



Plaintiff, the State of Oklahoma (the “State”) files this Fourth Motion to Compel Discovery (“Motion”) from Defendants Purdue Pharma L.P., Purdue Pharma Inc., and The Purdue Frederick Company Inc. (“Purdue” or the “Purdue Defendants”), pursuant to 12 OKLA. STAT. §3237, and respectfully shows the Court the following in support.

## **I. INTRODUCTION**

In its Petition, the State seeks relief in the form of “Punitive damages” and “Disgorgement of Defendants’ ill-gotten gains” through a claim of unjust enrichment. Petition at 31, 32. Both claims for relief require consideration of Defendants’ profits related to the sale of opioids. The State’s Interrogatory No. 2 asks the Purdue Defendants to “[s]tate the amounts of gross revenue and net profits earned by You from the sale of opioids in Oklahoma.” Purdue claims it does not track revenue and profit at the state level. Purdue has wholly refused to answer this this interrogatory or otherwise engage in a substantive discussion with the State about how Purdue may satisfy its obligations under this interrogatory.

## **II. FACTUAL BACKGROUND**

On April 3, 2018 the parties held a meet and confer on Purdue’s objections to the State’s Interrogatories. With respect to Interrogatory No. 2, Purdue’s counsel stated that Purdue does not have responsive information to the interrogatory “as written” because Purdue does not track revenue and profits at the state level. Purdue acknowledged that it does track revenue and profit at a national level but was unwilling to provide the information in that form because the interrogatory “as written” only asks for revenue and profit earned in Oklahoma.

The parties met again on April 10, 2018 but Purdue was unwilling to discuss alternatives or compromises or provide any responsive information. Purdue simply suggested that the State send a new interrogatory request for its consideration but would provide zero guidance about how

such an interrogatory should be drafted to meet Purdue's semantical satisfaction. Rather than attempt a good-faith compromise, Purdue asks the State to take a shot in the dark and needlessly waste interrogatories. For the reasons described herein, Purdue's response is insufficient. The State now files this motion to compel.

### III. LEGAL STANDARD

Courts liberally construe the Discovery Code to provide the just, speedy and inexpensive determination of every action. 12 OKLA. STAT. §3225. "Parties may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of any other party." *Id.* at §3226(B)(1).

Under the Oklahoma Discovery Code, "[a]ny party may serve upon any other party written interrogatories to be answered by the party served..... *Id.* at §3233(A). Each interrogatory shall be answered separately and fully in writing under oath, unless it is objected to, in which event the objecting party shall state the reasons for objection and shall answer to the extent the interrogatory is not objectionable." *Id.* **However, it is not a proper response to an interrogatory to simply say, "we don't have this exact information in the exact way you've asked for it, and so we don't have to provide any answer."** See *Oklahoma v. Tyson Foods, Inc.*, 262 F.R.D. 617, 629 (N.D. Okla. 2009). When a party fails to completely respond to discovery requests or produce materials "as requested," the requesting party "may apply for an order compelling discovery." 12 OKLA. STAT. §3237(A).

### IV. ARGUMENT & AUTHORITIES

State's Interrogatory No. 2 is limited in scope to revenue and profits earned by the Purdue Defendants from the sale of opioids in Oklahoma. It is undisputed that this information is relevant

to the State's claims. Nevertheless, Purdue refuses to provide *any* information because Purdue claims that it only tracks revenue and profit at the national level—whereas the interrogatory “as written” only asks for information from Oklahoma. Throughout multiple meet-and-confers, Purdue refused the State's offers to compromise. Rather, Purdue simply proposed that the State send a new interrogatory for its consideration.

Purdue continues to take an unreasonable binary approach to discovery in this case. Either it is able respond to the request precisely “as written,” or it refuses to provide any information at all. Here, Purdue's refusal to provide *any* revenue and profit information to the State is unresponsive and inappropriate.

“In the interest of narrowing the issues and ascertaining the facts relevant thereto, the Court should not permit answers to interrogatories that are incomplete, inexplicit and unresponsive. . . . The answers to interrogatories must be responsive, full, complete and unevasive. The answering party cannot limit his answers to matters within his own knowledge and ignore information immediately available to him or under his control. . . . If an appropriate interrogatory is propounded, the answering party will be required to give the information available to him, if any, through his attorney, investigators employed by him or on his behalf or other agents or representatives, whether personally known to the answering party or not. . . . ***If the answering party lacks necessary information to make a full, fair and specific answer to an interrogatory, it should so state under oath and should set forth in detail the efforts made to obtain the information. . . .***”

*State ex rel. Protective Health Servs. v. Billings Fairchild Ctr., Inc.*, 2007 OK CIV APP 24, ¶ 19, 158 P.3d 484, 490 (quoting *Miller v. Doctor's General Hosp.*, 76 F.R.D. 136 (W.D. Okla. 1977)) (emphasis added)

Thus, Purdue must provide the responsive information it does have. If that information is not exactly in the form requested in the interrogatory, Purdue can state that in its response. If Purdue lacks necessary information to make a full, fair and specific answer, Purdue should so state under oath and should explain in detail the efforts it made to obtain the information.

Indeed, the State proposed this exact compromise to no avail.

**MR. PATE:** We are trying to meet and confer and ask you what information you have. If you have -- if your client only has information about a region or at the highest level nationally, then what I would suggest is that you all respond and answer the interrogatory with that information and qualify it however you need to make clear that this is this level of information and this is as narrow as we track it and as narrow as we are able to or as granular as we are able to state our revenue and profits information for opioids, and you can say that, and that's an answer to this interrogatory. We don't believe we are required to send a new interrogatory.

**MR. HOFF:** This is Rob. I think the issue we may have with that, although I'm happy to talk to our client about it, is that then you start getting into issues of discoverability; in other words, when you ask for financial information for Oklahoma, where this litigation relates to Oklahoma, I understand that request even though we don't have responsive information **the way you have asked for it**. But then when you say, well, just give us anything you have or as close as you can get on these financial metrics then we have to start thinking about, you know, other objections we might have including, you know, being beyond the scope of discoverable information for this case.

Exhibit A, (April 10, 2018 meet and confer transcript at 15:9-16:10.) Thus, Purdue's position is that it does not have the information the as the State has requested, but Purdue is unwilling to provide the information it does have.

