



IN THE DISTRICT COURT OF CLEVELAND COUNTY

STATE OF OKLAHOMA

STATE OF OKLAHOMA
CLEVELAND COUNTY, S.S.
FILED In The
Office of the Court Clerk

JAN 10 2018

In the office of the
Court Clerk MARILYN WILLIAMS

STATE OF OKLAHOMA, ex rel.,
MIKE HUNTER,
ATTORNEY GENERAL OF OKLAHOMA,

Plaintiff,

vs.

PURDUE PHARMA L.P., *et al.*

Defendants.

Case No. CJ-2017-816

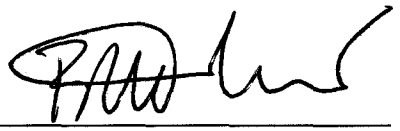
Honorable Thad Balkman

**SUPPLEMENT TO
DEFENDANTS' OPPOSITION TO PLAINTIFF'S
MOTION FOR ENTRY OF SCHEDULING ORDER AND
CROSS-MOTION FOR ENTRY OF SCHEDULING ORDER**

COME NOW Defendants and file this Supplement to their Opposition to Plaintiff's Motion for Entry of Scheduling Order and Cross-Motion For Entry Of Scheduling Order, which was filed on January 9, 2018 (hereinafter interchangeably referred to as "Defendants' Opposition"). Defendants' Opposition makes reference to Attachment A, the Defendants' Proposed Scheduling Order. The attachment was unintentionally omitted. Defendants' Proposed Scheduling Order is now provided to the Court and the Parties of Record by way of Attachment A to this Supplement.

Dated: January 10, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to Okla. Stat. tit. 12, § 2005(D), this is to certify on January 10, 2018, a true and correct copy of the above and foregoing has been served via the United State Postal Service, First Class postage prepaid, to the following:

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**IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA**

STATE OF OKLAHOMA, ex rel.,
MIKE HUNTER,
ATTORNEY GENERAL OF OKLAHOMA,

Plaintiff,

vs.

- (1) PURDUE PHARMA L.P.;
- (2) PURDUE PHARMA, INC.;
- (3) THE PURDUE FREDERICK COMPANY,
INC.;
- (4) TEVA PHARMACEUTICALS USA, INC.;
- (5) CEPHALON, INC.;
- (6) JOHNSON & JOHNSON;
- (7) JANSSEN PHARMACEUTICALS, INC.;
- (8) ORTHO-McNEIL-JANSSEN
PHARMACEUTICALS, INC., n/k/a
JANSSEN PHARMACEUTICALS, INC.;
- (9) JANSSEN PHARMACEUTICA, INC.,
n/k/a JANSSEN PHARMACEUTICALS,
INC.;
- (10) ALLERGAN, PLC, f/k/a ACTAVIS PLC,
f/k/a ACTAVIS, INC., f/k/a WATSON
PHARMACEUTICALS, INC.;
- (11) WATSON LABORATORIES, INC.;
- (12) ACTAVIS LLC; and
- (13) ACTAVIS PHARMA, INC.,
f/k/a WATSON PHARMA, INC.,

Defendants.

Case No. CJ-2017-816

Honorable Thad Balkman

**DEFENDANTS' PROPOSED SCHEDULING ORDER/ORDER FOR STATUS
CONFERENCE**

WHEREAS, the parties assert that the above-entitled cause is at issue, the Court, pursuant to Rule 5 of the Rules for the District Courts of Oklahoma, finds and Orders as follows:

Scheduling Order

1. The following deadlines shall apply:



	Event	Deadline
1.	Plaintiff to disclose computation of any category of damages claimed and related materials under 12 O.S. § 3226(A)(2)	February 2, 2018
2.	Motions to Amend Pleadings	March 1, 2018
3.	Plaintiff discloses expert witnesses and provides information set forth in 12 O.S. § 3226(B)(4)(a)(1)	January 4, 2019
4.	Defendants disclose expert witnesses and provide information set forth in 12 O.S. § 3226(B)(4)(a)(1)	February 15, 2019
5.	Fact Discovery Cutoff	March 1, 2019
6.	Service of Plaintiff's Expert Report(s)	March 1, 2019
7.	Service of Defendants' Expert Report(s)	May 15, 2019
8.	Expert Witness Depositions Completed	August 15, 2019 ¹
9.	<i>Christian v. Gray (Daubert)</i> Motions	September 16, 2019
10.	Hearing on <i>Christian v. Gray (Daubert)</i> Motions	November 2019 or at Court's Convenience
11.	Dispositive Motions	December 2, 2019
12.	Plaintiff's Final Witness and Exhibit Lists	December 16, 2019
13.	Defendants' Final Witness and Exhibit Lists	January 15, 2020
14.	Hearing/Argument on Dispositive Motions	February 2020 or at Court's Convenience
15.	Designation of Deposition Testimony	February 14, 2020
16.	Motions <i>in Limine</i>	February 28, 2020
17.	Settlement Conference/Mediation	March 16, 2020
18.	Pretrial Conference Date & Time	March 23, 2020 or at Court's Convenience
19.	Objections to Deposition Testimony	April 6, 2020
20.	Requested Jury Instructions	April 6, 2020
21.	Requested Voir Dire	April 6, 2020
22.	Trial Briefs	April 6, 2020
23.	Trial Date	April 27, 2020

1. The above deadlines are firm once set and **shall not be changed** except by **written application**, submitted to this Court for a hearing and ruling thereon at least ten (10) days prior to Status Conference, unless good cause is otherwise shown.
2. All discovery must be **COMPLETED** by the above date. Serve your discovery requests so that responses may be made and any discovery disputes can be concluded prior to the **discovery completion date**.
3. Unless otherwise ordered, mediation shall be completed in each case. A **joint application and order** to waive the mediation requirement may be submitted for the Court's review.
4. Courtesy copies of all motions and responses shall be provided to the Court upon filing.

¹ Depositions of Plaintiff's experts shall be completed before any of Defendants' experts are deposed.

Order for Status Conference

A Status Conference shall be held on the 23rd day of March, 2020, at _____ before the undersigned Judge. The following Orders regarding the Status Conference are hereby entered:

1. **Each party** shall be represented at the Status Conference by counsel who will conduct the trial, or by co-counsel, with full knowledge of the case and authority to bind such party by stipulation, or by the party in person, if without counsel;
2. **Default. Parties who fail to appear** pursuant to this Order shall be considered in **DEFAULT**, and subject to judgment against them, dismissal of claims or sanctions as appropriate;
3. **Resets and Continuances:** Resetting of Status Conference will **only** be approved upon submission of a **joint** motion and order OR by a ruling on an opposed Motion for Continuance;
4. **Discovery.** Discovery shall be **COMPLETED**, prior to the Status Conference, unless a **joint** request to extend scheduling deadlines for that purpose is approved;
5. **Dispositive Motions.** All dispositive motions shall be **filed AND heard** prior to the Status Conference. Failure to comply shall result in a denial of any dispositive motions filed in violation of this order, unless a **joint** request to extend scheduling deadlines for that purpose is also approved; and,
6. **Mediation.** Mediation shall be completed prior to Status Conference, unless a **joint** request to extend scheduling deadlines for that purpose is also approved.

Failure to comply with this Order for Status Conference shall result in an appropriate sanction as allowed by law.

IT IS SO ORDERED this _____ day of _____,

JUDGE OF THE DISTRICT COURT

APPROVED:

COUNSEL FOR PLAINTIFF

COUNSEL FOR DEFENDANT

COUNSEL FOR PLAINTIFF

COUNSEL FOR DEFENDANT