



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; §  
 (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., §  
 §

STATE OF OKLAHOMA } S.S.  
 CLEVELAND COUNTY }  
**FILED** In The  
 Office of the Court Clerk  
 MAR 08 2018

In the office of the  
 Court Clerk MARILYN WILLIAMS

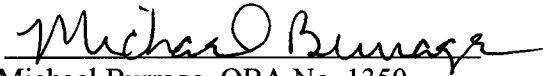
Case No. CJ-2017-816

The Honorable Thad Balkman

**MOTION TO ASSOCIATE COUNSEL**

Plaintiffs, State of Oklahoma ex rel., Mike Hunter, Attorney General of Oklahoma, hereby move the Court for an Order permitting Andrew G. Pate to practice in the above styled and numbered cause pursuant to the Rules Creating and Controlling the Oklahoma Bar Association, 5 O.S. Ch. 1, App.1, Art. II. This motion is supported by the attached "Signed Application" (Exhibit A), "Certificate(s) of Good Standing (Exhibit B), and the "Certificate of Compliance" from the Oklahoma Bar Association (Exhibit C).

Submitted by:



Michael Burrage, OBA No. 1350

Reggie Whitten, OBA No. 9576

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ATTORNEY GENERAL

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Glen Coffee, OBA No. 14563

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***Attorneys for Plaintiff***

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the above and foregoing was mailed, postage prepaid, on March 8 2018, to:

Sanford C. Coats, OBA No. 18268  
Cullen D. Sweeney, OBA No. 30269  
CROWE & DUNLEVY, P.C.  
Braniff Building  
324 N. Robinson Ave., Ste. 100  
Oklahoma City, OK 73102

Sheila Birnbaum  
Mark S. Cheffo  
Hayden A. Coleman  
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51 Madison Avenue, 22nd Floor  
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R. Ryan Stoll  
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP  
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Chicago, Illinois 60606

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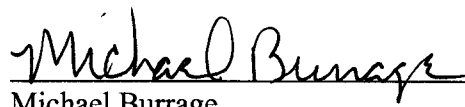
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Oklahoma City, OK 73072

Charles C. Lifland  
Jennifer D. Cardelus  
O'MELVENY & MYERS LLP  
400 S. Hope Street  
Los Angeles, CA 90071

Stephen D. Brody  
O'MELVENY & MYERS LLP  
1625 Eye Street NW  
Washington, DC 20006

  
\_\_\_\_\_  
Michael Burrage

# **EXHIBIT A**

# APPLICATION

AP



## OUT OF STATE ATTORNEY REGISTRATION

Andrew Gordon Pate, Applicant, respectfully represents:  
First Name Middle Name Last Name

1. Applicant is an attorney at law and a member of the law firm of \_\_\_\_\_  
Nix, Patterson & Roach, LLP

with its principal offices located at 3600 N. Capital of Texas Hwy., Bldg. B, Suite 350  
Mailing Address  
Austin, Travis County, TX, 78746  
City State Zip Code  
(512) 328-5333, ( ) N/A, (512) 328-5335  
Telephone (Firm) Telephone (Applicant's Direct Dial) Fax (Applicant)

dpate@nixlaw.com. If Applicant's office address is different from above,  
E-mail Address (Applicant)

please provide the following: Same as above.  
Mailing Address  
\_\_\_\_\_  
City County State Zip Code

2. Applicant is admitted to practice and is a member in good standing  
(certificates of good standing attached) of the bar(s) of the highest state court(s)  
of the following state(s):

<u>State</u>	<u>Date of Admission</u>
<u>Texas</u>	<u>2011</u>
_____	_____
_____	_____

3. Applicant is admitted to practice before the following United States District  
Courts, United States Circuit Courts of Appeal, the Supreme Court of the United  
States, and/or other tribunals on the dates indicated for each, and is presently a  
member in good standing of the bars of said courts:

<u>Tribunal</u>	<u>Date of Admission</u>
<u>Eastern District of Texas</u>	<u>07/24/2014</u>
<u>Eastern District of Michigan</u>	<u>01/03/2018</u>

Eastern District of Oklahoma

06/13/2017

Western District of Oklahoma

06/13/2017

4. Have you ever been suspended or disbarred in any court except as hereinafter provided (Give particulars; e.g. court, jurisdiction, date): No

5. Are you currently subject to any pending disciplinary proceedings by any organization with authority to discipline attorneys at law except as hereinafter provided (Give particulars; e.g. court, discipline authority, date, status): No

6. Have you ever received public discipline including, but not limited to, suspension or disbarment, by any organization with authority to discipline attorneys at law except as hereinafter provided (Give particulars; e.g. court, discipline authority, type of discipline, date, status): No

7. Have you ever had any certificate or privilege to appear and practice before any regulatory or administrative body suspended or revoked except as hereinafter provided (Give particulars; e.g. administrative body, date, status of suspension or reinstatement):  
No

8. Applicant seeks admission to practice in the State of Oklahoma in the following matter (give particulars; e.g. caption of case, court or agency, type of matter, party to be represented): **Note - A separate application is to be submitted for each matter in which the applicant seeks admission!**  
State of Oklahoma, ex rel., Mike Hunter, Attorney General of Oklahoma v.