The Purdue Defendants' *only* proposal was that the State could send a new interrogatory for their consideration. This proposal is disingenuous and unworkable for several reasons.

*First*, if the State were to ask for revenue and profits for sales of opioids nationwide—or any area broader than Oklahoma—Purdue would object to the geographic scope of the request. Indeed, Purdue asserted a geographic scope objection to every one of the State's interrogatories not limited to the State of Oklahoma. Further, as shown above, Purdue's counsel even acknowledged the likelihood of the objection during the same meet-and-confer where they proposed a new interrogatory. Ex. A at 15:22-16:10.

*Second*, it is not a proper response to an interrogatory to simply say, as the Purdue Defendants have, "we don't have this exact information in the exact way you've asked for it, and

so we don't have to provide any answer." See *Oklahoma v. Tyson Foods, Inc.*, 262 F.R.D. 617, 629 (N.D. Okla. 2009). Moreover, "a corporation's response to interrogatories is not limited to information maintained in the ordinary course of business." *Id.* Rather, "[t]he corporation 'must furnish the information available to the party.'...". *Id.*

*Third*, the State does not know how Purdue keeps its data. Only Purdue knows. Thus, the State cannot be expected to craft interrogatories that perfectly conform to Purdue's own descriptions of its financial record keeping. Indeed, Purdue was unwilling to provide the State with any insight into how to craft an interrogatory that Purdue would find unobjectionable. Rather, Purdue would prefer the State to take a shot in the dark. As discussed above, Purdue's obligation is to provide the responsive information it has available. If that information cannot be provided in response to the request exactly "as written," Purdue can state that. What Purdue cannot do is expect the State to burn through its limited number of interrogatories trying to pose the precise interrogatory that Purdue *might* be willing to answer.

## V. CONCLUSION

The Purdue Defendants' objections are denying the State access to *any* information related to the revenue and profits earned by Purdue from the sale of opioids. It is clear that there is no interrogatory on this subject that Purdue would be willing to answer. The State respectfully requests that the Court overrule the Purdue Defendants' objections and order them to substantively respond to State's Interrogatory No. 2 with the information they have available to them. Further, if the only responsive information Purdue has is for an area broader than Oklahoma, the State would ask that the Court overrule any relevance objections and order Purdue Defendants to produce the information they have available.

Dated: April 27, 2018



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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, § Case No. CJ-2017-816  
§ Judge Thad Balkman  
Plaintiff, §  
§  
v. § Special Master:  
§ William Hetherington  
PURDUE PHARMA L.P., et §  
al., §  
§  
Defendants. §

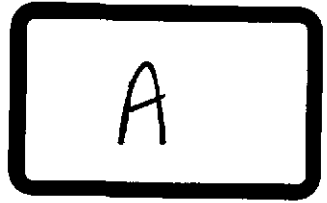
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DISCOVERY CONFERENCE BETWEEN THE PARTIES  
(Via Telecommunications)  
April 10, 2018

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DISCOVERY CONFERENCE BETWEEN THE PARTIES, taken  
in the above-styled and numbered cause on  
April 10, 2018, from 3:05 p.m. to 3:54 p.m., reported  
by machine shorthand by JOSEPH D. HENDRICK, CSR in and  
for the State of Texas, and the following telephonic  
proceedings were had, to-wit:

Job No. 2863506  
Pages 1 - 39



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1 THE REPORTER: I have 3:05 p.m. and we are  
2 on the record.

3 MR. PATE: Thank you. This is Drew Pate  
4 with Nix Patterson. We've got Trey Duck, Ross  
5 Leonoudakis and Cody Hill for the plaintiff. We are  
6 here to just follow up on certain items discussed at a  
7 meet and confer with Purdue last week, April 3rd, 2018.

8 MR. LaFATA: This is Paul LaFata from Quinn  
9 Emanuel for Purdue.

10 MR. TAHERI: This is Sean Taheri from Quinn  
11 Emanuel for Purdue.

12 MS. DALTON: This is Athena Dalton from  
13 Quinn Emanuel for Purdue.

14 MR. BURNS: This is Josh Burns from Crowe &  
15 Dunlevy for Purdue.

16 MR. HOFF: And it's Robert Hoff from Wiggin  
17 and Dana for Purdue.

18 MR. LaFATA: Drew, did you want to start  
19 with the things you had in mind? And then we can go to  
20 our follow-up.

21 MR. PATE: Sure, that's fine. This is  
22 Drew.

23 So one of the -- I'll just go down the list  
24 of items that we had talked about last week that we  
25 understood you-all were going to go gather more

1 information about or at least try to gather more  
2 information about and let us know kind of where you're  
3 at.

4 So the first related, we had a couple of  
5 questions in relation to the State's Interrogatory  
6 Number 2 for information about the profits and revenue  
7 generated from the sale of opioids in Oklahoma. And I  
8 know, Robert, I believe you were the one primarily  
9 talking at the time, said that you were going to go  
10 look into what additional information might be  
11 available at Purdue to answer this interrogatory. So  
12 can you tell us where you're at on that?

13 MR. HOFF: Yes. I did reach out to a  
14 number of people at Purdue and what I continue to  
15 understand and be told is that we really don't have a  
16 way to precisely and accurately convey or determine,  
17 really, net revenue and gross profit - if I remember  
18 correctly, that was how it was worded, but essentially  
19 financial information resulting from prescriptions in a  
20 particular state. There's obviously prescription  
21 information in states and there is information about  
22 prescriptions that were made by Oklahoma HCPs and we do  
23 plan to produce that information, but that is not, in  
24 turn, tied to, you know, precise financial metrics by  
25 which we can answer this interrogatory.

1 MR. PATE: So what information do you have  
2 about revenues and profits that you can provide to  
3 answer the interrogatory?

4 MR. HOFF: Well, we wouldn't be able to  
5 answer a verified interrogatory based on the  
6 information I currently have and understand. I  
7 wouldn't be able to answer and verify an interrogatory  
8 that provides gross revenue and net profits from the  
9 sale of Purdue's opioids in Oklahoma. I mean, there --  
10 there are a number of challenges in trying to determine  
11 that information even if we start with the  
12 prescriptions that were made in the state. You know,  
13 among other things, to determine profits, you'd have to  
14 determine, you know, costs and expenses that are  
15 allocated to prescriptions in a state, and we just  
16 don't have the ability to do that, and anything we  
17 would try to do in response to an interrogatory that we  
18 would have to verify, I just don't know how we could  
19 ever get anybody to verify that the information is, you  
20 know, accurate because we don't think we can be  
21 accurate and we don't think we can be precise.

