

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

Plaintiff,

v.

EDWARDS LIFESCIENCES CORP.

and

GENESIS MEDTECH GROUP LIMITED

Defendants.

Civil Action No.

STIPULATION AND ORDER

It is stipulated by and between the undersigned parties, subject to approval and entry by the Court, that:

(1) The Court has jurisdiction over the subject matter of this action and over each of the parties hereto, and venue for this action is proper in the United States District Court for the District of Columbia. Defendant Edwards Lifesciences Corp. (“Edwards”) waives service of summons of the Complaint and authorizes Cleary Gottlieb Steen & Hamilton LLP to accept service of all process in this matter on its behalf. Defendant Genesis Medtech Group Limited (“Genesis”) consents to personal jurisdiction and venue in the District of Columbia and waives service of summons of the Complaint and authorizes Wilson Sonsini Goodrich & Rosati P.C. to accept service of all process in this matter on its behalf;

(2) A Final Judgment in the form attached as Exhibit A may be filed with and entered by the Court, upon the motion of the United States or upon the Court’s own motion, after

compliance with the requirements of the Antitrust Procedures and Penalties Act (“APPA”) (15 U.S.C. § 16), and without further notice to any party or other proceedings, provided that the United States has not withdrawn its consent. The United States may withdraw its consent at any time before the entry of judgment by serving notice on Defendants and filing that notice with the Court;

(3) Defendants must arrange, at their expense, publication as quickly as possible of the newspaper notice required by the APPA, which will be drafted by the United States in its sole discretion. The publication must be arranged no later than five (5) business days after Defendants’ receipt from the United States of the text of the notice and the identity of the newspaper or newspapers within which the publication must be made. Defendants must promptly send to the United States (a) confirmation that publication of the newspaper notice has been arranged and (b) the certification of the publication prepared by the newspaper or newspapers within which the notice was published;

(4) This Stipulation and Order applies with equal force and effect to any amended proposed Final Judgment agreed upon in writing by the United States and Defendants and submitted to the Court;

(5) Defendants each represent that the actions it is required to perform pursuant to the proposed Final Judgment can and will be performed, and that the Defendants will not later raise a claim of mistake, hardship, or difficulty of compliance as grounds for asking the Court to modify any of its provisions;

(6) In the event that (a) the United States has withdrawn its consent, as provided in Paragraph (2); (b) the United States voluntarily dismisses the Complaint in this matter; or (c) the Court declines to enter the proposed Final Judgment, the time has expired for all appeals of any

ruling declining entry of the proposed Final Judgment, and the Court has not otherwise ordered continued compliance with the terms and provisions of the proposed Final Judgment. Defendants are released from all further obligations under this Stipulation and Order and the making of this Stipulation and Order will be without prejudice to any party in this or any other proceeding; and

(7) The entry of the Final Judgment in accordance with this Stipulation and Order settles, discharges, and releases any and all claims of the United States for civil penalties and equitable relief pursuant to Section 7A(g)(1) of the Clayton Act, 15 U.S.C. § 18a(g)(1), against Defendants for failure to comply with Section 7A of the Clayton Act, 15 U.S.C. § 18a, in connection with Defendant Edwards' acquisition of JC Medical, Inc. and Edwards' investment in Defendant Genesis.

FOR THE DEFENDANTS:

Edwards Lifesciences Corp.

By: 
Ryan Shores (D.C. Bar #500031)
Cleary Gottlieb Steen & Hamilton LLP
2112 Pennsylvania Avenue, N.W.
Washington, D.C. 20037

Counsel for Defendant Edwards Lifesciences Corp.

Dated: 6/11/2026

Genesis Medtech Group Limited

By: 
Michelle Yost Hale (D.C. Bar #1048273)
Wilson Sonsini Goodrich & Rosati P.C.
1700 K Street NW
Fifth Floor
Washington, D.C. 20006-3817

Counsel for Defendant Genesis MedTech Group Limited

Dated: 6/11/2026

FOR PLAINTIFF UNITED STATES:

/s/ Stanley E. Woodward, Jr.
Stanley E. Woodward, Jr. (DC Bar # 997320)
Assistant Attorney General
United States Department of Justice
Antitrust Division
950 Pennsylvania Avenue, N.W.
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/s/ Daniel S. Guarnera
Daniel S. Guarnera (DC Bar #1034844)
Director, Bureau of Competition

/s/ David Shaw
David Shaw (DC Bar #996525)
Principal Deputy Director, Bureau of
Competition

/s/ Taylor Hoogendoorn
Taylor Hoogendoorn (DC Bar #1672463)
Deputy Director, Bureau of Competition

/s/ Maribeth Petrizzi
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/s/ Jordan S. Andrew
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Acting Assistant Director

/s/ Jamie Towey
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ORDER

IT IS SO ORDERED by the Court, this _____ day of _____, _____.

United States District Judge