Purdue Pharma, et al.; District Court of Cleveland County; Case No. CJ-2017-816;

False Claims/Public Nuisance/Fraud; Requesting to represent Plaintiff

9. The Oklahoma Bar Association member who is counsel of record for Applicant in this matter is:

Michael Burrage 1350  
First Name Middle Name Last Name O.B.A. Number

512 N. Broadway Ave., Suite 300, Oklahoma City, OK, 73102  
Mailing Address City State Zip Code

(405) 516-7800, (405) 916-7859, murrage@whittenburrage.com  
Telephone Number Fax Number E-mail Address

10. The following accurately represents the names of each party in this matter and the names and addresses of each counsel of record who appear for that party:

Party Name Counsel Name Address of Counsel

Please see attached sheet.

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11. Applicant certifies that he/she shall be subject to the jurisdiction of the courts and disciplinary boards of this state with respect to the laws of this state governing the conduct of attorneys to the same extent as a member of the Oklahoma Bar Association.

12. Applicant understands and shall comply with the standards of professional conduct required of members of the Oklahoma Bar Association.



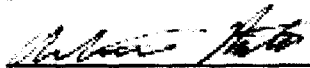
13. Applicant has disclosed in writing to the client that the Applicant is not admitted to practice in this jurisdiction and the client has consented to such representation.

I, Andrew G. Pate, do hereby swear/affirm under penalty of perjury that the assertions of this application are true:

I am the Applicant in the above referenced matter; I have read the foregoing and know the contents thereof; the same is true of my own knowledge except as to those matters therein stated on information and belief, and as to those matters I believe them to be true.

I further certify that I am subject to the jurisdiction of the Courts and disciplinary boards of this state with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the Oklahoma Bar Association; I understand and shall comply with the standards of professional conduct required by members of the Oklahoma Bar Association; and that I am subject to the disciplinary jurisdiction of the Oklahoma Bar Association with respect to any of my actions occurring in the course of such appearance.

DATED this 28th day of February, 2018.

  
\_\_\_\_\_  
Applicant

Mail with check or money order (payable to the OBA) to:

Out-of-State Attorney Registration  
Oklahoma Bar Association  
P.O. Box 53036  
Oklahoma City, OK 73152-3036

**10. The following accurately represents the names of each party in this matter and the names and addresses of each counsel of record who appear for that party:**

**For Plaintiff- State of Oklahoma, ex rel., Mike Hunter, Attorney General of Oklahoma:**

Reggie Whitten  
Michael Burrage  
WHITTEN BURRAGE  
512 North Broadway Avenue, Suite 300  
Oklahoma City, OK 73102

**For Plaintiff- State of Oklahoma, ex rel., Mike Hunter, Attorney General of Oklahoma:**

Mike Hunter  
ATTORNEY GENERAL FOR THE STATE  
OF OKLAHOMA  
Abby Dillsaver  
GENERAL COUNSEL TO THE  
ATTORNEY GENERAL  
Ethan A. Shaner, OBA No. 30916  
DEPUTY GENERAL COUNSEL  
313 N.E. 21st Street  
Oklahoma City, OK 73105

**For Plaintiff- State of Oklahoma, ex rel., Mike Hunter, Attorney General of Oklahoma:**

Bradley E. Beckworth  
Jeffrey J. Angelovich  
NIX, PATTERSON & ROACH, LLP  
512 North Broadway Avenue, Suite 200  
Oklahoma City, OK 73102

**For Plaintiff- State of Oklahoma, ex rel., Mike Hunter, Attorney General of Oklahoma:**

Glen Coffee  
GLEN COFFEE & ASSOCIATES, PLLC  
915 North Robinson Avenue  
Oklahoma City, OK 73102

**For Defendants- Purdue Pharma, L.P., Purdue Pharma Inc., and The Purdue Frederick Company, Inc.:**

Sanford C. Coats, OBA No. 18268  
Cullen D. Sweeney, OBA No. 30269  
CROWE & DUNLEVY, P.C.  
Braniff Building  
324 N. Robinson Ave., Ste. 100  
Oklahoma City, OK 73102

**For Defendants- Purdue Pharma, L.P., Purdue Pharma Inc., and The Purdue Frederick Company, Inc.:**

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Mark S. Cheffo  
Hayden A. Coleman  
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51 Madison Avenue, 22nd Floor  
New York, New York 10010