22 MR. PATE: This is Drew. I hear what you  
23 are saying about, you know, what information they have  
24 about Oklahoma and wanting to be precise about Oklahoma  
25 and I appreciate that since that's what the

1 interrogatory specifically requested. But if -- you  
2 know, as we discussed last week, if you don't have that  
3 information, you know, the question is what information  
4 about revenue and profits do you have that can provide  
5 some response and some answer to this interrogatory?  
6 And I think however you guys have to explain what you  
7 have in your answer and, you know, that's -- that's  
8 fine, I mean, if you have to explain that This isn't  
9 limited to Oklahoma, here's our revenue and profits  
10 related to, you know, this geographic region which  
11 includes, you know, Oklahoma, Texas, Arkansas, you  
12 know, whatever the answer is -- I obviously don't know  
13 what the answer is going to be, but -- or even if it is  
14 on a national level, you know, you can explain that in  
15 your answer, as, you know, as far as however granular  
16 the company is capable of answering the question and  
17 that will potentially resolve the issue. But I don't  
18 think if -- if what -- if what we're ultimately getting  
19 at here is you guys say we don't know exactly what we  
20 made in Oklahoma so we're not going to answer at all,  
21 then, you know, we obviously disagree that that is an  
22 adequate response.

23 So are you trying to figure out -- or maybe  
24 I should ask the question differently:

25 What granular level does Purdue have



1 revenue and profits information about its opioid sales?

2 MR. HOFF: So the problem or the challenge  
3 with answering that question is that the interrogatory  
4 in front of us is for the information in Oklahoma.  
5 This litigation is brought by the State of Oklahoma and  
6 that's what we are responding to. So I don't know all  
7 of the different ways that we might be able to, you  
8 know, look at revenue and profits; I just know that we  
9 can't do it the way that your interrogatory has asked  
10 for it. Obviously, there is national financial data,  
11 there's sort of company-wide financial data, but that's  
12 not what this interrogatory is asking for.

13 MR. PATE: Okay. So just so I am clear,  
14 you know, we asked during the last meet and confer for  
15 you guys to look into this and find out, you know, what  
16 information is available that could respond to this  
17 interrogatory, what granular level Purdue does have  
18 revenue and profits information. Are you telling me  
19 now you are not going to provide that information and  
20 you're just going to refuse to answer the  
21 interrogatory?

22 MR. HOFF: No, I don't think that's what  
23 I've said at all.

24 MR. PATE: Okay. It sounds like -- this is  
25 Drew. It sounds like that's what you are saying to us.

1 It sounds like a message that we've heard before from  
2 you guys that you haven't asked for this in exactly the  
3 way that we have it and so looking at what you've sent  
4 us, we're not responding, or, you know, we think it's  
5 improper. You know, we've heard that response from  
6 Paul and now we are hearing it from you on different  
7 issues and, you know, this is not a very effective way  
8 to go through a meet and confer process in our view.  
9 If -- we're trying to get an answer to the question,  
10 we're trying to figure out what information you guys do  
11 have that will answer the question and we're asking  
12 this in good faith to try to reach a resolution. But  
13 if we are just going to hear, "We don't have it exactly  
14 like you've asked for it and so that's it, we're done,"  
15 then we can file a motion on it and tee it up.

16 MR. HOFF: I don't think that's a fair  
17 characterization of what we are saying. I think that  
18 you are asking for information about revenue and net  
19 profits for the sale of opioids in Oklahoma which, you  
20 know, I think is sort of a fair request; I just don't  
21 have that information. We don't have that information  
22 and we don't feel that we can accurately answer it.  
23 You are now asking us in the meet and confer process,  
24 you know, what level of granularity can you provide?  
25 That's just an open ended question that I really don't

1 know how to answer. I imagine any company can look at  
2 financial data a lot of different ways but one thing I  
3 do know is we don't look at it and we can't calculate  
4 it based on a state and I am not sure we can do it on a  
5 regional basis either. I could go and ask that  
6 question, but I think we would face the same challenges  
7 that we have at a state level.

8 MR. DUCK: This is Trey Duck for the state.  
9 Let's back up and see if we can get on the same playing  
10 field for what exactly these meet and confers are  
11 supposed to be.

12 Now, maybe the best way to do that is for  
13 me to ask a simple question of you-all. Do you-all  
14 view the meet and confer process as an opportunity for  
15 the parties to reach a compromise on discovery issues?

16 MR. LaFATA: This is Paul. I -- I don't  
17 understand why we're having a conversation kind of  
18 about the philosophy of meet and confer. I mean, yes  
19 they are. The purpose of them is to understand each  
20 other's requests and look for opportunities to resolve  
21 kind of open questions. We have spent two meet and  
22 confers in good faith trying to tell you exactly what  
23 Purdue can answer about this interrogatory and we  
24 looked into it when we answered it and we met and  
25 conferred, we went and looked back to see if there's

1 anything else we can do to answer this and we have  
2 stated what the answer is. If you want to reformulate  
3 an interrogatory and change the content of it and serve  
4 a new one, that is a different discussion. We are  
5 trying to answer the interrogatory. And I said before,  
6 and I just repeat, that we're not trying to dance  
7 around technicalities of language and we are really not  
8 doing that and that is part of I think, Trey - I think  
9 it was Trey was speaking - Trey, to your point, about  
10 trying to resolve it; so if there is a question about  
11 what does net sales mean or whatever the -- I don't  
12 have the language in front of me to use, that's not  
13 going on. But if you want to change the scope so it's  
14 really -- it's no longer Oklahoma, that's a different  
15 interrogatory.

