

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

In re QUESTCOR PHARMACEUTICALS, INC.)
SECURITIES LITIGATION) Case No. CV-12-01623-DMG(JPRx)
_____))
This Document Relates To:) CLASS ACTION
ALL ACTIONS.)
_____)

NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION

If you purchased or otherwise acquired the common stock of Questcor Pharmaceuticals, Inc. ("Questcor" or the "Company")¹ during the period from April 4, 2011 through September 21, 2012, inclusive (the "Class Period"), and are not otherwise excluded from the Class (see Question 6 below), you could get a payment from a class action settlement.

A federal court authorized this Notice. This is not a solicitation from a lawyer. Your legal rights may be affected whether you act or do not act. Read this Notice carefully.

Security and Time Period: Purchases or acquisitions of Questcor common stock between April 4, 2011 and September 21, 2012, inclusive.

Settlement Fund: \$38,000,000 in cash plus any interest earned. Your recovery will depend on the timing of your purchases, acquisitions and/or sales of Questcor common stock during the Class Period. Based on the information currently available to Plaintiffs and the analysis performed by their damages consultant, it is estimated that if Class Members submit claims for 100% of the shares eligible for distribution under the Plan of Allocation (described below), the estimated average distribution per share of common stock will be approximately \$0.87 before deduction of Court-approved fees and expenses, including the cost of notifying Members of the Class and settlement administration and any attorneys' fees and expenses awarded by the Court to Lead Counsel and any award to Plaintiffs for their representation of the Class. Historically, actual claims rates are less than 100%, which result in higher distributions per share. A Class Member's actual recovery will be a proportion of the Net Settlement Fund determined by that claimant's recognized claim as compared to the total recognized claims of all Class Members who submit valid Proof of Claim and Release forms ("Proof of Claim").

Reasons for Settlement: Avoids the costs and risks associated with continued litigation, including the danger of no recovery.

Plaintiffs believe that the claims asserted in the Litigation have merit and that the facts developed to date support the claims asserted. Plaintiffs and their counsel believe that the Settlement provides the Class with a substantial benefit now in lieu of engaging in further litigation, with the risk of no recovery.

Defendants have denied and continue to deny, *inter alia*, that Plaintiffs and the Class have suffered damages, that Defendants or any of them made or caused to be made any alleged material misrepresentation or omission, and that any Defendant acted with scienter in making or causing any alleged misrepresentation or omission. Nonetheless, Defendants have concluded that further conduct of the Litigation could be protracted and expensive, and that it is desirable that the Litigation be fully and finally settled in the manner and upon the terms and conditions set forth in the parties' Stipulation. Defendants also have taken into account the uncertainty and risks inherent in any litigation, especially in complex cases like this Litigation.

If the Case Had Not Settled: Continuing with the case could have resulted in Plaintiffs' claims being dismissed, at summary judgment, trial, or on appeal. The two sides vigorously disagree on both liability and the amount of money that could have been won if Plaintiffs prevailed at trial. The parties disagree, among other issues, about: (1) whether any Defendant made a false statement; (2) whether any Defendant knew any alleged false statement was false when made; (3) the method for determining whether the price of Questcor common stock was artificially inflated during the relevant period; (4) whether there was any such inflation and the amount of any such alleged inflation; (5) whether there was any wrongdoing on the part of any Defendant; (6) the extent that various facts alleged by Plaintiffs influenced the trading price of Questcor common stock during the Class Period; and (7) whether any allegedly false or misleading statement or omission was material under the federal securities laws.

Attorneys' Fees and Expenses: Court-appointed Lead Counsel will ask the Court for attorneys' fees not to exceed 27.5% of the Settlement Fund and expenses not to exceed \$675,000 to be paid from the Settlement Fund plus interest. Plaintiffs may also apply for their time and expenses in representing the Class in an amount not to exceed \$10,000 in the

¹ This Notice incorporates by reference the definitions in the Stipulation of Settlement dated as of April 8, 2015 ("Stipulation"), and all capitalized terms used, but not defined herein, shall have the same meanings as in the Stipulation. The Stipulation can be obtained at www.questcorsecuritieslitigation.com.

aggregate. Lead Counsel have not received any payment for their work investigating the facts, prosecuting this Litigation, and negotiating this settlement on behalf of the Plaintiffs and the Class. If the above amounts are requested by Lead Counsel and approved by the Court, the average cost per share of common stock will be approximately \$0.26.

