



IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

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

Plaintiff,

v.

PURDUE PHARMA L.P.; PURDUE
PHARMA, INC.; THE PURDUE
FREDERICK COMPANY; TEVA
PHARMACEUTICALS USA, INC.;
CEPHALON, INC.; JOHNSON &
JOHNSON; JANSSEN
PHARMACEUTICALS, INC.; ORTHO-
McNEIL-JANSSEN
PHARMACEUTICALS, INC., n/k/a
JANSSEN PHARMACEUTICALS, INC.;
JANSSEN PHARMACEUTICA, INC.,
n/k/a JANSSEN PHARMACEUTICALS,
INC.; ALLERGAN, PLC, f/k/a ACTAVIS
PLC, f/k/a ACTAVIS, INC., f/k/a
WATSON PHARMACEUTICALS, INC.;
WATSON LABORATORIES, INC.;
ACTAVIS LLC; and ACTAVIS PHARMA,
INC., f/k/a WATSON PHARMA, INC.,

Defendants.

Case No. CJ-2017-816

Honorable Thad Balkman

Special Discovery Master:
William C. Hetherington, Jr.

STATE OF OKLAHOMA } S.S.
CLEVELAND COUNTY }

FILED

AUG 23 2018

In the office of the
Court Clerk MARILYN WILLIAMS

**PURDUE'S RESPONSES AND OBJECTIONS TO PLAINTIFFS'
NOTICE OF DEPOSITION**

To: **Corporate Representative
State of Oklahoma**

Via E-Mail

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Purdue hereby responds and objects to the following deposition topic that the State noticed on August 8, 2018:

The Purdue Defendants' past and present ownership structure; financial status and financial health, including but not limited to information contained in any pro forma financial statements, such as gross revenue, liabilities, profits, and cash flow, for the past five years; distributions of any revenue and/or profits to owners in the past five years; and past and present formal and informal policies and procedures related to the distribution of any revenue and/or profits to owners.

This deposition topic does not comport with the ruling of the Special Discovery Master in the May 23, 2018 order.¹ Pursuant to that order, Purdue will designate a witness under 12 O.S. §3230(C)(5) to testify on the ownership structure for Purdue entities from and including 1996 onward, as well as documents produced to the State on June 8, 2018 (Bates numbered

¹ Judge Hetherington ruled, in relevant part:

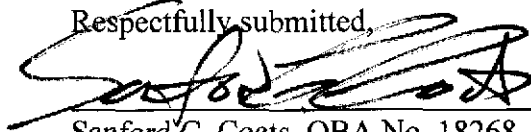
"Purdue's motion to quash is overruled and a protective order is entered only to the extent that allows Purdue to first provide to State the financial information requested from and including 1996 forward and the ownership structure for Purdue entities from and including 1996 forward. It is ordered that this document production be provided to State no later than 4 pm on June 8, 2018. Following that, Purdue shall designate a witness or witnesses to testify thereto with depositions to be completed no later than June 29th, 2018."

Orders of Special Discovery Master on May 17, 2018 Motion Requests, May 23, 2018, Hetherington, W. at pp.4-5.

POK003284950-POK003285828). Purdue's witness is available for deposition on September 20, 26, or 27, 2018.

DATED: August 22, 2018.

Respectfully submitted,



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*Counsel for Purdue Pharma L.P.,
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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of August 2018, I caused a true and correct copy of the following:

**PURDUE'S RESPONSES AND OBJECTION'S TO PLAINTIFFS'
NOTICE OF DEPOSITION**

to be served via email upon the counsel of record listed on the attached Service List.


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