

Exhibit A

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GMO TRUST, GMO ALPHA ONLY FUND, GMO BENCHMARK FREE FUND, GMO IMPLEMENTATION FUND, GMO DEVELOPED WORLD STOCK FUND, GMO INTERNATIONAL LARGE/MID CAP EQUITY FUND, GMO INTERNATIONAL EQUITY FUND, GMO TAX-MANAGED INTERNATIONAL EQUITIES FUND, GMO FUNDS PLC, GMO GLOBAL EQUITY ALLOCATION INVESTMENT FUND, GMO WORLD EQUITY ALLOCATION INVESTMENT FUND PLC, GMO GLOBAL REAL RETURN (UCITS) FUND, GMO OFFSHORE MASTER PORTFOLIOS II LTD., GMO EVENT-DRIVEN MASTER PORTFOLIO, GMO GLOBAL EQUITY TRUST, GMO MASTER PORTFOLIOS (ONSHORE), L.P., GMO MEAN REVERSION FUND (ONSHORE), GMO TAX-MANAGED GLOBAL BALANCED PORTFOLIO, GMO MEAN REVERSION SPECIAL SOLUTION

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
SOMERSET COUNTY

CIVIL ACTION

DOCKET NO. C-12010-22

COMPLAINT

FUND, L.P., BRAHMAN PARTNERS II, L.P.,
 BRAHMAN PARTNERS III, L.P., BRAHMAN
 PARTNERS II OFFSHORE, LTD., BRAHMAN
 INSTITUTIONAL PARTNERS, L.P., BRAHMAN
 C.P.F. PARTNERS, L.P., BRAHMAN PARTNERS IV,
 L.P., BRAHMAN PARTNERS IV (CAYMAN), LTD.,
 BH INVESTMENTS FUND, L.L.C., EAST 71, LTD.,
 VALIC COMPANY I, VALIC COMPANY II,
 SUNAMERICA SERIES TRUST, SEASONS SERIES
 TRUST, DISCOVERY GLOBAL CITIZENS MASTER
 FUND, LTD., DISCOVERY GLOBAL FOCUS
 MASTER FUND, LTD., DISCOVERY GLOBAL
 MACRO MASTER FUND, LTD., DISCOVERY
 GLOBAL OPPORTUNITY MASTER FUND, LTD.,
 MSD TORCHLIGHT PARTNERS, L.P., MSD
 TORCHLIGHT PARTNERS (MM), L.P., INCLINE
 GLOBAL MASTER LP, INCLINE GLOBAL ELS LP,
 OKUMUS OPPORTUNISTIC VALUE COMPANY
 LTD., MAPLES LIQUIDATION SERVICES LIMITED
 AS VOLUNTARY LIQUIDATOR OF MAVERICK
 NEUTRAL LEVERED FUND, LTD., MAVERICK
 CAPITAL LTD., AS ASSIGNEE OF MAVERICK
 FUND, L.D.C. AND MAVERICK SELECT FUND,
 LTD., MAVERICK FUND II, LTD., MAVERICK
 LONG ENHANCED FUND, LTD., MAVERICK LONG
 FUND, LTD., MAVERICK FUND USA, LTD.,
 PACIFIC SELECT FUND, PACIFIC FUNDS SERIES
 TRUST, STICHTING
 BEDRIJFSTAKPENSIOENFONDS VOOR HET
 SCHILDERS-AFWERKINGSEN GLASZETBEDRIJF,
 STICHTING PGGM DEPOSITARY, USAA MUTUAL
 FUNDS TRUST, INTERNATIONALE
 KAPITALANLAGEGESELLSCHAFT MBH, GIC
 PRIVATE LTD., 2012 DYNASTY UC LLC, FLINN
 INVESTMENTS, LLC, LAWRENCE FLINN, JR. 1975
 TRUST FBO ADRIANE S. FLINN, LAWRENCE
 FLINN, JR. 1975 TRUST FBO LAWRENCE FLINN
 III, LFJR 2010 GRAT REMAINDER TRUST, LFJR
 2012 DYNASTY LLC - SERIES A, LAWRENCE
 FLINN, JR. 1975 TRUST FBO MARION FLINN
 MOULTON, STEPHANIE AND LAWRENCE FLINN,
 JR. CHARITABLE TRUST, and STEPHANIE S.
 FLINN MASTER PARTNERSHIP

Plaintiffs,

v.

BAUSCH HEALTH COMPANIES INC. and BAUSCH
+ LOMB CORPORATION,
Defendants.