More Information: www.questcorsecuritieslitigation.com or

Claims Administrator:
Questcor Securities Litigation
c/o Gilardi & Co. LLC
P.O. Box 8040
San Rafael, CA 94912-8040
1-888-564-2634

Representative of Lead Counsel:
Rick Nelson
Shareholder Relations
Robbins Geller Rudman & Dowd LLP
655 West Broadway, Suite 1900
San Diego, CA 92101
1-800-449-4900

- Your legal rights are affected whether you act or do not act. Read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

SUBMIT A CLAIM FORM

The only way to get a payment. Proofs of Claim must be mailed or submitted online on or before September 2, 2015.

EXCLUDE YOURSELF

Get no payment. Unless you exclude yourself from the Class, you will be unable to pursue any claims against the Defendants or any other Released Person related to the wrongdoing alleged in this lawsuit. Exclusions must be postmarked on or before August 21, 2015.

OBJECT

You may write to the Court if you have any objection to the settlement, the request for attorneys' fees and expenses, the requested award to Plaintiffs for their time and expenses in representing the Class, or the Plan of Allocation. Objections must be received by counsel and the Claims Administrator on or before August 21, 2015.

GO TO THE SETTLEMENT HEARING

You may ask to speak in Court about the fairness of the settlement. Requests to speak must be received by counsel and the Claims Administrator on or before August 21, 2015. The Court hearing on the settlement, Plan of Allocation, and Lead Counsel's request for an award of attorneys' fees and expenses is scheduled for September 18, 2015, at 10:00 a.m.²

DO NOTHING

Get no payment. Give up your rights.

- These rights and options — **and the deadlines to exercise them** — are explained in this Notice.
- The Court in charge of this case must decide whether to approve the settlement. Payments will be made if the Court approves the settlement and, if there are any appeals, after appeals are resolved. Please be patient.

BASIC INFORMATION

1. Why did I get this notice package?

You or someone in your family may have purchased or otherwise acquired Questcor common stock between April 4, 2011 and September 21, 2012, inclusive.

The Court directed that you be sent this Notice because you have a right to know about a settlement of a class action lawsuit, and about all of your options, before the Court decides whether to approve the settlement. If the Court approves it and after any objections or appeals (if there are any) are resolved, the Claims Administrator appointed by the Court will make the payments that the settlement allows.

This package explains the lawsuit, the settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of the case is the United States District Court for the Central District of California, Western Division (the "Court"), and the case is known as *In re Questcor Pharmaceuticals, Inc. Securities Litigation*, Case No. CV-12-01623-DMG(JPRx). The entities and person that led the Litigation, West Virginia Investment Management Board, Plumbers & Pipefitters National Pension Fund and Steven Glucksberg are called Plaintiffs and Questcor and the individuals they sued are called Defendants.³

² The date and/or time of the Court hearing on the fairness of the settlement may change without further notice to the Class. If you plan on attending the Court hearing, please check the website, www.questcorsecuritieslitigation.com or call Rick Nelson, Shareholder Relations representative of Lead Counsel at 1-800-449-4900 to confirm that the date and/or time has not changed.

³ The Individual Defendants in this Litigation are Don M. Bailey ("Bailey"), Michael H. Mulroy ("Mulroy"), Stephen L. Cartt ("Cartt"), and David Young ("Young").

