amount, it must do so **no later than 5:00 pm CDT on May 15, 2023, at which time all LLG allocations will become final.**

B. Payments to Local Governmental Public Health Entities

Net of all applicable administrative fees and expenses and after accounting for the holdback required by §V.C of the WASA, \$5,646,294.43 is available to pay LLGs. For the previously settlement *McKesson-Alabama Settlement Agreement* and the *Janssen-Alabama Settlement Agreement*, the allocation percentages for payments to LGPHEs were determined by an arbitration proceeding that was conducted by the Honorable Sally Shushan, a retired federal magistrate judge on the United States District Court for the Eastern District of Louisiana. The Special Master sees no reason to deviate from the previously arbitrated allocation percentages for the LGPHE's. The allocation percentages and amounts for LGPHEs are attached hereto as Exhibit B. If an LGPHE wishes to object an allocation percentage or amount, it must do so **no later than 5:00 pm CDT on May 15, 2023, at which time all LGPHE allocations percentages and amounts will become final.**

Walmart-Alabama Settlement Summary Chart

Description	Amount	Classified	Percentage
Payable to State	\$3,000,000.00	\$3,000,000.00	6.783%
LLG Holdback	\$0.00	\$0.00	0.000%
Payable to LLGs	\$22,179,649.34	\$27,825,943.77	62.912%
Payable to LGPHEs	\$5,646,294.43		
Payable to MDL Common Benefit	\$2,677,500.00	\$2,677,500.00	6.054%
Payable to State Attorneys' Fees	\$660,000.00	\$660,000.00	1.492%
Payable to Attorney Fee Fund (LLGs)	\$1,730,000.00	\$7,062,750.66	15.968%
Payable to Backstop/Deficiency Fund (LLGs)	\$5,332,750.66		
Payable to Attorney Fee Fund (LGPHEs)	\$432,500.00	\$1,785,000.00	4.036%
Payable to Backstop/Deficiency Fund (LGPHEs)	\$1,352,500.00		
Payable to Alabama LG Committee Fee Fund	\$1,128,805.57	\$1,128,805.57	2.552%
Payable to Special Master and Receiver	\$90,000.00	\$90,000.00	0.203%
TOTAL	\$44,230,000.00	\$44,230,000.00	100.000%

IT IS SO ORDERED:**SPECIAL MASTER****Joseph C. Tann, ESQ**

Exhibit A

***Walmart-Alabama
Litigating Local Governments Allocations
& Walmart-Alabama
Litigating Governmental Public Health Entities Allocations***

\$22,179,649.34

Litigating Local Government	Net Allocation to LLG
Abbeville	\$14,771.10
Alabaster	\$143,316.32
Albertville	\$82,670.95
Alexander City	\$85,278.13
Anniston	\$220,197.53
Arab	\$52,916.31
Argo	\$6,581.35
Ashland	\$10,731.28
Ashville	\$4,945.93
Athens	\$96,165.93
Attalla	\$45,227.79
Auburn	\$135,744.63
<i>Autauga County</i>	\$69,265.03
<i>Baldwin County</i>	\$404,167.25
<i>Barbour County</i>	\$20,004.51
Bay Minette	\$34,675.88
Berry	\$5,663.99
Bessemer	\$165,098.80
<i>Bibb County</i>	\$90,454.88
Birmingham	\$1,150,296.09
<i>Blount County</i>	\$204,465.45
Boaz	\$45,614.74
Brent	\$17,135.31

Brewton	\$60,836.83
Bridgeport	\$415.92
Brookwood	\$1,915.03
Brundidge	\$2,996.02
<i>Bullock County</i>	\$17,644.99
Butler	\$22,550.83
<i>Butler County</i>	\$14,772.06
Calera	\$66,854.71
<i>Calhoun County</i>	\$200,688.97
Camp Hill	\$1,669.85
Carbon Hill	\$25,636.44
Cedar Bluff	\$15,741.23
Center Point	\$2,950.11
Centre	\$39,723.94
Centreville	\$6,299.75
<i>Chambers County</i>	\$117,232.30
Chelsea	\$21,676.12
Cherokee	\$2,302.23
<i>Cherokee County</i>	\$83,774.37
Chickasaw	\$22,170.90
Childersburg	\$26,593.12
<i>Chilton County</i>	\$180,977.92
<i>Choctaw County</i>	\$34,569.70
Clanton	\$46,401.62
<i>Clarke County</i>	\$66,010.09
<i>Clay County</i>	\$45,518.80
<i>Cleburne County</i>	\$56,396.57
Cleveland	\$3,504.42
<i>Coffee County</i>	\$85,710.61
<i>Colbert County</i>	\$87,523.91
Columbiana	\$13,763.44

