



IN THE DISTRICT COURT OF CLEVELAND COUNTY  
STATE OF OKLAHOMA

STATE OF OKLAHOMA } S.S.  
CLEVELAND COUNTY }  
**FILED**

MAR 15 2018

In the office of the  
Court Clerk MARILYN WILLIAMS

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

Plaintiff,

vs.

Case No. CJ-2017-816

PURDUE PHARMA L.P., et al,

Defendants.

**DEFENDANTS JANSSEN PHARMACEUTICALS, INC.  
AND JOHNSON & JOHNSON'S INITIAL WITNESS DISCLOSURES**

Pursuant to the Court's Scheduling Order dated January 29, 2018, Janssen Pharmaceuticals, Inc., its predecessor companies Ortho-McNeil-Janssen Pharmaceuticals, Inc. and Janssen Pharmaceutica, Inc. (jointly, "Janssen"), and its parent company Johnson & Johnson ("J&J") make the following initial witness disclosures.

J&J and Janssen identify the following individuals they believe are likely to have discoverable information that J&J and Janssen may use to support its claims or defenses. J&J and Janssen have in good faith listed the probable general subject matters of each witness's knowledge, but this general description is not intended to limit the information that each witness may provide. Current and former employees and agents of J&J and Janssen should be contacted through defense counsel. J&J and Janssen's list of individuals likely to have discoverable information does not include expert witnesses, nor individuals that J&J and Janssen would use solely for impeachment purposes. Janssen reserves the right to supplement this list of witnesses as discovery proceeds.

1. State employees and agents. J&J and Janssen believe these individuals are likely to have knowledge about, inter alia, Plaintiff's alleged reimbursement and coverage or actuarial decisions concerning Nucynta, Nucynta ER, and Duragesic.

2. Members and beneficiaries. J&J and Janssen believe State employees, retirees, or other members or beneficiaries of its health plan(s) or workers' compensation program who were allegedly prescribed Nucynta, Nucynta ER, or Duragesic are likely to have knowledge about, inter alia, the alleged prescriptions written and received, including their efficacy.

3. Benefits staff. J&J and Janssen believe Plaintiff's pharmacy benefit managers or third-party claims administrators are likely to have knowledge about, inter alia, Plaintiff's alleged reimbursement and coverage or actuarial decisions concerning Nucynta, Nucynta ER, and Duragesic.

4. Third parties. J&J and Janssen believe employees of any third party entity who prepared and/or disseminated what is referred to in Plaintiff's Complaint or identified during discovery as "unbranded" marketing materials are likely to have knowledge relating to the allegations made in this lawsuit and J&J and Janssen's defenses.

5. Health care professionals. J&J and Janssen believe that health care providers who received materials Plaintiff attributes to J&J and/or Janssen regarding the use of opioids or the treatment of chronic non-cancer pain and/or prescribed opioid products reimbursed directly or indirectly by Plaintiff, have knowledge relating to the allegations made in this lawsuit and J&J and Janssen's defenses.

6. David Biondi. Former Therapeutic Area Lead, Janssen. Contact information: c/o O'Melveny & Myers LLP, 400 South Hope Street, 18th Floor, Los Angeles, CA 90071-2899, (213) 430-6000. This individual may have knowledge relating to clinical trials, FDA approval of Nucynta

and Nucynta ER, risk evaluation and mitigation strategies for opioid products, and promotional materials related to Nucynta and Nucynta ER.

7. Kati Chupa. Former Vice President of Primary Care Marketing, Janssen. Contact information: c/o O'Melveny & Myers LLP, 400 South Hope Street, 18th Floor, Los Angeles, CA 90071-2899, (213) 430-6000. This individual may have knowledge relating to marketing and sales of Nucynta, Nucynta ER, and Duragesic.

8. Frank DeMiro. Director, Established Products Group, New Business Development & Alliance Management, Janssen. Contact information: c/o O'Melveny & Myers LLP, 400 South Hope Street, 18th Floor, Los Angeles, CA 90071-2899, (213) 430-6000. This individual may have knowledge relating to interactions with professional organizations and physicians regarding opioid products, and promotional efforts regarding Nucynta and Nucynta ER.