2. What is this lawsuit about?

On March 5, 2013, Plaintiffs filed the Consolidated Class Action Complaint for Violation of the Federal Securities Laws (“Complaint”) against Defendants Questcor, Bailey, Mulroy, Cartt, Young, David J. Medeiros and Mitchell J. Blutt. Plaintiffs alleged, among other things, that throughout the Class Period, Defendants issued false and misleading statements about the effectiveness of, and prospects for, Questcor’s sole product, Acthar, while simultaneously using Questcor’s cash to prop up the price of Questcor shares through the purchase of hundreds of millions of dollars of Questcor stock in the open market. As a result, Questcor’s stock traded at artificially inflated prices. On May 6, 2013, all Defendants moved to dismiss the Complaint. Defendants asserted, among other things, that Plaintiffs failed to plead the elements of falsity, scienter, and loss causation under the pleading standards set forth in the Federal Rules of Civil Procedure and the Private Securities Litigation Reform Act of 1995 (“PSLRA”). After full briefing by all parties, the Court held a hearing on September 13, 2013, and issued its order granting in part and denying in part the motions to dismiss (the “Order”). In the Order, the Court dismissed individual defendants David J. Medeiros and Mitchell J. Blutt, as well as allegations related to misstatements by Questcor about its compliance with regulations and industry standards. The Court denied all other aspects of Defendants’ motions to dismiss. Thereafter, Defendants filed answers denying all allegations in the Complaint and asserting defenses thereto.

Following the ruling on Defendants’ motions to dismiss, the Settling Parties began formal discovery. The Settling Parties served written discovery on each other, and issued subpoenas to third parties. By the close of fact discovery in January 2015, Plaintiffs had collected over 1.6 million pages of documents from, and took 26 depositions of, Defendants and various current and former Questcor employees, prescribing doctors and other third parties. Similarly, Defendants collected over 200,000 pages of documents from Plaintiffs, their investment managers and other third parties and took six total depositions.

In the course of the Litigation, the Settling Parties engaged the services of the Honorable Layn R. Phillips (Ret.), a nationally recognized mediator. The Settling Parties engaged in an in-person mediation session with Judge Phillips, on September 8, 2014. While the Settling Parties did not reach an agreement to settle the Litigation at the mediation, the Settling Parties continued settlement negotiations with the assistance of Judge Phillips. These efforts culminated with the Settling Parties agreeing to settle the Litigation for \$38,000,000, pursuant to a mediator’s proposal by Judge Phillips which was separately accepted by the Settling Parties.

3. Why is this a class action?

In a class action, one or more people called Class Representatives (in this case, Plaintiffs West Virginia Investment Management Board, Plumbers & Pipefitters National Pension Fund and Steven Glucksberg) sue on behalf of people who have similar claims. All of these people and/or entities are called a Class or Class Members. One judge – in this case, United States District Judge Dolly M. Gee – resolves the issues for all Class Members, except for those who exclude themselves from the Class.

4. Why is there a settlement?

The Court did not decide in favor of Plaintiffs or Defendants. Instead, with the assistance of a highly respected mediator, the lawyers for both sides of the lawsuit have negotiated a settlement that they believe is in the best interests of their respective clients. The settlement allows both sides to avoid the risks and cost of lengthy and uncertain litigation and the uncertainty of a trial and appeals, and permits Class Members to be compensated without further delay. Plaintiffs and their attorneys think the settlement is best for all Class Members. Defendants have denied and continue to deny each and all of the claims alleged by Plaintiffs and the Class in the Litigation, but have concluded that further defense of the Litigation would be protracted and expensive, and that it is desirable that the Litigation be fully and finally settled in the manner and upon the terms and conditions set forth in the Stipulation. Defendants have also taken into account the uncertainty and risks inherent in any litigation, especially in complex cases such as this Litigation.

WHO GETS MONEY FROM THE SETTLEMENT

To see if you will get money from this settlement, you first have to determine if you are a Class Member.

5. How do I know if I am part of the settlement?

The Class includes ***all persons who purchased or otherwise acquired Questcor common stock between April 4, 2011 and September 21, 2012, inclusive.***

6. Are there exceptions to being included in the Class?

Yes. Excluded from the Class are current and former defendants; members of the immediate family of any current or former defendants; directors, officers, subsidiaries and affiliates of Questcor; any person, firm, trust, corporation, officer, director or other individual or entity in which any current or former defendant has a controlling interest; and the legal representatives, affiliates, heirs, successors-in-interest or assigns of any such excluded party. Also excluded from the Class are those Persons who timely and validly request exclusion from the Class.