16 MR. DUCK: So there's a lot in there and,  
17 you know, I'll try to get to as much of it as I can.

18 But first, Paul, it is important that we  
19 have an understanding about what these meet and confers  
20 are for and that we have an agreement or an  
21 understanding of how you view them. I don't believe  
22 there's any philosophy involved. But every question  
23 that Drew has asked has been geared towards trying to  
24 understand how we can reach a compromise, and it  
25 appears to us, based on the first 5 or 10 minutes of

1 this meet and confer, and the entirety of Purdue's  
2 engagement in the meet and confer on the depositions,  
3 that you view this as a binary process: Either you can  
4 perform or respond to the discovery requests for the  
5 deposition notice exactly as written, or there is  
6 nothing that you can do. And that means that these,  
7 these meet and confers are a waste of the parties' time  
8 and ultimately the court's time having to read these  
9 transcripts. You-all can just email us and say We  
10 don't have it and we're not going to do anything to  
11 compromise on it, send us a different request.

12 So what we are trying to do is find where  
13 the common ground is. If you-all don't want to  
14 participate in that process, just tell us. But we  
15 don't think that's meeting and conferring in good  
16 faith, and, if you-all don't want to do it, we can't  
17 force you to, but we can just go to the court  
18 immediately and cut this whole procedure out of the  
19 process.

20 So, you know, if you-all don't want to try  
21 to find common ground, fine; just tell us. But here's  
22 the thing: You want us to send you a reformulated  
23 discovery request - or at least you say that's a  
24 potential option - but you can't answer any questions  
25 that will allow us to phrase the discovery requests in

1 a manner that satisfies you-all. So, you know, you  
2 can't offer us a potential solution without explaining  
3 to us how that solution will work. That's not good  
4 faith.

5 So if you can't provide us any detail at  
6 all about the kind of financial information that Purdue  
7 does have on hand such that we can ask you a discovery  
8 request that you can respond to, then it's pointless to  
9 suggest to us that we send you a new discovery request.

10 MR. HOFF: Trey, this is Robert Hoff. I  
11 just -- you know, I -- we always come to these meet and  
12 confers in good faith. We absolutely agree that we  
13 should be trying to work out our differences. Given  
14 what you said, I do have to point out that - and I'm  
15 sorry if I've not been involved in every conversation  
16 about this case - but after the very first meet and  
17 confer that I was involved in about the discovery, the  
18 document requests, I think you went and filed a motion  
19 to compel the very next day or very shortly thereafter  
20 when we thought we were continuing to meet and confer  
21 and offered to continue to meet and confer. So I think  
22 your point is well taken, but it's a little misplaced.

23 MR. PATE: I don't think we -- look, I'm  
24 not going to argue with you about that history. That  
25 was taken up by the court and addressed at the hearing

1 and, you know, we don't agree with your  
2 characterization, but you're certainly entitled to it.

3 Look. Here's the deal. We obviously --  
4 you guys think that we should send, at least it seems  
5 to us - I'm sorry, this is Drew talking now - it seems  
6 to us that you think we have to -- that you've fully  
7 answered this interrogatory already, which is a non  
8 answer. To be clear, your answer says you are  
9 objecting and you're not providing an answer and that  
10 you are not willing to supplement it and that you are  
11 suggesting that if we want any revenue and profit  
12 information about Purdue's sale of opioids, we need to  
13 send you a new and different discovery request, but  
14 you're not providing any other additional information  
15 about what revenue and profit information is available  
16 at Purdue currently. Is that right?

17 MR. LaFATA: This is Paul. Let me suggest  
18 this. First, I think we can update the response to the  
19 interrogatory to reflect what we've talked about; and  
20 second, consistent with what I think -- I think it was  
21 Trey who was saying about trying to find, you know, a  
22 way to cut this. We can take a request from you if you  
23 want to, you know, adjust the content of it and see  
24 where that gets us. What I think I'm hearing is you  
25 want to see if this is -- if we would respond to one on

1 a national level, which is a different thing. So  
2 what -- and I take your point about trying to kind of  
3 cut it short and get to it. We can -- if that's sort  
4 of what you are requesting, we can take that back and  
5 see where that gets us. But we were and we have been  
6 operating in response to what we have in front of us  
7 and that's what we've been doing.

8 MR. PATE: We're not revising or amending  
9 the interrogatory. We are trying to meet and confer  
10 and ask you what information you have. If you have --  
11 if your client only has information about a region or  
12 at the highest level nationally, then what I would  
13 suggest is that you-all respond and answer the  
14 interrogatory with that information and qualify it  
15 however you need to to make clear that this is this  
16 level of information and this is as narrow as we track  
17 it and as narrow as we are able to or as granular as we  
18 are able to state our revenue and profits information  
19 for opioids, and you can say that, and that's an answer  
20 to this interrogatory. We don't believe we are  
21 required to send a new interrogatory.

22 MR. HOFF: This is Rob. I think the issue  
23 we may have with that, although I'm happy to talk to  
24 our client about it, is that then you start getting  
25 into issues of discoverability; in other words, when



1 you ask for financial information for Oklahoma, where  
2 this litigation relates to Oklahoma, I understand that  
3 request even though we don't have responsive  
4 information the way you have asked for it. But then  
5 when you say, well, just give us anything you have or  
6 as close as you can get on these financial metrics,  
7 then we have to start thinking about, you know, other  
8 objections we might have including, you know, being  
9 beyond the scope of discoverable information for this  
10 case.

11 MR. PATE: Yeah, so y'all just tell us what  
12 your -- look guys, we need to know what your position  
13 is on this interrogatory. Are you going to provide  
14 more information or are you not, and are you going to  
15 object to the interrogatory if -- instead of providing  
16 anything broader than Oklahoma? Because that's what it  
17 sounds like to us.

18 MR. HOFF: So I think that's the --

19 MR. LaFATA: I think --

20 MR. HOFF: Go ahead, Paul.

21 MR. LaFATA: I'm just going to add, I think  
22 we can update the response to, like I said before - so  
23 I'm repeating myself, so pardon me - but I think we can  
24 update the response to reflect what we've been talking  
25 about here so you have an answer to the interrogatory

1       which you -- and, you know, you chose how to frame it,  
2       we're -- you know, we're happy to talk about  
3       adjustments to it, I think I heard you say you're not  
4       going to make adjustments so it -- and you may change  
5       your mind on that, which is fine, but we -- we're happy  
6       to update the response so you have the response to what  
7       you sent.

8                       MR. PATE:  What we need to know, Paul -  
9       this is Drew - what we need to know, Paul or Robert, is  
10      whether or not you're going to provide any additional  
11      information in response to this interrogatory or if you  
12      are going to object to providing anything beyond what  
13      we have asked for.  Just so you know.  Are we going to  
14      get an answer that's actually an answer, or -- or not?