**For Defendants- Purdue Pharma, L.P., Purdue Pharma Inc., and The Purdue Frederick Company, Inc.:**

Patrick J. Fitzgerald  
R. Ryan Stoll  
SKADDEN, ARPS, SLATE, MEAG  
HER & FLOM LLP  
155 North Wacker Drive, Suite 2700  
Chicago, Illinois 60606

**For Defendants- Cephalon, Inc., Teva Pharmaceuticals USA, Inc., Watson Laboratories, Inc., Actavis LLL, and Actavis Pharma, Inc., f/k/a Watson Pharma, Inc.:**

Robert G. McCampbell, OBA No. 10390  
Travis J. Jett, OBA No. 30601  
GABLEGOTWALS  
One Leadership Square, 15th Floor  
211 North Robinson  
Oklahoma City, OK 73102

**For Defendants- Cephalon, Inc., Teva Pharmaceuticals USA, Inc., Watson Laboratories, Inc., Actavis LLL, and Actavis Pharma, Inc., f/k/a Watson Pharma, Inc.:**

Steven A. Reed  
Harvey Bartle IV  
Jeremy A. Menkowitz  
MORGAN, LEWIS & BOCKIUS LLP  
1701 Market Street  
Philadelphia, PA 19103

**For Defendants- Cephalon, Inc., Teva Pharmaceuticals USA, Inc., Watson Laboratories, Inc., Actavis LLL, and Actavis Pharma, Inc., f/k/a Watson Pharma, Inc.:**

Brian M. Ercole  
MORGAN, LEWIS & BOCKIUS LLP  
200 S. Biscayne Blvd., Suite 5300  
Miami, FL 33131

**For Defendants Janssen Pharmaceuticals, Inc., Johnson & Johnson, Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc., and Ortho-McNeil-Janssen Pharmaceuticals, Inc., n/k/a Janssen Pharmaceuticals, Inc.:**

Benjamin H. Odom, OBA No. 10917  
John H. Sparks, O  
BA No. 15661  
ODOM, SPARKS & JONES PLLC  
HiPoint Office Building  
2500 McGee Drive Ste. 140  
Oklahoma City, OK 73072

**For Defendants Janssen Pharmaceuticals, Inc., Johnson & Johnson, Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc., and Ortho-McNeil-Janssen Pharmaceuticals, Inc., n/k/a Janssen Pharmaceuticals, Inc.:**

Charles C. Lifland  
Jennifer D. Cardelus  
O'MELVENY & MYERS LLP  
400 S. Hope Street  
Los Angeles, CA 90071

**For Defendants Janssen Pharmaceuticals, Inc., Johnson & Johnson, Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc., and Ortho-McNeil-Janssen Pharmaceuticals, Inc., n/k/a Janssen Pharmaceuticals, Inc.:**

Stephen D. Brody  
O'MELVENY & MYERS LLP  
1625 Eye Street NW  
Washington, DC 20006

# **EXHIBIT B**

# STATE BAR OF TEXAS



*Office of the Chief Disciplinary Counsel*

February 28, 2018

Re: Andrew Gordon Pate, State Bar Number 24079111

To Whom It May Concern:

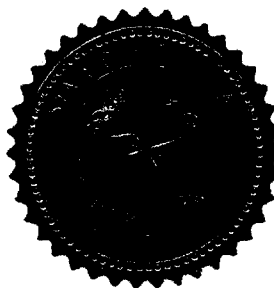
This is to certify that Andrew Gordon Pate was licensed to practice law in Texas on November 04, 2011, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension from the practice of law.

This certification expires 30 days from the date, unless sooner revoked or rendered invalid by operation of rule or law.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Acevedo", with a stylized flourish at the end.

Linda A. Acevedo  
Chief Disciplinary Counsel  
LA/web



# **EXHIBIT C**



## Certificate of Compliance

Oklahoma Bar Association  
1901 North Lincoln Boulevard  
Post Office Box 53036  
Oklahoma City, Oklahoma 73152-3036

The Oklahoma Bar Association, in response to the application of out-of-state attorney, submits the following certificate pursuant to 5 O.S. Ch.1 App.1, Art. II

1. Applicant has submitted a signed application of out-of-state attorneys, certificate(s) of good standing, and the non-refundable application fee pursuant to the Rules Creating and Controlling the Oklahoma Bar Association, 5 O.S. Ch. 1, App. 1, Art. II.
2. Date of Application: **March 6, 2018**
3. Application Number: **2018-104**
4. Applying Attorney: **Andrew Gordon Pate**  
**Nix, Patterson & Roach, LLP**  
**3600 N. Capital of Texas Hwy., Bldg. B, Suite 350**  
**Austin, TX 78746**
5. The Application was: **GRANTED**

Dated this 6th day of March, 2018.



Gina L. Hendryx, General Counsel  
Oklahoma Bar Association