7. I’m still not sure if I am included.

If you still are not sure whether you are included, you can ask for free help. You can call 1-888-564-2634; visit www.questcorsecuritieslitigation.com; or call Rick Nelson at 1-800-449-4900 for more information.

THE SETTLEMENT BENEFITS – WHAT YOU GET

8. What does the settlement provide?

Defendants have agreed to pay or cause to be paid \$38,000,000 in cash (the “Settlement Fund”). The Settlement Fund, plus interest earned from the date it is established, less costs, fees, and expenses (the “Net Settlement Fund”), will be divided among all eligible Class Members who send in valid Proofs of Claim (“Authorized Claimants”). Costs, fees, and expenses include Court-approved attorneys’ fees and expenses, and the time and expenses of Plaintiffs approved by the Court; the costs of notifying Class Members, including the costs of printing and mailing this Notice and the cost of publishing newspaper notice; the costs of claims administration; and taxes on the Settlement Fund.

9. How much will my payment be?

Your share of the Net Settlement Fund will depend on the number of valid Proofs of Claim that Class Members submit and how many shares of Questcor common stock you purchased or otherwise acquired during the relevant period and when you bought and sold them.

For purposes of determining the amount an Authorized Claimant may recover under the Plan of Allocation, Lead Counsel conferred with their damages consultant. The Plan of Allocation reflects a fair and reasonable method to allocate the settlement proceeds among Authorized Claimants.

In the unlikely event there are sufficient funds in the Net Settlement Fund, each Authorized Claimant will receive an amount equal to the Authorized Claimant’s claim, as defined below. If, however, the amount in the Net Settlement Fund is not sufficient to permit payment of the total claim of each Authorized Claimant, then each Authorized Claimant shall be paid the percentage of the Net Settlement Fund that each Authorized Claimant’s claim bears to the total of the claims of all Authorized Claimants. Payment in this manner shall be deemed conclusive against all Authorized Claimants.

The calculation of claims below is not an estimate of the amount you will receive. It is a formula for allocating the Net Settlement Fund among all Authorized Claimants.⁴

Class Period: April 4, 2011 – September 21, 2012

1. For shares of Questcor common stock ***purchased or otherwise acquired on or between April 4, 2011 through September 18, 2012***, the claim per share shall be as follows:
 - a) If sold on or between April 4, 2011 through September 18, 2012, the claim per share shall be the lesser of (i) the purchase price times the percent inflation in Table A less the sales price times the percent inflation in Table A; and (ii) the difference between the purchase price and the sales price.
 - b) If retained at the end of September 18, 2012 and sold before December 17, 2012, the claim per share shall be the lesser of (i) the inflation in Table A at the time of purchase; (ii) the difference between the purchase price and the sales price; and (iii) the difference between the purchase price and the average closing price up to the date of sale as set forth in Table B below.
 - c) If retained at the end of December 16, 2012, or sold thereafter, the claim per share shall be the lesser of (i) the purchase price times the percent inflation in Table A; (ii) the difference between the purchase price and the sales price; and (iii) the difference between the purchase price and \$24.57 per share.
2. For shares of Questcor common stock ***purchased or otherwise acquired on or between September 19, 2012 through September 21, 2012***, the claim per share shall be zero.

TABLE A

Period		Inflation as Percent of Price
Begin	End	
4/4/2011	1/11/2012	65.2%
1/12/2012	7/10/2012	59.0%
7/11/2012	9/18/2012	48.0%
9/19/2012	9/21/2012	0%

⁴ If any of the formulas set forth below yield an amount less than \$0.00, the claim per share is \$0.00.

