

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

**NORTH SHORE HEMATOLOGY and
ONCOLOGY ASSOCIATES, P.C., on behalf of
itself and all others similarly situated,**

Plaintiff,

v.

BRISTOL-MYERS SQUIBB CO.,

Defendant.

Civil Action No. 1:04cv248 (EGS)

**NOTICE OF PROPOSED SETTLEMENT
OF CLASS ACTION AND HEARING REGARDING SETTLEMENT**

TO: All persons and entities in the United States who purchased Platinol® directly from Bristol-Myers Squibb Company or its wholly-owned subsidiary, Oncology Therapeutic Network, Inc., at any time from June 19, 1999 through September 8, 2004 (the “Direct Purchaser Class” or “Class”). Excluded from the Class are Bristol-Myers Squibb Company, its parents, employees, subsidiaries, and affiliates, and government entities.

YOU ARE HEREBY NOTIFIED, pursuant to an Order of the United States District Court for the District of Columbia, that a hearing will be held on November 30, 2004 at 11:00 a.m. before the Hon. Emmet G. Sullivan, United States District Judge, in Courtroom No. 1, United States Courthouse, located at 333 Constitution Avenue, N.W., Washington, D.C. 20001. The hearing will be held for the purpose of determining whether the proposed settlement of the above-captioned litigation consisting of a cash payment in the amount of \$50 million for the benefit of the certified class of all persons or entities in the United States who purchased Platinol® directly from Bristol-Myers Squibb Company or its wholly-owned subsidiary, Oncology Therapeutic Network, Inc., from June 19, 1999 through September 8, 2004, in accordance with the terms and conditions of a Settlement Agreement between the Lead Plaintiff and Bristol-Myers Squibb Company, dated September 10, 2004 and amended on September 13, 2004 (the “Settlement Agreement”), on file with the Court, should be approved by the Court as fair, reasonable, and adequate to the Class, and whether the above-captioned litigation should be dismissed on the merits and with prejudice as against Bristol-Myers Squibb Company, as provided in the Settlement Agreement. Lead Counsel intend to make a request for an award of attorneys’ fees, an incentive award for the Lead Plaintiff, and reimbursement of costs and expenses incurred in connection with the litigation and the finalization and administration of the Settlement Agreement.

Your rights may be affected by this litigation and its settlement if you purchased Platinol® directly from Bristol-Myers Squibb Company or its wholly-owned subsidiary, Oncology Therapeutic Network, Inc., from June 19, 1999 through September 8, 2004.

If you have not received a printed Notice of Platinol® Direct Purchaser Antitrust Litigation Class Settlement and Hearing (“Notice”), you may obtain a copy by writing to ***Platinol® Direct Purchaser Settlement Administrator, c/o Complete Claim Solutions, Inc., P.O. Box 24775, West Palm Beach, FL 33416, (800) 930-0057.*** The Notice contains further information regarding the proposed Settlement with Bristol-Myers Squibb Company and the rights of Platinol® Direct Purchaser Class Members with respect thereto.

**PLEASE DO NOT CONTACT THE COURT OR THE CLERK'S OFFICE REGARDING
THIS NOTICE.**

Dated: September 21, 2004

Hon. Emmet G. Sullivan
United States District Judge
Washington, D.C.