15                      MR. HOFF:  This is Rob.  And look, I'm  
16      sorry if we're playing semantics here.  It's not my  
17      intent.  But you have asked for the information a  
18      certain way.  Now what you are telling us is will you  
19      give us any other financial information?  That's just,  
20      you know, it's very vague and open ended as to what you  
21      would want us to do anyway.  I don't even know where to  
22      begin.  You know, do I talk to my client and say, you  
23      know, generally what financial information do you have  
24      about opioids and what can we provide to Oklahoma?  
25      That's not what's been requested and it's not something

1 we think would be -- you know, we'd at least very  
2 seriously think about an objection to a request like  
3 that.

4 MR. PATE: If that is the only information  
5 you're saying Purdue has, then that is what's been  
6 requested. Purdue has information about its revenue  
7 and profit in Oklahoma. It may not assign a variable  
8 to it or track it down to that granularity, but it has  
9 information relevant to getting an answer to this  
10 question and so that's what we are entitled to. And I  
11 absolutely think you need to go to your client and  
12 should already have gone to your client. I thought  
13 this is what we asked you to do last week, is to find  
14 out at what level do you track revenue and profits, and  
15 then you can tell us that and then we can try to work  
16 out a solution. But I asked this last week and you  
17 said it wasn't the right time to talk about  
18 hypotheticals because I expected this is the exact  
19 answer I would get, which is, once you say, Well, we  
20 only have that on a national level now we're objecting  
21 to relevance, we need to know that because we disagree;  
22 and if you're going to stand on that, then we just need  
23 to know that so that we can go to the court to get  
24 resolution on that. So what --

25 MR. HOFF: There's -- sorry.

1 MR. PATE: We just need to know your  
2 position.

3 MR. HOFF: First of all, there's a couple  
4 of premises built into what you just said, which are  
5 just not accurate and, since we're on the record, have  
6 I have to correct them. We did -- I did go to my  
7 client and talk to them about this as I said I was  
8 going to. And, you know, I think you said something to  
9 the effect of Purdue does have this information about  
10 Oklahoma. I'm telling you that we don't, and that we  
11 don't -- not only do we not track it that way, but we  
12 cannot accurately and precisely assign revenue and  
13 profit to prescriptions in a particular state. So we  
14 don't have the information.

15 MR. DUCK: This is Trey. I think I asked a  
16 question in the last meet and confer on this issue  
17 about whether or not Purdue received information from  
18 distributors related to where they received orders for  
19 prescriptions from. Were you able to get an answer on  
20 that?

21 MR. HOFF: I have information on that,  
22 which is that we do get some information from  
23 distributors that includes in some cases the identity  
24 of shipments to end users, to end customers, but it's,  
25 you know, possible that a distributor that, you know,

1 we have information from, you know, a distributor in  
2 one state that we, you know, that -- that purchases  
3 opioids from us, distributes them outside of the state  
4 that they're in. So we know who we sell our opioids  
5 to, we sell our opioids to distributors, but we can't  
6 then tie it to where does -- where do they distribute  
7 the products to? That depends on, you know, where  
8 prescriptions are, but we don't then have insight into,  
9 you know, from the time it leaves, you know, our hands,  
10 goes to the distributor and then gets distributed, you  
11 know, how does that tie to different states?

12 So we do have some financial data, you  
13 know, in terms of our relationships with distributors;  
14 but, again, the challenge is to get as precise as where  
15 did this prescription go and how much revenue and how  
16 much profit do we make from it?

17 The other -- the other piece of this that I  
18 mentioned already and I'll just repeat that the  
19 challenge is that, you know, Purdue sells several  
20 products, mostly opioids, as you know, but it sells  
21 other products, too, and its financial statement takes  
22 into account, you know, all of its activities, not just  
23 the sale of opioids, and it's -- the -- the metrics  
24 that go into things like net profits like the cost of  
25 goods sold is, you know, sort of company-wide; it's not

1 attributed to a certain product.

2 So, again, to calculate net profits for  
3 just opioids for a particular state, we just can't be  
4 precise to answer it in a verified interrogatory.

5 Are there ways to, you know, guesstimate  
6 and perform analyses? There might be, but they would  
7 never get us to a level where we can answer this  
8 interrogatory under oath.

9 MR. PATE: Okay, so just so I'm  
10 understanding this, are you -- well, we need to  
11 understand your position. This is Drew. We just need  
12 to understand your position on this interrogatory  
13 before we move on.

14 Is your answer that you don't have  
15 information related to Oklahoma profits and so you  
16 can't answer the interrogatory as phrased and you're  
17 not going to go get additional information or willing  
18 to provide any broader information in answering this  
19 interrogatory?

20 MR. HOFF: I think that if you formulated a  
21 request such that I knew what additional information  
22 you are asking for, we could formulate a response. I  
23 don't know what else to say, because, you know, your  
24 request for just additional information to try to help  
25 answer this, I don't even know where to go to get

1 additional information because I don't know what you  
2 are asking for other than what the interrogatory is.

3 MR. PATE: Okay. So your position is that  
4 we need to send a new request and you are not going to  
5 provide any additional information in response to this  
6 request, or this interrogatory.

7 MR. HOFF: I think our position is that it  
8 would be very helpful if you sent a new request so we  
9 understood better what else you might be looking for.

10 MR. PATE: Are you going to provide any  
11 additional response to this interrogatory? I'm  
12 entitled to an answer to that question, Robert. I'm  
13 not trying to be difficult. But we have to get clarity  
14 on what your position is on our request so that we know  
15 if we've got a dispute or not.

16 MR. HOFF: So I guess the answer is no  
17 because I don't believe we can accurately and  
18 truthfully and fully answer this interrogatory.

19 MR. PATE: Thank you. All right.

20 So the next issue that we had talked about  
21 last week that we asked you to follow up on related to  
22 Interrogatory Number 3 I believe where we requested  
23 identification of Purdue's sales reps, and you were  
24 going to look into whether or not the -- I know y'all  
25 are producing in part in response to that interrogatory

1 call notes, and we had asked whether those call notes  
2 would identify added sales reps or any other third  
3 party company sales reps and who those individuals  
4 were. So were you able to learn anything more about  
5 that?