TABLE B

Date	Closing Price	Average Closing Price	Date	Closing Price	Average Closing Price
19-Sep-12	\$26.35	\$26.35	5-Nov-12	\$24.14	\$22.95
20-Sep-12	\$30.33	\$28.34	6-Nov-12	\$24.96	\$23.02
21-Sep-12	\$30.13	\$28.94	7-Nov-12	\$25.39	\$23.09
24-Sep-12	\$19.08	\$26.47	8-Nov-12	\$25.87	\$23.16
25-Sep-12	\$19.29	\$25.04	9-Nov-12	\$25.05	\$23.22
26-Sep-12	\$18.24	\$23.90	12-Nov-12	\$25.36	\$23.27
27-Sep-12	\$17.83	\$23.04	13-Nov-12	\$25.70	\$23.34
28-Sep-12	\$18.47	\$22.47	14-Nov-12	\$25.29	\$23.39
1-Oct-12	\$19.01	\$22.08	15-Nov-12	\$25.06	\$23.43
2-Oct-12	\$19.55	\$21.83	16-Nov-12	\$24.78	\$23.46
3-Oct-12	\$19.41	\$21.61	19-Nov-12	\$24.63	\$23.49
4-Oct-12	\$19.36	\$21.42	20-Nov-12	\$25.64	\$23.54
5-Oct-12	\$19.40	\$21.27	21-Nov-12	\$25.71	\$23.59
8-Oct-12	\$20.29	\$21.20	23-Nov-12	\$26.39	\$23.65
9-Oct-12	\$20.96	\$21.18	26-Nov-12	\$27.84	\$23.74
10-Oct-12	\$20.36	\$21.13	27-Nov-12	\$27.66	\$23.83
11-Oct-12	\$21.04	\$21.12	28-Nov-12	\$27.50	\$23.90
12-Oct-12	\$22.01	\$21.17	29-Nov-12	\$28.17	\$23.99
15-Oct-12	\$23.18	\$21.28	30-Nov-12	\$25.90	\$24.03
16-Oct-12	\$24.88	\$21.46	3-Dec-12	\$25.66	\$24.06
17-Oct-12	\$25.30	\$21.64	4-Dec-12	\$26.31	\$24.10
18-Oct-12	\$25.76	\$21.83	5-Dec-12	\$25.61	\$24.13
19-Oct-12	\$24.99	\$21.97	6-Dec-12	\$26.41	\$24.17
22-Oct-12	\$26.26	\$22.15	7-Dec-12	\$26.83	\$24.22
23-Oct-12	\$25.93	\$22.30	10-Dec-12	\$27.14	\$24.28
24-Oct-12	\$25.92	\$22.44	11-Dec-12	\$27.68	\$24.33
25-Oct-12	\$26.17	\$22.57	12-Dec-12	\$27.65	\$24.39
26-Oct-12	\$26.17	\$22.70	13-Dec-12	\$27.37	\$24.44
31-Oct-12	\$25.48	\$22.80	14-Dec-12	\$27.75	\$24.50
1-Nov-12	\$25.45	\$22.89	17-Dec-12	\$28.81	\$24.57
2-Nov-12	\$23.80	\$22.92			

For Class Members who held Questcor common stock at the beginning of the Class Period or made multiple purchases, acquisitions, or sales during the Class Period, the first-in, first-out (“FIFO”) method will be applied to such holdings, purchases, acquisitions, and sales for purposes of calculating a claim. Under the FIFO method, sales of Questcor common stock during the Class Period will be matched in chronological order, first against common stock held at the beginning of the Class Period. The remaining sales of Questcor common stock during the Class Period will then be matched, in chronological order, against Questcor common stock purchased or acquired during the Class Period.

An Authorized Claimant will be eligible to receive a distribution from the Net Settlement Fund only if a Class Member had a net loss, after all profits from transactions in Questcor common stock during the Class Period are subtracted from all losses. However, the proceeds from sales of Questcor common stock which have been matched against Questcor common stock held at the beginning of the Class Period will not be used in the calculation of such net loss.

The Court has reserved jurisdiction to allow, disallow, or adjust the claim of any Class Member on equitable grounds.