9. Michael Kaufman. Director of Regulatory Affairs, Janssen. Contact information: c/o O'Melveny & Myers LLP, 400 South Hope Street, 18th Floor, Los Angeles, CA 90071-2899, (213) 430-6000. This individual may have knowledge relating to FDA approval and regulation of Nucynta and Nucynta ER, communications with FDA, and risk evaluation and mitigation strategies for Nucynta and Nucynta ER.

10. Ron Kuntz. Product Director, Janssen. Contact information: c/o O'Melveny & Myers LLP, 400 South Hope Street, 18th Floor, Los Angeles, CA 90071-2899, (213) 430-6000. This individual may have knowledge relating to FDA approval of, and promotional efforts regarding, Nucynta and Nucynta ER.

11. Roxanne McGregor-Beck. Director of Regulatory Advertising & Promotion, Janssen. Contact information: c/o O'Melveny & Myers LLP, 400 South Hope Street, 18th Floor, Los Angeles, CA 90071-2899, (213) 430-6000. This individual may have knowledge relating to Duragesic promotional efforts as well as knowledge relating to FDA approval and regulation of Nucynta and

Nucynta ER, promotional materials regarding Nucynta and Nucynta ER, and speakers' bureau programs regarding Nucynta and Nucynta ER.

12. Greg Panico. Senior Director Research and Development Communications, Janssen. Contact information: c/o O'Melveny & Myers LLP, 400 South Hope Street, 18th Floor, Los Angeles, CA 90071-2899, (213) 430-6000. This individual may have knowledge relating to interactions with professional organizations and patient advocacy groups and promotional efforts regarding Nucynta and Nucynta ER.

13. Lori Parisi. Director of Scientific Communications, Janssen. Contact information: c/o O'Melveny & Myers LLP, 400 South Hope Street, 18th Floor, Los Angeles, CA 90071-2899, (213) 430-6000. This individual may have general knowledge relating to continuing medical education programs.

14. Hany Rofael. Associate Director, Clinical Development, CNS Medical Affairs, Janssen. Contact information: c/o O'Melveny & Myers LLP, 400 South Hope Street, 18th Floor, Los Angeles, CA 90071-2899, (213) 430-6000. This individual may have knowledge relating to pharmacovigilance for the Nucynta franchise, adverse events for opioid products, and risk evaluation and mitigation strategy for opioid products.

15. Fred Tewell. Director of Marketing, Janssen. Contact information: c/o O'Melveny & Myers LLP, 400 South Hope Street, 18th Floor, Los Angeles, CA 90071-2899, (213) 430-6000. This individual may have knowledge relating to sales and marketing, including sales representatives' interactions with physicians regarding Nucynta and Nucynta ER and the divestiture of the U.S. Nucynta franchise.

16. Scott Trembley. Product Director, Established Products Group, Janssen. Contact information: c/o O'Melveny & Myers LLP, 400 South Hope Street, 18th Floor, Los Angeles, CA

90071-2899, (213) 430-6000. This individual may have knowledge relating to legacy sales of Duragesic.

17. Gary Vorsanger. Senior Director for Clinical Development, Janssen. Contact information: c/o O'Melveny & Myers LLP, 400 South Hope Street, 18th Floor, Los Angeles, CA 90071-2899, (213) 430-6000. This individual may have knowledge relating to clinical trials, adverse events, and interactions with physicians regarding, and FDA approval of, Nucynta and Nucynta ER.

Respectfully Submitted,



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INC., AND  
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**CERTIFICATE OF MAILING**

Pursuant to Okla. Stat. tit. 12, § 2005(D), this is to certify on March 15<sup>th</sup>, 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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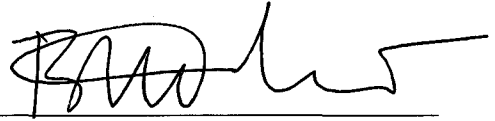
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