<i>Conecuh County</i>	\$42,459.29
<i>Coosa County</i>	\$33,479.02
Cordova	\$26,289.11
<i>Covington County</i>	\$125,608.58
<i>Crenshaw County</i>	\$39,520.82
Cullman	\$147,884.07
<i>Cullman County</i>	\$246,528.22
Dadeville	\$6,647.91
<i>Dale County</i>	\$66,858.01
Daleville	\$21,311.88
<i>Dallas County</i>	\$56,859.07
Daphne	\$88,324.19
Dauphin Island	\$12,679.11
<i>De Kalb County</i>	\$110,122.63
Decatur	\$517,825.02
Demopolis	\$40,228.05
Dora	\$25,401.48
Dothan	\$299,724.76
Double Springs	\$22,061.28
Douglas	\$267.41
East Brewton	\$7,303.47
<i>Elmore County</i>	\$152,967.72
Enterprise	\$91,391.40
<i>Escambia County</i>	\$179,133.75
<i>Etowah County</i>	\$282,670.49
Eufaula	\$58,441.80
Evergreen	\$11,394.74
Fairfield	\$32,160.77
Fairhope	\$61,379.68
Faunsdale	\$75.78
<i>Fayette County</i>	\$38,147.55

Fayette	\$21,669.09
Florence	\$251,050.31
Foley	\$94,546.35
Fort Deposit	\$1,418.68
Fort Payne	\$160,019.59
Franklin County	\$79,191.62
Fultondale	\$26,199.41
Gadsden	\$229,959.31
Gardendale	\$45,618.95
Geneva	\$18,250.65
Geneva County	\$60,667.52
Georgiana	\$5,039.97
Geraldine	\$3,027.16
Gilbertown	\$554.10
Grant	\$4,679.74
Graysville	\$10,126.66
Greene County	\$19,390.32
Greensboro	\$6,860.44
Greenville	\$47,046.75
Guin	\$6,969.73
Gulf Shores	\$134,110.17
Guntersville	\$69,875.21
Gurley	\$2,066.34
Hale County	\$36,257.72
Haleyville	\$39,200.58
Hamilton	\$24,829.69
Hammondville	\$1,347.86
Hartselle	\$17,479.48
Headland	\$17,260.60
Helena	\$38,322.24
Henagar	\$9,435.02

<i>Henry County</i>	\$22,362.12
Homewood	\$112,622.75
Hoover	\$399,294.94
<i>Houston County</i>	\$153,587.93
Hueytown	\$53,453.52
Huntsville	\$876,702.53
Irondale	\$48,885.22
<i>Jackson County</i>	\$43,456.30
Jacksonville	\$68,751.52
Jasper	\$387,559.40
<i>Jefferson County</i>	\$1,514,091.53
Killen	\$5,039.35
<i>Lamar County</i>	\$44,754.76
Lanett	\$35,187.40
<i>Lauderdale County</i>	\$134,737.89
<i>Lawrence County</i>	\$124,688.37
<i>Lee County</i>	\$79,609.26
Leeds	\$41,213.90
Leesburg	\$5,274.56
Leighton	\$1,552.35
Level Plains	\$963.79
<i>Limestone County</i>	\$159,960.51
Lincoln	\$50,763.52
Linden	\$4,722.80
Locust Fork	\$1,074.35
Louisville	\$1,273.28
<i>Lowndes County</i>	\$19,082.01
Loxley	\$11,307.54
Luverne	\$4,212.15
<i>Macon County</i>	\$37,517.45
<i>Madison County</i>	\$360,773.45

Madison	\$129,444.73
<i>Marengo County</i>	\$13,690.23
Marion	\$6,474.54
<i>Marion County</i>	\$61,293.89
<i>Marshall County</i>	\$203,873.11
McKenzie	\$1,211.08
Midfield	\$107.00
Millbrook	\$68,049.01
Mobile	\$887,257.34
<i>Mobile County</i>	\$758,781.80
<i>Monroe County</i>	\$51,751.94
Monroeville	\$29,193.00
Montgomery	\$488,568.87
<i>Montgomery County</i>	\$269,492.94
Moody	\$9,953.31
<i>Morgan County</i>	\$86,246.41
Moulton	\$37,238.09
Mountain Brook	\$98,010.85
Munford	\$6,646.77
Muscle Shoals	\$73,750.04
Nauvoo	\$5,142.02
New Hope	\$3,595.43
Northport	\$116,603.02
Oakman	\$11,517.83
Oneonta	\$74,334.46
Opelika	\$147,506.50
Opp	\$25,470.21
Orange Beach	\$80,866.33
Oxford	\$96,868.68
Ozark	\$81,093.71
Parrish	\$32,125.41