Payment pursuant to the Plan of Allocation set forth above shall be conclusive against all Authorized Claimants. No Person shall have any claim against Plaintiffs, any counsel for Plaintiffs, any claims administrator or other Person designated by Lead Counsel, Defendants, the Related Parties, the Released Persons, or counsel for Defendants based on distributions made substantially in accordance with the Stipulation and the settlement contained therein, the Plan of Allocation, or further orders of the Court. All Class Members who fail to complete and file a valid and timely Proof of Claim shall be barred from participating in distributions from the Net Settlement Fund (unless otherwise ordered by the Court), but otherwise shall be bound by all of the terms of the Stipulation, including the terms of any judgment entered and the releases given.

HOW YOU GET A PAYMENT – SUBMITTING A CLAIM FORM

10. How will I get a payment?

To qualify for a payment, you must send in a Proof of Claim. A Proof of Claim is enclosed with this Notice or it can be downloaded at www.questcorsecuritieslitigation.com. Read the instructions carefully, fill out the form, include all the documents the form asks for, sign it, and mail it in the enclosed envelope or submit it online no later than September 2, 2015. The claim form may be submitted online at www.questcorsecuritieslitigation.com.

11. When would I get my payment?

The Court will hold a hearing on September 18, 2015, at 10:00 a.m., to decide whether to approve the settlement.⁵ If Judge Gee approves the settlement, there may be appeals. It is always uncertain whether these appeals can be resolved favorably, and resolving them can take time, perhaps more than a year. It also takes time for all the claim forms to be processed. If there are no appeals and depending on the number of claims submitted, the Claims Administrator could distribute the Net Settlement Fund as early as nine months after the fairness hearing. Please be patient.

12. What am I giving up to get a payment or stay in the Class?

Unless you exclude yourself, you are staying in the Class, and that means that you cannot sue, continue to sue, or be part of any other lawsuit against the Defendants about the same issues in this case or about issues that could have been asserted in this case. It also means that all of the Court's orders will apply to you and legally bind you and you will release your Released Claims in this case against Defendants and their Related Parties. "Released Claims" means any and all claims and causes of action of every nature and description whatsoever whether known or unknown, asserted or unasserted, whether arising under federal, state, local, statutory, common, foreign or administrative law, or any other law, rule or regulation, whether fixed or contingent, at law or in equity, whether class or individual in nature, that Plaintiffs, or any other Member of the Class or the representatives, heirs, successors-in-interest and assigns of any of them, asserted in the Litigation or could have asserted, directly or indirectly, in any forum that arise out of or are based upon or related to (i) the purchase or acquisition of Questcor common stock, and (ii) the claims, allegations, transactions, facts, matters, circumstances, or occurrences, representations or omissions involved, set forth, alleged, embraced, encompassed, or otherwise referred to in the Complaint. "Released Claims" includes "Unknown Claims" as defined in ¶1.28 of the Stipulation.

"Related Parties" means each of a Defendant's respective present and former parents, subsidiaries, divisions and affiliates and the respective present and former employees, members, partners, principals, officers, directors, attorneys, advisors, accountants, auditors, and insurers of each of them; and the predecessors, successors, estates, heirs, executors, trusts, trustees, administrators, agents, representatives and assigns of each of them, in their capacity as such.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want a payment from this settlement, but you want to keep the right to sue or continue to sue the Defendants on your own about the same issues in this case, then you must take steps to get out of the Class. This is called excluding yourself or is sometimes referred to as opting out of the Class.

13. How do I get out of the Class?

To exclude yourself from the Class, you must send a letter by mail stating that you want to be excluded from *In re Questcor Pharmaceuticals, Inc. Securities Litigation*, Case No. CV-12-01623-DMG(JPRx). You must sign the letter, and include (a) your name, address, telephone number; and (b) the date, price and number of shares of all of your purchases, acquisitions and sales of Questcor common stock during the Class Period. You must mail your exclusion request postmarked no later than August 21, 2015 to:

Questcor Securities Litigation
Claims Administrator
c/o Gilardi & Co. LLC
P.O. Box 8040
San Rafael, CA 94912-8040

You cannot exclude yourself on the phone or by e-mail. If you ask to be excluded, you are not eligible to get any settlement payment, and you cannot object to the settlement. You will not be legally bound by anything that happens in this lawsuit.