6 MR. HOFF: I think this is Interrogatory 4.  
7 I thought you might have said 3, but I'm not sure.

8 MR. PATE: I may have misspoke.

9 MR. HOFF: Yeah, that's okay. But the  
10 answer is that our call notes do identify sales reps  
11 who made calls on our behalf, including outsourced  
12 sales reps and, so, to the extent that there were any,  
13 including for Abbott, then those would be identified in  
14 this -- in our call notes.

15 MR. PATE: All right. So they are included  
16 in the system. Are they identified in any separate way  
17 from Purdue's employed sales reps?

18 MR. HOFF: That, I don't know. I'm sorry,  
19 I just don't know that. I haven't seen that one way or  
20 the other, so, I'm sorry, I can't answer that. I can  
21 try to get you an answer. I could try to get you an  
22 answer, but I don't know.

23 MR. PATE: I would appreciate that. And  
24 while we're on this topic, I just got a notification  
25 that the password we received for the reproduction of



1 those call notes isn't working. Would one of you guys  
2 mind resending us the password for the disk that was  
3 produced with the new call notes?

4 MR. HOFF: Yeah, I don't know why -- I  
5 think this was our third production where I was told  
6 that your password is not working. Can you just ask  
7 your folks to type it in, if they're not typing it in,  
8 instead of copying and a pasting, if they can type it  
9 in and see if that works. But I will also follow up  
10 and make sure you have the right password.

11 MR. PATE: Yeah, I mean, I'll certainly ask  
12 that. I doubt that it's something as simple as that; I  
13 hope not, or I need to fuss at my people. But, we -- I  
14 mean, part of the issue we have is, I think -- and I  
15 understand why you want to separate the password from  
16 the production, but, you know, we get a disk and then  
17 we get a letter, and it's not always at least clear  
18 which letter relates to which disk or which drive and  
19 they come in at different times, or at least they have  
20 in the past. And so I'm not complaining about that,  
21 but I think that may be part of the issue as well that  
22 it's not clear to us always which password relates to  
23 which production. But -- or sometimes we get the  
24 passwords -- or haven't received the password yet after  
25 we have a production. So I'll find out about typing

1 versus copying and pasting if you will just  
2 double-check on what the password is for that most  
3 recent CD with the supplemental call note production.

4 MR. HOFF: Okay. And then I have the  
5 password in front of me, so I'll just have it re-sent.

6 MR. PATE: Thank you.

7 MR. HOFF: I could give it to you now, but  
8 it's really convoluted to read over the phone.

9 MR. PATE: No, that -- that's preferable.  
10 Thank you.

11 And in the original production of call  
12 notes, I know that you said there was an error in the  
13 fields that were copied over and I don't know if this  
14 is one of the errors or not - you know, as you can tell  
15 from my password question, we haven't been able to open  
16 the new production yet - but the original production  
17 did not include the names of the actual sales reps.

18 MR. HOFF: Yeah, that's the error, and yes,  
19 it does render that production kind of -- it kind of  
20 defeated the point if we didn't tell you the sales  
21 rep's name in the call notes. So.

22 MR. PATE: I was going to point that out,  
23 but thank you for acknowledging that.

24 MR. HOFF: Yeah. That was our supplemental  
25 production, so it should be fixed once the password

1 works and you can access that.

2 MR. PATE: Okay. And then another question  
3 related to the call notes that I think -- I think this  
4 came up last time and you were going to follow up on  
5 it, was whether or not you can provide a data  
6 dictionary or a list of the available fields of data  
7 that are included in the call notes. Our understanding  
8 was that it was an ex -- what we received was an export  
9 of certain fields and information and you were going to  
10 consider providing us with a list of all the different  
11 categories that can be included. So where are we at on  
12 that?

13 MR. HOFF: Yeah, so we're actually working  
14 on putting that together. Unfortunately, it's not just  
15 sort of a simple, you know, set of tables. It's a very  
16 convoluted Oracle database that I can't pretend to  
17 explain completely but we're trying to export that  
18 information to identify fields and try to put that  
19 together for you.

20 MR. PATE: Good. Thank you. When can you  
21 provide that? Any idea?

22 MR. HOFF: Well, we didn't get to all of  
23 this yet, but there are several things that we are  
24 trying to put together for a production probably next  
25 week so I will try to include that information to the

1 extent I can get it together with our -- with our  
2 production that we are planning for next week.

3 MR. PATE: Okay. Thank you.

4 MR. HOFF: We are also, by the way, aiming  
5 to make another production that's actually separate  
6 from the one that I just referred to by this Friday,  
7 which will include additional documents from our NDA  
8 files.

9 MR. PATE: Okay. Thank you.

10 MR. HOFF: You're welcome.

11 MR. PATE: Those are the only items I have  
12 on our list that we had asked you guys to follow up on  
13 and get back to us this week. So I appreciate the  
14 additional information.

15 MR. HOFF: Thank you.

16 MR. LaFATA: This is Paul. So are you --  
17 do want to shift over to what you guys learned with  
18 respect to your own interrogatories since we last  
19 spoke?

20 MR. PATE: Yes, if you'd like to. Go  
21 ahead.

22 MR. LaFATA: Yes. So, do we have any  
23 updates from you guys on what you have learned since  
24 our last call?

25 MR. PATE: So I've got that we -- we do

1 have some updates and I've got down here that you asked  
2 us to look into whether or not the health care  
3 authority processes essentially all claims, and Trey  
4 can speak to that, and, you know, who processes the  
5 claims for employees and retired employees and things  
6 like that. Was there anything else, though? That's  
7 all I have on my list that y'all had asked us to follow  
8 up on. Is there anything else?

9 MR. LaFATA: Yes. There was a question  
10 about your access to the records of the workers'  
11 compensation system.

12 MR. PATE: Right. I view that as part of  
13 that. Sorry if that wasn't clear.

14 MR. LaFATA: Okay. No problem.

15 MR. PATE: Go ahead, Trey.

16 MR. DUCK: This is Trey. So as I recall,  
17 Paul, you asked us to look into a couple of issues  
18 surrounding claims other than Medicaid claims. I view  
19 them as three separate categories: One for Department  
20 of Corrections prisoners; second one for workers'  
21 compensation; and a third for retired employees.

