

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HQ SPECIALTY PHARMA CORP. and)	
WG CRITICAL CARE, LLC,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 23-1135 (MN)
)	
AMNEAL PHARMACEUTICALS LLC,)	
)	
Defendant.)	

STIPULATION AND CONSENT JUDGMENT

WHEREAS Plaintiffs HQ Specialty Pharma Corp. and WG Critical Care, LLC (collectively, “Plaintiffs”) brought this suit against Defendant Amneal Pharmaceuticals LLC (“Defendant”) asserting infringement of U.S. Patent No. 10,130,646 (the “‘646 Patent”);

IT IS HEREBY STIPULATED by Plaintiffs and Defendant, subject to approval of this Court:

1. All claims and counterclaims between Plaintiffs and Defendant are dismissed without prejudice.
2. Each party shall bear its own costs, attorneys’ fees and expenses incurred in connection with the claims and counterclaims dismissed by this Order.
3. Defendant is enjoined from making, having made, importing, using, offering for sale, or selling terminally sterilized Calcium Gluconate in sodium chloride injection bag products (the “Amneal Products”) in the United States during the term of the ‘646 Patent, unless licensed by Plaintiffs.
4. Plaintiffs’ claims for damages based on the sales of the Amneal Products prior to August 8, 2025 are hereby waived.

5. The Court retains jurisdiction over the parties to this action for purposes of enforcing this Stipulation and Consent Judgment.

6. This Stipulation and Consent Judgment shall not act as an adjudication on the merits.

7. The Clerk of the Court is directed to enter this Stipulation and Consent Judgment forthwith.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Megan E. Dellinger

Megan E. Dellinger (#5739)
Cameron P. Clark (#6647)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
mdellinger@morrisnichols.com
cclark@morrisnichols.com

*Attorneys for Plaintiffs HQ Specialty Pharma Corp
and WG Critical Care, LLC*

YOUNG CONAWAY STARGATT & TAYLOR, LLP

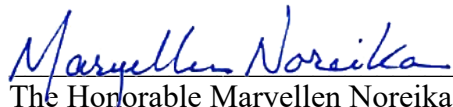
/s/ Anne Shea Gaza

Anne Shea Gaza (#4093)
Samantha G. Wilson (#5816)
Daniel G. Mackrides (#7230)
Rodney Square
1000 North King Street
Wilmington, DE 19801
(302) 571-6600
agaza@ycst.com
swilson@ycst.com
dmackrides@ycst.com

*Attorneys for Defendant Amneal
Pharmaceuticals LLC*

August 8, 2025

SO ORDERED this 12th day of August 2025.


The Honorable Maryellen Noreika
United States District Judge