UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION	)	**MDL No. 2804**
	)	**Case No. 1:17-MD-2804**
	)	**Judge Dan Aaron Polster**

MOTION OF THE DIRECTORS OF THE TRIBAL ABATEMENT FUND TRUST VI FOR AN ORDER APPROVING FINAL ACCOUNTING AND THE DISSOLUTION OF THE TRIBAL ABATEMENT FUND TRUST VI

The Directors Mary Smith, Kathy Hannan and Kevin Washburn (collectively, the "Directors"), in their capacities as trustees of the Tribal Abatement Fund Trust VI ("TAFT VI" or the "Trust"), which was created pursuant to the Walmart Tribal Settlement Agreement dated as of November 14, 2022 between the Tribal Leadership Committee, the Participating Tribes, and Walmart (as modified, amended, or supplemented from time to time, the "Walmart Tribal Settlement Agreement"), by and through counsel, hereby respectfully request that the Court enter an Order (substantially in the form attached hereto as **Exhibit A**) (i) approving the final accounting for TAFT VI, consisting of the audited financial statements covering the period from inception (February 24, 2023) through December 31, 2023 along with additional financial reports covering the years ended December 31, 2024 and December 31, 2025, and the period from January 1, 2026 through the cessation of Trust activity attached hereto as **Exhibit B** (collectively, the "Final Accounting"), and (ii) approving the dissolution of TAFT VI as set forth in Section 6.2(b) of the

Tribal Abatement Fund Trust VI Trust Agreement, dated as of February 24, 2023 (the "TAFT VI Trust Agreement"). In support of their motion, the Directors state as follows:

1. This Court has continuing jurisdiction over the Trust, as provided in Section 1.6 of the TAFT VI Trust Agreement.

2. Section 6.2(b) of the TAFT VI Trust Agreement provides that the Trust shall dissolve as soon as practicable but no later than ninety (90) days after the date on which this Court approves the dissolution upon the satisfaction of the purposes of the Trust, wherein: (i) all reasonably expected assets have been collected by TAFT VI, (ii) all Abatement Distributions[1] have been made to the extent set forth in the Section 4.2(b) of the TAFT VI Trust Agreement, (iii) necessary arrangements and reserves have been made to discharge all anticipated remaining Trust obligations and TAFT VI Operating Expenses in a manner consistent with the Walmart Tribal Settlement Agreement and the Trust Documents, and (iv) a final accounting has been filed and approved by this Court. The Directors hereby submit that the foregoing conditions to dissolution have been satisfied as follows:

(i) Pursuant to the Walmart Tribal Settlement Agreement, the Trust's entire funding consisted of $67,298,897 of Trust Assets received from the Walmart Settlement Trust. These Trust Assets, along with any interest income earned thereon by the Trust, constitute all reasonably expected assets of the Trust and this full amount has been collected by the Trust.

(ii) As set forth in the Final Accounting, $62,599,345.02 in Abatement Distributions were made during the period ended December 31, 2023, an additional $1,174,901.54 in Abatement Distributions were made during the

[1] Unless otherwise defined herein, all capitalized terms shall have the meaning supplied to them by the TAFT VI Trust Agreement and/or Walmart Tribal Settlement Agreement, as applicable.

year ended December 31, 2024, an additional $591,638.31 in Abatement Distributions were made during the year ended December 31, 2025, and an additional $83,915.07 in Abatement Distributions were made during the first half of 2026, for total Abatement Distributions of $64,449,799.94 to Tribe Beneficiaries. The Directors submit that these amounts represent all the Abatement Distributions to be made by TAFT VI pursuant to Section 4.2(b) of the TAFT VI Trust Agreement. Having determined that distributing the remaining Trust funds to individual Tribe Beneficiaries was not cost-effective with respect to the Trust's remaining assets consisting of a cash balance of $251,835.98, the Directors, pursuant to Section 4.2(e) of the TAFT VI Trust Agreement, elected to distribute the remaining Trust funds to the Johns Hopkins University Center for Indigenous Health, a tax-exempt organization, to be used exclusively for opioid abatement purposes. There will be no further financial activity prior to dissolution.

(iii) The Directors submit that all Trust obligations and TAFT VI Operating Expenses have been discharged in a manner consistent with the Walmart Tribal Settlement Agreement and the Trust Documents.

(iv) The Trust's Final Accounting has herewith been filed for approval by this Court.

3. Accordingly, the Directors hereby respectfully request that the Court enter an Order (i) approving the Final Accounting, and (ii) approving the dissolution of TAFT VI, and thereby ordering TAFT VI to subsequently be wound down as soon as practicable, but no later than ninety (90) days, in accordance with the terms of the TAFT VI Trust Agreement.