22 I will deal with them in turn.

23 Well, first, globally speaking, the  
24 Oklahoma Health Care Authority does not process any  
25 claims for any of those groups. That applies to all

1 three.

2 For Corrections, we do have some updated  
3 information. And let me just say we're going to  
4 provide you all of the information related to this.  
5 We're not standing on any objections related to, for  
6 instance, any redefinitions of terms that were used.  
7 If there's information that's responsive to your  
8 requests related to those three categories of documents  
9 or information, we are going to produce it. Okay. So  
10 that -- there was nothing intentional about not  
11 including that in our original discussion. We were  
12 just trying to understand the scope of your request,  
13 which I think that we achieved that on our last meet  
14 and confer.

15 With respect to Corrections, there -- there  
16 are no prescription claims for opioids there. Now,  
17 there could be some situations where there are  
18 inpatient -- you know, there's an inpatient, you know,  
19 provision of an opioid medication, it's not a  
20 prescription per se, and we are looking at those  
21 records and anything related to that to see if there's  
22 anything there we can produce. As far as addiction  
23 treatment is concerned, another thing we are looking  
24 into to see how that's handled and we are going to  
25 provide any information there as well, on the just

1 prescriptions standpoint, I mean, it's our  
2 understanding that there just aren't any, they don't  
3 administer opioids to prisoners I think for the very  
4 simple reason that they don't want to give imprisoned  
5 individuals mind-altering narcotics. But if there's  
6 anything else that's provided in a different setting  
7 but through Corrections, we're going to provide it.

8 Then for the workers' compensation  
9 situation, I mentioned to you that there is an Oklahoma  
10 kind of quasi-public entity that we don't represent.  
11 It's called CompSource. And CompSource is essentially  
12 a previous -- a previously state affiliated insurance  
13 mutual and we do not represent CompSource and if  
14 you-all want any information there, you'll have to  
15 subpoena them. If we wanted any information, we would  
16 have to subpoena them as well, is my understanding.  
17 The only CompSource related Oklahoma agency is the  
18 Oklahoma Workers' Compensation Commission, which is  
19 simply a non-judicial dispute entity that handles any  
20 workers' compensation disputes related to employees.  
21 But as far as the processing of any claims for workers'  
22 compensation, the state -- the state doesn't handle  
23 that; a third party does. So -- and OHCA does not  
24 handle it.

25 Lastly, on retired employees, the only

1 employee insurance program is HealthChoice. We have  
2 identified it before. Whether it was in response to a  
3 Purdue request or not I can't remember, but it -- we  
4 have certainly provided information to all defendants.

5 Drew tells me it was in response to one of  
6 your requests.

7 That is the -- that is the employee  
8 insurance program. We intend to produce all of that  
9 information, and, in fact, have made quite substantial  
10 progress in gathering it.

11 So that's the update there.

12 MR. LaFATA: This is Paul. Thank you,  
13 Trey, for going through that. I didn't want to -- I  
14 did not want to step in there when you were speaking,  
15 so I -- I want to go back and clarify a couple of  
16 things.

17 Starting with the Department of  
18 Corrections, I believe I heard you say that there were  
19 no prescriptions for opioids in -- in the entire  
20 Oklahoma Department of Corrections system. Is that  
21 what I -- did I understand that correctly?

22 MR. DUCK: I mean, I kind of want to leave  
23 myself the right to be wrong, but what we've -- what  
24 we've been told is that they do not administer  
25 prescriptions to inmates for opioids. So, you know,



1 there's no situation where a, you know, a prisoner goes  
2 to, you know, the nurse's office at the facility and  
3 takes their opioid.

4 MR. LaFATA: And I was wondering if that  
5 was based on having searched for it, for the  
6 information and found no results, or if it was  
7 something else.

8 MR. DUCK: It was based on conversations we  
9 had with the Department of Corrections. We -- they had  
10 a health care entity, you know, it's like a department  
11 within the agency that's familiar with all of the  
12 programs and all of their records and, you know,  
13 they've said We don't do that. So, there's nothing  
14 there.

15 MR. LaFATA: And then you mentioned that  
16 inpatient treatment may be -- maybe I misunderstood,  
17 but I thought you said that inpatient treatment may be  
18 handled differently. Was that right?

19 MR. DUCK: Yeah. And we're still running  
20 down information on that because it overlaps  
21 potentially with another agency and we're waiting to  
22 hear back, but yeah, I mean, I think that conceivably  
23 there could be a situation where someone who, you know,  
24 goes to prison, comes in off the streets, had some  
25 serious medical issues related to withdrawal or other

1 addiction problems, I don't think there is ongoing  
2 addiction treatment for inmates because, you know,  
3 they're incarcerated and therefore not exposed to, you  
4 know, falling back into addiction; but, to the extent  
5 there is any, you know, medical treatment related to  
6 addiction withdrawal, we are looking for that  
7 information and will produce it. I can tell you this:  
8 There is no medication assisted treatment for inmates,  
9 on -- you know, ongoing addiction treatment for  
10 inmates.

11 MR. LaFATA: And -- thank you.

12 MR. DUCK: And so on all of this stuff  
13 related to the Department of Corrections, whenever I  
14 say, you know, we're waiting to hear back on something  
15 and we're waiting to find out the exact specifics, just  
16 know we're not -- we don't intend to withhold anything  
17 that we find. We just are trying to run it down for  
18 you.

19 MR. LaFATA: Would you clarify, when I hear  
20 the phrase "inpatient," I sometimes think of, say, like  
21 surgery, if someone is hospitalized for a procedure.  
22 Is that what -- is that how you are using the term  
23 also, inpatient?

24 MR. DUCK: That -- no, that was a  
25 misstatement on my -- I just meant, you know, they'll

1 leave -- to the extent any prisoner would leave the  
2 prison facility and go to receive medical treatment  
3 somewhere, it could be outpatient as well. That's what  
4 we would be looking into there. And I think it's going  
5 to be very limited, Paul, at least as it relates to  
6 opioids. I'm sure they have other, you know, medical  
7 treatment just entirely unrelated to opioid. I think  
8 it will be fairly -- fairly limited, but we're going to  
9 provide it.

10 MR. LaFATA: I think I'm -- so if a  
11 prisoner is getting a surgical procedure that is done  
12 somewhere else and that's -- you are referring to that  
13 as outpatient?