14. If I do not exclude myself, can I sue Defendants for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Defendants or any Released Person for the claims that this settlement resolves. Remember, the exclusion deadline is August 21, 2015.

⁵ The date and/or time of the Court hearing on the fairness of the settlement may change without further notice to the Class. If you plan on attending the Court hearing, please check the website, www.questcorsecuritieslitigation.com or call Rick Nelson, Shareholder Relations representative of Lead Counsel at 1-800-449-4900 to confirm that the date and/or time has not changed.

15. If I exclude myself, can I get money from this settlement?

No. If you exclude yourself, do not send in a Proof of Claim to ask for any money. Once you exclude yourself, you will receive no cash payment even if you also submit a Proof of Claim.

THE LAWYERS REPRESENTING YOU

16. Do I have a lawyer in this case?

The Court appointed the law firm of Robbins Geller Rudman & Dowd LLP to represent you and other Class Members. These lawyers are called Lead Counsel. These lawyers will apply to the Court for payment from the Settlement Fund; you will not otherwise be charged for their work. If you want to be represented by your own lawyer, you may hire one at your own expense.

17. How will the lawyers be paid?

At the fairness hearing, Lead Counsel will request the Court to award attorneys' fees not to exceed 27.5% of the Settlement Fund and expenses not to exceed \$675,000, in connection with the Litigation. Plaintiffs may also request up to \$10,000 in the aggregate for their time and expenses in representing the Class. If awarded, the cost would be approximately \$0.26 per share. This compensation will be paid from the Settlement Fund. Class Members are not personally liable for any such fees or expenses. To date, Lead Counsel have not received any payment for their services in conducting this Litigation on behalf of the Plaintiffs and the Class, nor have counsel been paid for their expenses. The fee requested will compensate Lead Counsel for their work in achieving the Settlement Fund and is well within the range of fees awarded to class counsel under similar circumstances in other cases of this type. The Court may award less than this amount.

OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the settlement, the Plan of Allocation, Lead Counsel's request for an award of attorneys' fees and expenses, or Plaintiffs' expenses.

18. How do I tell the Court that I do not like the settlement?

If you are a Class Member (and you have not excluded yourself), you can object to the settlement, the request for attorneys' fees and expenses, the requested awards to Plaintiffs for their time and expenses in representing the Class, or the Plan of Allocation if you do not like any part of it. The Court can only approve or deny the settlement. You cannot ask the Court to order a larger settlement. If the Court denies the settlement, no settlement payments will be sent out and the lawsuit will continue. You can give reasons why you think the Court should not approve the settlement, the request for attorneys' fees and expenses, the requested awards to Plaintiffs, or the Plan of Allocation. The Court will consider your views. To object, you must submit an objection saying that you object to the proposed settlement in *In re Questcor Pharmaceuticals, Inc. Securities Litigation*, Case No. CV-12-01623-DMG(JPRx). Be sure to include your name, address, telephone number, your signature, the number of shares of Questcor common stock you purchased or otherwise acquired during the period from April 4, 2011 through September 21, 2012, inclusive, and the reasons you object to the settlement, the requested attorneys' fees and expenses, the requested awards to Plaintiffs, and/or the Plan of Allocation. Any such objection must be mailed or delivered such that it is received by each of the following no later than August 21, 2015.

Questcor Securities Litigation
Claims Administrator
c/o Gilardi & Co. LLC
P.O. Box 6002
Larkspur, CA 94977-6002

Counsel for Plaintiffs:

ROBBINS GELLER RUDMAN & DOWD LLP
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655 West Broadway, Suite 1900
San Diego, CA 92101

Counsel for Defendants:

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
PETER B. MORRISON
300 South Grand Avenue
Los Angeles, CA 90071

LATHAM & WATKINS LLP
PETER A. WALD
650 Town Center Drive, 20th Floor
Costa Mesa, CA 92626

19. What is the difference between objecting and excluding myself from the settlement?

Objecting is telling the Court that you do not like something about the proposed settlement. You can object **only** if you stay in the Class. Excluding yourself is telling the Court that you do not want to be part of the Class. If you exclude yourself, you have no basis to object because the case no longer applies to you.