Plaintiffs GMO Trust, GMO Alpha Only Fund, GMO Benchmark Free Fund, GMO Implementation Fund, GMO Developed World Stock Fund, GMO International Large/Mid Cap Equity Fund, GMO International Equity Fund, GMO Tax-Managed International Equities Fund, GMO Funds PLC, GMO Global Equity Allocation Investment Fund, GMO World Equity Allocation Investment Fund PLC, GMO Global Real Return (UCITS) Fund, GMO Offshore Master Portfolios II Ltd., GMO Event-Driven Master Portfolio, GMO Global Equity Trust, GMO Master Portfolios (Onshore), L.P., GMO Mean Reversion Fund (Onshore), GMO Tax-Managed Global Balanced Portfolio, and GMO Mean Reversion Special Solution Fund, L.P. (collectively, the “GMO Plaintiffs”), Brahman Partners II, L.P., Brahman Partners III, L.P., Brahman Partners II Offshore, Ltd., Brahman Institutional Partners, L.P., Brahman C.P.F. Partners, L.P., Brahman Partners IV, L.P., Brahman Partners IV (Cayman), Ltd., BH Investments Fund, L.L.C., and East 71, Ltd. (collectively, the “Brahman Plaintiffs”), VALIC Company I, VALIC Company II, SunAmerica Series Trust, and Seasons Series Trust (collectively, the “SAAMCo Plaintiffs”), Discovery Global Citizens Master Fund, Ltd., Discovery Global Focus Master Fund, Ltd., Discovery Global Macro Master Fund, Ltd., and Discovery Global Opportunity Master Fund, Ltd. (collectively, the “Discovery Plaintiffs”), MSD Torchlight Partners, L.P. and MSD Torchlight Partners (MM), L.P. (collectively, the “MSD Plaintiffs”), Incline Global Master LP and Incline

Global ELS LP (collectively the “Incline Plaintiffs”), Okumus Opportunistic Value Company Ltd. (“Plaintiff Okumus”), Maples Liquidation Services Limited as Voluntary Liquidator of Maverick Neutral Levered Fund, Ltd., Maverick Capital Ltd., as assignee of Maverick Fund, L.D.C. and Maverick Select Fund, Ltd., Maverick Fund II, Ltd., Maverick Long Enhanced Fund, Ltd., Maverick Long Fund, Ltd., and Maverick Fund USA, Ltd. (collectively, the “Maverick Plaintiffs”), Pacific Select Fund and Pacific Funds Series Trust (together, the “Pacific Funds Plaintiffs”), Stichting PGGM Depository (“Plaintiff PGGM”), Stichting Bedrijfstakpensioenfondsvoor het Schilders-Afwerkingsen Glaszetbedrijf (“Plaintiff Schilders”), USAA Mutual Funds Trust (“Plaintiff USAA”), Internationale Kapitalanlagegesellschaft mbH (“Plaintiff INKA”), Plaintiff GIC Private Ltd. (“Plaintiff GIC”), 2012 Dynasty UC LLC, Flinn Investments, LLC, Lawrence Flinn, Jr. 1975 Trust FBO Adriane S. Flinn, Lawrence Flinn, Jr. 1975 Trust FBO Lawrence Flinn III, LFJR 2010 GRAT Remainder Trust, LFJR 2012 Dynasty LLC - Series A, Lawrence Flinn, Jr. 1975 Trust FBO Marion Flinn Moulton, Stephanie and Lawrence Flinn, Jr. Charitable Trust, and Stephanie S. Flinn Master Partnership (collectively the “Privet Plaintiffs” and, together with the GMO Plaintiffs, the Brahman Plaintiffs, the SAAMCo Plaintiffs, the Discovery Plaintiffs, the MSD Plaintiffs, Plaintiff Okumus, the Maverick Plaintiffs, Plaintiff PGGM, Plaintiff Schilders, the Pacific Funds Plaintiffs, Plaintiff INKA, and Plaintiff GIC, “Plaintiffs”) through their respective undersigned attorneys, by way of this Complaint, bring this action against Bausch Health Companies Inc. (f/k/a Valeant Pharmaceuticals International, Inc.) (“Bausch Health”) and Bausch + Lomb Corporation (“Bausch + Lomb”) for a declaratory judgment pursuant to N.J.S.A. 2A:16-53 that transfers made in connection with Bausch Health’s corporate spin-off of its vision health assets to Bausch + Lomb are voidable as fraudulent transfers under the New Jersey Voidable Transactions Act, N.J.S.A. 25:2-20 *et seq.*

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