

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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Bonnie Brown <i>et al.</i> ,)	
)	
	Plaintiffs,)	NO. 1:13-cv-01345
v.)	
)	CLASS ACTION
Medicis Pharmaceutical Corporation,)	
)	
	Defendant.)	
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**SECOND NOTICE OF CLASS ACTION, PROPOSED SETTLEMENT AGREEMENT,
AND SETTLEMENT HEARING**

IF YOU ARE FEMALE AND WERE
A FIELD SALES EMPLOYEE
FOR MEDICIS PHARMACUETICAL CORP., OR WORKED
WITH QUINTILES, INNOVEX OR QFR SOLUTIONS FOR MEDICIS
AT ANY TIME BETWEEN APRIL 15, 2008, AND DECEMBER 10, 2012,
A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS.

*A federal court has authorized this Second Notice.
This is not a solicitation from a lawyer.*

Please read this Second Notice carefully and fully.

You may visit www.medicisgendersttlement.com for more information.

I. Summary of Prior Developments

- Seven women, on behalf of themselves and all other current and former women Field Sales Employees employed by Medicis, sued Medicis for sex discrimination. After extensive negotiations, the Plaintiffs and Medicis agreed on the terms of a Settlement.
- On August 5, 2015, the Court preliminarily approved the Settlement. As part of that approval, the Court preliminarily approved the following Class:

All women regularly employed directly by Medicis or by Medicis indirectly through Quintiles, Innovex or QFR Solutions in the Aesthetics Division or Dermatology Division in the following field sales positions at any time from April 15, 2008 up to and including December 10, 2012: Professional Sales Specialist, Senior Sales Specialist, Executive Sales Specialist, Territory Manager, Professional Territory Manager, Senior Territory Manager, Executive Territory Manager, Regional Manager, Senior Regional Manager and Executive Regional Manager. Any women who have previously released sex discrimination claims against Medicis for the entirety of the Class Period during which they were employed directly by Medicis or by Medicis indirectly through Quintiles, Innovex or QFR Solutions, and/or any women who obtained a final judicial determination concerning sex discrimination claims which would otherwise be covered by this Settlement Agreement, are excluded from the definition of the Settlement Class.

- While the Court preliminarily approved the Class to pursue claims for gender discrimination in compensation and promotion, it did not authorize the Class to pursue claims for sexual harassment and hostile work environment at that time.
- Notice describing the terms of the Settlement, the procedures for opting out of the Class, and for objecting to the Settlement were sent to Class Members in August 2015.
- To receive money from the Settlement Fund, Class Members were required to return Claim Forms to the Claims Administrator by no later than November 18, 2015. 99 of 225 Class Members submitted Claim Forms by that date. If you did not submit a Claim Form by that date, you are not eligible to receive a monetary award from the Settlement Fund.

II. New Developments

Based on the information in the Claim Forms, the Court has authorized the preliminarily-certified Class to pursue hostile work environment claims in addition to claims for compensation and promotion.

- The Court will hold a Settlement Hearing to consider whether the Settlement is fair, reasonable, and adequate, and to decide whether to give final approval to this Settlement. The hearing will be held in the courtroom of the Honorable Richard J. Leon at the United States District Court of the District of Columbia, Courtroom 18, U.S. Courthouse, 333 Constitution Avenue, N.W., Washington, DC 20001, on _____, 2016 at __:___.m. If

the Court grants final approval to the Settlement, the Court's judgment will be final and binding.

- You are not required to appear at the hearing. If you are a Class Member, Class Counsel will represent you at no cost to you.
- You are not required to take any action in connection with the Court's authorization to pursue hostile work environment claims. If the Court grants final approval to the Settlement, payment to Class Members will be calculated as described in the August 2015 Notice sent to Class Members.
- Class Counsel are Cyrus Mehri of Mehri & Skalet, PLLC and Sara Wyn Kane of Valli Kane & Vagnini LLP.

III. Future Developments

- On or before _____, 2016, the parties will move for final approval of the Settlement and the proposed Class.
- At the same time, Plaintiffs will ask the Court to approve (a) the proposed formula for allocating the Settlement Fund among the 99 Class Members who timely filed Claim Forms, (b) an award of attorneys' fees and expenses to Class Counsel. Under the terms of the Settlement, Class Counsel may seek attorneys' fees of not more than 35% of the Settlement Fund, plus reimbursement of all reasonable costs including costs for experts, plus a \$150,000 payment for fees on the one year anniversary of final approval for work associated with implementing the Settlement Agreement, plus any interest earned on those amounts until the dates of disbursement to Class Counsel.

IV. Additional Information

- For additional information, you may visit www.medicisgendersettlement.com, or you may contact Class Counsel as follows:

Cyrus Mehri
Mehri & Skalet, PLLC
202-822-5100
cmehri@findjustice.com

Sara Wyn Kane
Valli Kane & Vagnini LLP
516-203-7180
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PLEASE DO NOT CALL OR CONTACT THE COURT, THE OFFICE OF THE CLERK OF COURT, MEDICIS OR VALEANT WITH QUESTIONS REGARDING THIS NOTICE.

Dated: _____, 2016

The Honorable Richard J. Leon
United States District Court Judge
United States District Court for the
District of Columbia