



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Bureau of Competition
Health Care Division

March 6, 2023

The Honorable Denise Cote
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1910
New York, NY 10007

Re: *FTC, et al. v. Vyera Pharmaceuticals, LLC, et al.*, 1:20-cv-00706 (DLC)

Dear Judge Cote:

In accordance with the Court's order of March 1, 2023 (ECF No. 930), Plaintiffs and Defendant Shkreli jointly submit this letter to advise the Court that Mr. Shkreli intends to comply with the three forms of relief requested by Plaintiffs and outlined in the March 1 Order. Specifically, Mr. Shkreli will:

- (1) By March 13, 2023, submit a revised supplemental Compliance Report that (i) sets forth in detail the manner and form in which he intends to comply, has complied, and is complying with the February 4, 2022 (ECF No. 876) and (ii) provides a full and complete accounting, with supporting documentation, of his assets and of all assets he has transferred, sold or otherwise disposed of in the last 12 months;
- (2) By March 15, 2023, produce in good faith all documents in his possession, custody or control relating to Issues No. 1-8, 14, 16, 18, 21, 23-25, and 28-32 identified in Plaintiffs' October 13, 2022 letter; and
- (3) On either March 21 or 22, 2023, sit for a deposition at the offices of the New York Attorney General at 28 Liberty Street, New York, N.Y. 10005.

Given this agreement, the parties do not believe a hearing is necessary at this time.

Sincerely,

/s/ Markus H. Meier

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