Pelham	\$188,960.84
Pell City	\$122,173.71
<i>Perry County</i>	\$13,986.59
Phenix City	\$172,071.54
<i>Pickens County</i>	\$78,791.37
Piedmont	\$39,444.49
<i>Pike County</i>	\$8,168.85
Pike Road	\$3,184.86
Pleasant Grove	\$14,207.90
Powell	\$1,458.33
Prattville	\$165,850.46
Priceville	\$3,347.41
Prichard	\$30,249.45
Ragland	\$4,177.92
Rainbow City	\$37,001.76
Rainsville	\$51,726.86
<i>Randolph County</i>	\$48,789.43
Red Bay	\$17,248.94
Roanoke	\$29,986.25
Robertsdale	\$23,543.64
Rockford	\$1,618.05
<i>Russell County</i>	\$46,836.24
Russellville	\$87,115.83
Saraland	\$68,306.85
Satsuma	\$17,209.52
Scottsboro	\$182,410.88
Selma	\$72,559.95
Semmes	\$11,547.06
Sheffield	\$44,242.13
<i>Shelby County</i>	\$450,155.64
Sipsey	\$10,332.80

Slocumb	\$12,161.57
Spanish Fort	\$8,081.17
Springville	\$15,892.52
<i>St Clair County</i>	\$285,310.08
Sumiton	\$63,938.05
Summerdale	\$6,735.93
<i>Sumter County</i>	\$32,476.01
Sweet Water	\$82.48
Sylacauga	\$63,457.82
Talladega	\$62,732.82
<i>Talladega County</i>	\$141,808.68
<i>Tallapoosa County</i>	\$53,523.17
Tarrant	\$25,289.91
Thomasville	\$24,335.46
Troy	\$90,232.18
Trussville	\$67,207.81
Tuscaloosa	\$536,390.42
<i>Tuscaloosa County</i>	\$278,331.48
Tuscumbia	\$23,180.10
Tuskegee	\$25,233.35
Union Springs	\$11,630.73
Uniontown	\$4,988.09
Vance	\$2,647.09
Vernon	\$8,716.79
Vestavia Hills	\$84,767.84
<i>Walker County</i>	\$402,341.71
<i>Washington County</i>	\$44,353.30
Weaver	\$11,621.76
West Blocton	\$11,119.05
Wetumpka	\$45,636.30
<i>Wilcox County</i>	\$24,166.59

Winfield	\$52,296.50
Winston County	\$42,859.32
Woodville	\$126.80
Yellow Bluff	\$805.66

\$5,646,294.43

Litigating Governmental Public Health Entities	Net Allocation to LGPHE
Bibb County Healthcare Authority d/b/a Bibb Medical Center	\$148,872.77
Dale County Healthcare Authority d/b/a Dale Medical Center	\$84,933.82
DCH Health Care Authority (Tuscaloosa) (d/b/a DCH Regional Medical Center and Northport Medical Center	\$578,313.45
Escambia County Health Care Authority d/b/a D.W. McMillan Memorial Hospital and Atmore Community Hospital	\$43,898.38
Geneva County Health Care Authority d/b/a Wiregrass Medical Center	\$138,375.33
Health Care Authority of Clarke County d/b/a Grove Hill Memorial Hospital	\$28,629.38
Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Baptist Medical Center East (Montgomery)	\$175,593.52
Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Baptist Medical Center South (Montgomery)	\$369,318.99

Healthcare Authority for Baptist Health, an affiliate of UAB Health System d/b/a Prattville Baptist Hospital	\$52,487.19
Lakeland Community Hospital HCA Winston County	\$55,350.13
Medical West Hospital Authority (UAB)	\$236,669.53
Monroe County Health Care Authority d/b/a Monroe County Hospital	\$46,761.32
Sylacauga Health Care Authority d/b/a Coosa Valley Medical Center	\$135,512.39
Greene County Health System	\$87,796.76
Tombigbee Health Care Authority d/b/a Brian W. Whitfield Memorial Hospital	\$58,213.07
Attentus Mouton, LLC d/b/a Lawrence Medical Center (Lawrence County Health Care Authority)	\$39,259.88
Cullman Regional Medical Center, Inc. (Healthcare Authority of Cullman County)	\$121,431.73
Decatur Morgan Hospital-Parkway (Health Care Authority of the City of Huntsville)	\$109,562.46
Health Care Authority of the City of Huntsville d/b/a Huntsville Hospital	\$841,804.89
HH Health System-Athens Limestone, LLC d/b/a Athens Limestone Hospital (Healthcare Authority of the City of Huntsville)	\$60,259.35
HH Health System-Morgan, LLC d/b/a Decatur Morgan Hospital Decatur	\$301,296.76
HH Health Systems-Shoals LLC d/b/a Hellen Keller Hospital (Healthcare Authority of the City of Huntsville)	\$157,039.52
HH Health Systems-Shoals, LLC d/b/a Red Bay Hospital (Healthcare Authority of the City of Huntsville)	\$22,825.51
Jackson County Healthcare Authority	\$86,736.95
Marshall County Health Care Authority	\$82,171.84

Marshall County Health Care Authority	\$178,039.00
Jefferson County Board of Health	\$856,468.00
Mobile County Board of Health/FOPHC	\$548,672.50