4. Notice of this Motion will be posted on the Tribal Opioid Settlement Website, and the Motion will be served upon the Trust Protector and Delaware Trustee in accordance with the TAFT VI Trust Agreement.

Respectfully submitted this 21st day of July, 2026.

/s/ Joseph E. Lehnert
Joseph E. Lehnert (0089492)
Keating Muething & Klekamp PLL
One East Fourth Street, Suite 1400
Cincinnati, Ohio 45202
Phone: (513) 639-3929
Fax: (513) 579-6457
jlehnert@kmklaw.com

Counsel for Directors Mary Smith, Kathy Hannan and Kevin Washburn, in their capacities as trustees of the Tribal Abatement Fund Trust VI

CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2026, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record, and that the following were also served by electronic mail and overnight courier:

Wilmington Trust, N.A.
1100 North Market Street
Wilmington, DE 19890
Attn: Russell L. Crane
Email: rcrane@wilmingtontrust.com

Morris James, LLP
3205 Avenue North Blvd, Suite 100
Wilmington, DE 19803
Attn: Ross Antonacci, Esq.
Email: RAntonacci@morrisjames.com

Stacy Leeds
c/o Leeds Consulting LLC
11177 N. Highway 10
Tahlequah OK 74464
Email: Admin@tribalopioidsettlements.com

Brown Rudnick LLP
7 Times Square
New York, NY 11036
Attn: David J. Molton, Esq., Barbara J. Kelly, Esq.
Email: dmolton@brownrudnick.com, bkelly@brownrudnick.com

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/s/ Joseph E. Lehnert
Joseph E. Lehnert

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION	)	**MDL No. 2804**
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	)	**Judge Dan Aaron Polster**

ORDER GRANTING MOTION OF THE DIRECTORS OF THE TRIBAL ABATEMENT FUND TRUST VI FOR AN ORDER APPROVING FINAL ACCOUNTING AND THE DISSOLUTION OF THE TRIBAL ABATEMENT FUND TRUST VI

This matter is before the Court upon the Motion of Directors Mary Smith, Kathy Hannan and Kevin Washburn (collectively, the "Directors"), in their capacities as trustees of the Tribal Abatement Fund Trust VI ("TAFT VI"), for an Order (i) approving the final accounting for TAFT VI, consisting of the audited financial statements covering the period from inception (February 24, 2023) through December 31, 2023 along with additional financial reports covering the years ended December 31, 2024 and December 31, 2025, and the period from January 1, 2026 through the cessation of Trust activity, attached to the Motion as **Exhibit B** (collectively, the "Final Accounting") and (ii) approving the dissolution of TAFT VI as set forth in Section 6.2(b) of the Tribal Abatement Fund Trust VI Trust Agreement, dated as of February 24, 2023 (the "TAFT VI Trust Agreement"). The Court, having reviewed and considered the Motion, and being fully advised of the premises, finds that good and sufficient notice of the Motion was provided to all

interested parties, and further finds good cause for granting the Motion and the relief sought therein. It is therefore **ORDERED**:

1. The Final Accounting of TAFT VI attached to the Motion as "Exhibit B" is hereby approved as the final accounting for TAFT VI pursuant to Section 6.2(b)(iv) of the TAFT VI Trust Agreement.

2. The dissolution of TAFT VI in accordance with Section 6.2 of the TAFT VI Trust Agreement is further hereby approved.

It is so ORDERED.

IT IS SO ORDERED.

DAN AARON POLSTER
UNITED STATED DISTRICT JUDGE

Dated:

TAFT VI	2023	2024	2025	2026	
Funding	65,248,897.15	1,000,000.00	1,050,000.00		
Distributions to Trust Beneficiaries	(62,599,345.02)	(1,174,901.54)	(591,638.31)	(83,915.07)	
Total funding, net of distributions	2,649,552.13	(174,901.54)	458,361.69	(83,915.07)	
Interest income	1,121,370.73	79,092.44	37,733.27	12,734.01	
Operating expenses	(833,285.77)	(806,470.55)	(746,611.68)	(1,461,823.68)	
Income tax expense	-				
Interest and transfers in, net of operating expenses	288,084.96	(727,378.11)	(708,878.41)	(1,449,089.67)	
Increase in net assets	2,937,637.09	(902,279.65)	(250,516.72)	(1,533,004.74)	
Net assets - beginning of the period	-	-	(902,279.65)	(1,152,796.37)	
Net assets - end of the period	2,937,637.09	(902,279.65)	(1,152,796.37)	(2,685,801.11)	