14 MR. DUCK: Yeah. And I'm not using any,  
15 like, terms of art or trying to -- I'm not relying on  
16 any phrases I'm using to somehow muddy the waters or  
17 not provide anything.

18 MR. LaFATA: Sure. Yeah. I certainly  
19 didn't think you were doing that. I just wanted to  
20 make sure I understand what you are saying. So thank  
21 you for clarifying.

22 You covered addiction treatment. Okay.  
23 You then mentioned the workers' compensation, you said  
24 that the documents would have to be subpoenaed to be  
25 accessed. Did I hear you correctly that the Attorney

1 General would not have a way of accessing the documents  
2 outside of a subpoena?

3 MR. DUCK: That's right. That's my  
4 understanding. So yeah, CompSource is limited -- the  
5 way -- what CompSource is, I mean, you can look it up  
6 online, they are essentially a private workers'  
7 compensation insurance provider. You know, any  
8 business can insure through -- workers through  
9 CompSource. So, you know, it may be that if a certain  
10 agency happens to have its workers' compensation  
11 insurance with CompSource and in that situation, you  
12 know, the -- that agency may have access to things, the  
13 Attorney General's office does not.

14 MR. LaFATA: You mentioned a Workers'  
15 Compensation Commission for resolving disputes about --  
16 and I -- it sounds like that might be disputes of how  
17 CompSource may have done what they did. Who -- what  
18 entity or agency is the -- the commission under?

19 MR. DUCK: It's its own. It's its own  
20 entity. But it is -- it is a state agency. So, I  
21 mean, I think -- we'll verify that real quick. I mean,  
22 it might be part -- technically part of like the State  
23 Department of Health or something, but we'll look it  
24 up. But it's within -- within the state. So to the  
25 extent I said last time that the state does not

1 represent any workers' compensation related entity, I'm  
2 correcting that now. We do not represent or have  
3 control over the documents within CompSource. We do  
4 represent the Workers' Compensation Commission. And  
5 those are two separate entities.

6 MR. LaFATA: I also heard you say there is  
7 a third party that han -- I thought I thought I heard  
8 you say a third party that handles some of this. Was  
9 that just referring to CompSource, or was that the  
10 Workers' Compensation Commission or someone else?

11 MR. DUCK: That was CompSource. Yeah, I  
12 mean, they're -- they're a third party for all  
13 practical -- I mean, for all practical purposes.

14 MR. LaFATA: Okay. I think that covers the  
15 information on my list. I appreciate that. I think  
16 that covers it for what we had to discuss during this  
17 call. Is there anything else?

18 MR. BURNS: Paul, this is Josh Burns. I  
19 had one other thing that was marked on my list from the  
20 last call and this item may have been closed out but I  
21 just wanted to confirm. I think on the response to  
22 Interrogatory Number 2 on Purdue Pharma's  
23 interrogatory, this is the one that deals with  
24 identification of current and former employees,  
25 contractors, et cetera, responsible for, involved in or

1 knowledgeable regarding the payment or reimbursement of  
2 opioid prescriptions. One item that I had footnoted on  
3 this was that whether those -- I think the response to  
4 that was to say that the state would produce certain  
5 organizational charts and other documents and there was  
6 a question that arose on the last call about whether  
7 that would ID -- whether those organizational charts  
8 would identify both employees and contractors, and I  
9 don't recall if we got to the bottom of that issue  
10 during the last call so I just wanted to follow up on  
11 that point.

12 MR. DUCK: So I think the answer to the --  
13 we have an answer to that; it's just the question's  
14 not -- it's not your fault at all. It's just that the  
15 question's not spot on. So let me kind of give you the  
16 response. To the extent that the organizational charts  
17 don't contain contractors - and our sense is that they  
18 won't - we're still going to provide you all the  
19 information related to contractors. So I think that  
20 answers your question, or it's just maybe a slightly  
21 different question. Yeah, I mean, if we've got it,  
22 we're going to produce it.

23 MR. BURNS: Okay.

24 MR. LaFATA: This is Paul. Does that cover  
25 it then?

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MR. BURNS: I believe so, Paul, unless you have any follow up on that. I just wanted to close that one out.

MR. LaFATA: Thank you. All right. Trey and Drew and folks, thank you very much. We will speak soon.

MR. DUCK: All right. Thanks everyone.

MR. LaFATA: All right. Bye.

-END OF TELEPHONE CONFERENCE-

1 STATE OF TEXAS )  
2 COUNTY OF TRAVIS )

3

I, JOSEPH D. HENDRICK, CSR No. 947, do hereby  
4 certify that there came before me on April 10, 2018, at  
5 3:05 o'clock P.m., in the offices of Nix Patterson &  
6 Roach, 3600 North Capital of Texas Highway, Suite 350B,  
7 Austin, Texas, the foregoing proceedings, said  
8 proceedings transcribed by computer-assisted  
9 transcription by me or under my supervision, and that  
10 the transcript is a true record of the proceedings had.  
I further certify that I am neither attorney nor  
11 counsel for, nor related to or employed by, any of  
12 the parties to the action in which these proceedings  
13 were had and, further, that I am not a relative or  
14 employee of any attorney or counsel employed by the  
15 parties hereto, or financially interested in the  
16 action.

17 IN WITNESS WHEREOF I have hereunto set my  
18 hand and affixed my seal on this 16th day of April  
19 2018.

20

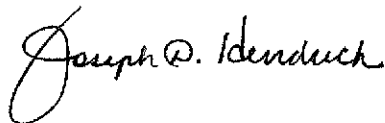
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Joseph D. Hendrick, CSR No. 947

Expiration Date: 12/31/2018



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[specifics - turn]

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[two - york]

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Oklahoma  
Rule 12-3230  
Depositions Upon Oral Examination

F. Review By Witness; Changes; Signing.

The deponent shall have the opportunity to review the transcript of the deposition unless such examination and reading are waived by the deponent and by the parties. After being notified by the officer that the transcript is available, the deponent shall have thirty (30) days in which to review it and, if there are changes in form or substance, to sign a statement reciting such changes and the reasons given by the deponent for making them. The officer shall indicate in the certificate prescribed by paragraph 1 of subsection G of this section whether any review was requested and, if so, shall append any changes made by the deponent during the period allowed.

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