THE COURT'S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the proposed settlement. You may attend, but you do not have to.

20. When and where will the Court decide whether to approve the settlement?

The Court will hold a hearing at 10:00 a.m., on September 18, 2015, at the United States District Court for the Central District of California, Western Division, United States Courthouse, 312 North Spring Street, Courtroom 7, Los Angeles, CA 90012. At this hearing, the Court will consider whether the settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court will listen to people who have asked to speak at the hearing. The Court will also decide whether to approve the payment of attorneys' fees and expenses to Lead Counsel, whether to approve the expenses of Plaintiffs, and whether to approve the Plan of Allocation. We do not know how long the hearing will take or whether the Court will make its decision on the day of the hearing or sometime later.

21. Do I have to come to the hearing?

No. Lead Counsel will answer questions Judge Gee may have. But, you are welcome to come at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but you are not required to do so.

22. May I speak at the hearing?

You may ask the Court for permission to speak at the hearing. To do so, you must send a letter saying that it is your intention to appear in *In re Questcor Pharmaceuticals, Inc. Securities Litigation*, Case No. CV-12-01623-DMG(JPRx). Be sure to include your name, address, telephone number, your signature, and the number of shares of Questcor common stock you purchased or otherwise acquired between April 4, 2011 and September 21, 2012, inclusive. Your notice of intention to appear must be sent to the Claims Administrator and Plaintiffs' and Defendants' counsel at the addresses listed in Question 18 so that it is received on or before August 21, 2015. You cannot speak at the hearing if you exclude yourself from the Class.

IF YOU DO NOTHING

23. What happens if I do nothing at all?

If you do nothing, you will get no money from this settlement. But, unless you exclude yourself, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against the Defendants or the Released Persons about the same issues in this case.

GETTING MORE INFORMATION

24. Are there more details about the settlement?

This Notice summarizes the settlement. For the complete terms and conditions of the settlement, please see the Stipulation available at www.questcorsecuritieslitigation.com. You can also call 1-800-449-4900 or write to a representative of Lead Counsel, Rick Nelson, Shareholder Relations, Robbins Geller Rudman & Dowd LLP, 655 West Broadway, Suite 1900, San Diego, CA 92101 for more information about the settlement or the Litigation. You can also access the Court docket in this case by visiting the office of the Clerk of the Court for the United States District Court for the Central District of California, Western Division, 312 North Spring Street, Room G-8, Los Angeles, CA 90012. **PLEASE DO NOT CALL THE COURT OR THE CLERK OF THE COURT FOR ADDITIONAL INFORMATION ABOUT THE SETTLEMENT OR THE CLAIMS PROCESS.**

25. Special notice to banks, brokers, and other nominees

If you held any Questcor common stock purchased or otherwise acquired between April 4, 2011 and September 21, 2012, inclusive, as a nominee for a beneficial owner, then, within ten (10) days after you receive this Notice, you must either: (1) send a copy of this Notice by First-Class Mail to all such Persons; or (2) provide a list of the names and addresses of such Persons to the Claims Administrator:

Questcor Securities Litigation
Claims Administrator
c/o Gilardi & Co. LLC
P.O. Box 8040
San Rafael, CA 94912-8040

If you choose to mail the Notice and Proof of Claim yourself, you may obtain from the Claims Administrator (without cost to you) as many additional copies of these documents as you will need to complete the mailing.

Regardless of whether you choose to complete the mailing yourself or elect to have the mailing performed for you, you may obtain reimbursement for or advancement of reasonable administrative costs actually incurred or expected to be incurred in connection with forwarding the Notice and which would not have been incurred but for the obligation to forward the Notice, upon submission of appropriate documentation to the Claims Administrator.

DATED: May 27, 2015

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION