



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;)
(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
Judge Thad Balkman

Special Master:
William Hetherington

STATE OF OKLAHOMA } S.S.
CLEVELAND COUNTY }
FILED
AUG 31 2018

In the office of the
Court Clerk MARILYN WILLIAMS

PLAINTIFF'S MOTION FOR PROTECTIVE ORDER

The Oklahoma Abatement Deposition

On April 20, 2018, Purdue served a deposition notice on the State requesting the State to present a witness on May 31, 2018 to testify regarding:

All Actions You have taken, as well as actions that You considered but did not take during the relevant time period to address, counter, abate, and/or reverse what You allege in Your Complaint to be the opioid epidemic, including the staffing and resources that You spent doing so, any steps You have taken to educate physicians and other healthcare providers

and facilities about opioid medications, any treatment programs for opioid addiction, and any regulatory and law enforcement steps to detect and prevent the misuse of opioid medications (both legal and illicit opioids, including heroin and fentanyl).

(the “Oklahoma Abatement” deposition). Importantly, the State *never objected* to the deposition nor moved to quash the deposition notice. Instead, the State diligently worked with Purdue to agree to a date for the deposition that accommodated the Parties’, their counsel and the State’s witness’ schedules. Because the State’s witness was not available on the noticed date, on May 3rd, Plaintiff’s counsel proposed June 7th as an alternative date for the deposition. *See* Ex. 1. *Three weeks later*, on May 25th, Purdue’s counsel respectfully requested the State present a witness on June 14th instead of June 7th due to “travel and availability.” Ex. 2. As the State’s witness was unavailable on June 14th, on May 29th, Plaintiff’s counsel telephoned Purdue’s counsel to discuss alternative dates for the deposition. Ex. 3. On May 30th, Purdue’s counsel requested Plaintiff provide alternative dates for the deposition. Ex. 4. *That same day*, Plaintiff responded **offering ten alternative dates** for the deposition in June and July. Ex. 5. Purdue never responded and made no further effort to select an alternative date for the deposition. Instead, on June 13th, Purdue improperly removed the case to the United States District Court for the Western District of Oklahoma.

On August 9, 2018, six days after Remand, Purdue re-noticed the Oklahoma Abatement deposition for September 12, 2018. Because of the delay caused by Purdue’s improper removal, the witness the State intended to present to testify on this topic in June or July was no longer available to do so. The State’s witness who is now going to testify on this topic is not available to sit for the deposition on September 12th but is available to do so on September 27th. Not only is the witness unavailable on September 12th, but that date also presents a conflict for Plaintiff’s counsel. As Purdue is aware, the Settlement Master scheduled a two-day settlement meeting on

September 13th and 14th in New York, New York. As such, Plaintiff's counsel will be traveling to New York on September 12th to attend the settlement meeting.

Due to these scheduling conflicts, on August 28, 2018, Plaintiff's counsel informed Purdue's counsel of the witness' unavailability on September 12th and respectfully requested Purdue agree to an alternative date for the deposition, September 27th. That same day, Purdue's counsel fired off a retaliatory response—Purdue would *only* agree to reschedule the Oklahoma Abatement deposition *if* Plaintiff agreed to excuse Purdue from compliance with the Court's August 10th and 24th Orders ordering Purdue to produce a witness for a deposition regarding Purdue's past and present ownership structure and financial health. Ex. 6. Also that same day, Purdue emailed a similar retaliatory response to another of Plaintiff's counsel, who respectfully requested Purdue push back the deposition noticed for September 5th *just one or two days* to accommodate the State's witnesses' schedule:

I'm writing to follow-up on the call yesterday. It is probably not a surprise that, being guided by the State's conduct when Purdue witnesses had genuine scheduling issues – going so far as to seek sanctions -- that Purdue is not presently agreeable to reschedule the 9/5 deposition.

Ex. 7.¹ The State, of course, did not acquiesce to Purdue's ultimatum. *See id.*

The September 19th and 20th Depositions

On August 9, 2018, Purdue served depositions on the State regarding the following topics:

- (1) The standards, practices, and procedures during the Relevant Time Period for the use of opioid medications and opioid alternative medications for persons in the care and custody of State healthcare facilities, including hospitals, teaching

¹ The deposition Purdue noticed for September 5th seeks testimony regarding: "The standards, practices, and procedures during the Relevant Time Period for the diagnosis and treatment of pain and for the use of opioid medications and opioid alternative medications for persons in the care and custody of the Oklahoma Department of Corrections." It was evident from a follow-up email sent by Purdue's counsel on August 29th, that at the time of Plaintiff's request to move the deposition back just one or two days, Purdue had not yet booked travel or accommodations for the deposition. *See* Ex. 8.

hospitals, psychiatric facilities, university hospitals, medical schools, nursing schools, pharmacy schools, clinics and emergency rooms; and

(2) The standards, practices, and procedures during the Relevant Time Period for the diagnosis and treatment of pain that have been taught and applied in State healthcare facilities, including hospitals, teaching hospitals, psychiatric facilities, university hospitals, medical schools, nursing schools, pharmacy schools, clinics, and emergency rooms.

These depositions implicate at least six different types of healthcare facilities in the State and thus each deposition will require several witnesses to testify. As the parties discussed during their June 11, 2018 meet and confer regarding these depositions—prior to removal—the State will identify the appropriate knowledgeable witnesses to testify on these topics and advise Purdue on the number of witnesses it intends to present. Due to the breadth of the topic and number of healthcare facilities potentially implicated, the State requires additional time to identify and prepare the appropriate witnesses for these depositions. Given Purdue’s responses to Plaintiff’s counsels’ recent requests for alternative dates to depositions, the State does not believe Purdue will work with the State to reschedule these depositions either. Thus, the State is filing this motion as a precautionary measure. Should Purdue agree to work with the State in rescheduling these depositions, the relief sought herein will not be necessary.

In sum, Plaintiff respectfully requests the Court grant Plaintiff’s Motion for Protective Order and (1) excuse the State from presenting a witness on the Oklahoma Abatement deposition on September 12th and order the deposition to occur on September 27th or a later date that accommodates the State’s, Purdue’s, their counsel and the State’s witness’ schedule; and (2) excuse the State from presenting witnesses on the September 19th and 20th noticed depositions and order the parties to work together to reach an agreement on alternative dates that accommodate the State’s, Purdue’s, their counsel’s and the witnesses’ schedules.

Dated: August 31, 2018



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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above and foregoing was emailed on August 31, 2018 to:

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Michael Burrage

Cynthia Norman

From: Drew Pate <dpate@nixlaw.com>
Sent: Thursday, May 3, 2018 10:19 PM
To: sandy.coats@crowedunlevy.com
Cc: Brad Beckworth; Trey Duck; Michael Burrage; Reggie Whitten; Lisa Baldwin; Paul LaFata
Subject: Deposition Scheduling
Attachments: 2018-04-20 Notice to Take Videotaped Deposition Purdue scheduled May102018.PDF

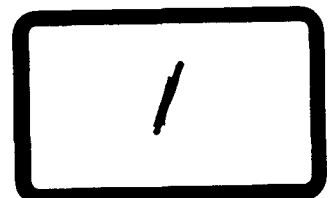
Sandy,

Regarding the attached deposition notice you served, the witness is available on June 7. Please advise if this date works.

Best regards,

Drew

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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,

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.

**NOTICE TO TAKE VIDEOTAPED DEPOSITION OF
CORPORATE REPRESENTATIVE PURSUANT TO
SECTION 3230(C)(5) OF THE DISCOVERY CODE**

To: **Corporate Representative
State of Oklahoma**

Via Email

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Via Email

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Via Email

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Please take notice that, pursuant to OKLA. STAT. TIT. 12 § 3230(C), Defendants Purdue Pharma L.P., Purdue Pharma, Inc., and the Purdue Frederick Company (collectively, “Purdue”) will take the deposition upon oral examination of one or more corporate representative(s) of Plaintiff the State of Oklahoma (the “State”) on the matters described on **Exhibit A** on **May 31, 2018, starting at 9:00 AM**, at the offices of Crowe & Dunlevy, P.C., 324 N. Robinson Avenue, Suite 100, Oklahoma City, Oklahoma 73102.

This deposition is to be used as evidence in the trial of the above action, and the deposition will be taken before an officer authorized by law to administer oaths. It will be recorded by stenographic means and will be videotaped, and it will continue from day to day until completed.

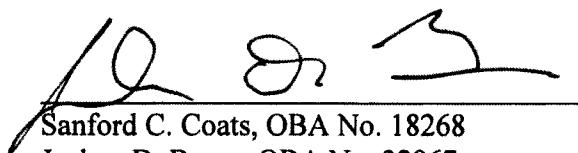
Pursuant to OKLA. STAT. TIT. 12, § 3230(C)(5), the State is hereby notified of its obligation to designate one or more officers, directors, managing agents, or other persons who consent to testify on the State’s behalf about all matters embraced in the “Description of Matters on Which Examination is Requested” that is attached as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that each such officer, director, managing agent, or other person produced by the State to testify under OKLA. STAT. TIT. 12, § 3230(C)(5) has an affirmative duty to have first reviewed all documents, reports, and other matters known or reasonably available to the State, along with speaking to all potential witnesses known or

reasonably available to the State, in order to provide informed and binding answers at the deposition.

DATED: April 20, 2018.

Respectfully submitted,



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*Counsel for Purdue Pharma L.P.,
Purdue Pharma Inc., and The Purdue
Frederick Company Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of April 2018, I caused a true and correct copy of the following:

NOTICE TO TAKE VIDEOTAPED DEPOSITION OF CORPORATE REPRESENTATIVE PURSUANT TO SECTION 3230(C)(5) OF THE DISCOVERY CODE

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

A handwritten signature in black ink, consisting of stylized cursive letters, is written above a horizontal line.

SERVICE LIST

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EXHIBIT A

DESCRIPTION OF MATTERS ON WHICH EXAMINATION IS REQUESTED

1. All actions You have taken, as well as all actions that You considered but did not take, during the relevant time period to address, counter, abate, and/or reverse what You allege in Your Complaint to be the opioid epidemic, including the staffing and resources that You spent doing so, any steps You have taken to educate physicians and other healthcare providers and facilities about opioid medications, any treatment programs for opioid addiction, and any regulatory and law enforcement steps to detect and prevent the misuse of opioid medications (both legal and illicit opioids, including heroin and fentanyl).

Cynthia Norman

From: Sanford C. Coats <sandy.coats@crowedunlevy.com>
Sent: Friday, May 25, 2018 11:00 AM
To: Abby Dillsaver; Bradley E. Beckworth; Ethan A. Shaner; Glenn Coffee; Jeffrey J. Angelovich; Michael Burrage; Reggie Whitten
Cc: Cullen D. Sweeney; Hayden A. Coleman; Jonathan Tam; Joshua Burns; Mark S. Cheffo; Paul LaFata; Sanford C. Coats; Sheila L. Birnbaum
Subject: Depositions in State of Oklahoma v. Purdue et al.

Counsel for the State of Oklahoma,

Earlier this week, the State issued an amended deposition notice of Purdue on the topic of the newspaper open letter for June 15. We appreciate your professional courtesy in scheduling that deposition. In addition to that topic, we can also make the Purdue designee available on June 15 on the topic of actions previously taken for abatement (as issued in the May 4 notice). These topics are related to each other and can thus be addressed together. This will enable the parties to avoid scheduling issues by holding the depositions within the designee's schedule, which as I previously wrote to you does not open up until dates I sent and which the State accepted for June 15. Unless we hear otherwise, we will plan to see you on June 15 for the depositions on these two topics.

Furthermore, we discussed earlier this week the deposition of a State designated witness on the issue of what the state has done to abate the opioid epidemic as alleged in your Petition. You put forward June 7 for that deposition. Due to travel and availability, we respectfully request that that deposition take place on June 14, the day before your depositions of the Purdue corporate deposition. Please let us know whether your witness is available on June 14.

Thank you for your consideration and I hope you all have an enjoyable and meaningful Memorial Day.

Sandy



Sanford C. Coats
Attorney at Law

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This message may be protected by the attorney-client privilege and/or other privileges or protections. If you believe that it has been sent to you in error, do not read it. Please reply to the sender that you have received the message in error and then delete it. Thank you.

Cynthia Norman

From: Reggie Whitten <rwhitten@whittenburrage.com>
Sent: Tuesday, May 29, 2018 10:40 AM
To: Sanford C. Coats
Cc: Lisa Baldwin; Cynthia Norman
Subject: Hey Sandy

We left you a voicemail today. Hope you had a nice Holiday.

Was calling about the depo you wanted. We can't do it on the Noticed date, but want to give you alternative dates.

Call when you can, Reggie

405-519-9689 cell

Sent from my iPad

3

Cynthia Norman

From: Sanford C. Coats <sandy.coats@crowedunlevy.com>
Sent: Wednesday, May 30, 2018 10:34 AM
To: Reggie Whitten; Lisa Baldwin
Cc: Paul LaFata; Joshua Burns
Subject: deposition scheduling
Attachments: 2018-04-20 Notice to Take Videotaped Deposition Purdue scheduled May102018.PDF

Reggie and Lisa,

Thank you for the call yesterday. First, we have gone back and forth with regard to the noticed deposition attached. We originally noticed the deposition for May 31. You subsequently told us that May 31 was not a good date for you. You proposed June 7 which was not available for Purdue, and we suggested June 14. Yesterday we discussed that June 14 is not a good date for you and your witness and that you could provide alternative dates. Please do so and I will let you know which (if any) are acceptable.

Second, we have agreed, and you sent new notices thereon, to produce a Purdue witness on Friday, June 15 on the issues of the New York Times article and abatement efforts. Those notices were for 8:00am at your offices in Oklahoma City. Since it will be a Purdue witness, would you be amenable to conducting those two corporate representative depositions at 8:00am on June 15 at the offices of Crowe & Dunlevy?

Thanks

Sandy



Sanford C. Coats
Attorney at Law

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This message may be protected by the attorney-client privilege and/or other privileges or protections. If you believe that it has been sent to you in error, do not read it. Please reply to the sender that you have received the message in error and then delete it. Thank you.

4

Cynthia Norman

From: Reggie Whitten <rwhitten@whittenburrigelaw.com>
Sent: Wednesday, May 30, 2018 5:09 PM
Cc: Lisa Baldwin; Paul LaFata; Joshua Burns; Michael Burrage; bbeckworth@nixlaw.com
Subject: Re: deposition scheduling

Sandy, I tried you back. Let's talk about this when convenient.

I certainly don't want to get into a war of words, we feel like the defense has been the one stalling and not cooperating. But, we did quickly (on May 3rd) propose June 7 as an alternative date.

The important thing is, can we get this set at a mutually convenient and agreeable time and place?

We can produce a witness on June 19, 21, 26, 27, or July 10, 11, 12, 17 or 19.

I propose we do it June 27th because that is the day before one of the hearings and y'all will all be here anyway, but you are free to select any of these dates.

Please let me know if any of those work.

If you prefer your office for the June 15 depositions, that's fine.

Thanks, Reggie

Sent from my iPad

On May 30, 2018, at 10:34 AM, Sanford C. Coats <sandy.coats@crowedunlevy.com> wrote:

Reggie and Lisa,

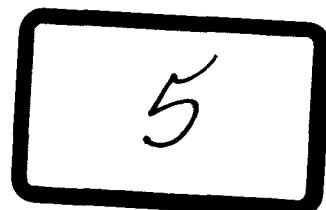
Thank you for the call yesterday. First, we have gone back and forth with regard to the noticed deposition attached. We originally noticed the deposition for May 31. You subsequently told us that May 31 was not a good date for you. You proposed June 7 which was not available for Purdue, and we suggested June 14. Yesterday we discussed that June 14 is not a good date for you and your witness and that you could provide alternative dates. Please do so and I will let you know which (if any) are acceptable.

Second, we have agreed, and you sent new notices thereon, to produce a Purdue witness on Friday, June 15 on the issues of the New York Times article and abatement efforts. Those notices were for 8:00am at your offices in Oklahoma City. Since it will be a Purdue witness, would you be amenable to conducting those two corporate representative depositions at 8:00am on June 15 at the offices of Crowe & Dunlevy?

Thanks

Sandy

<image001.png> **Sanford C. Coats**
Attorney at Law
Braniff Building



324 N. Robinson Ave., Ste. 100
Oklahoma City, OK 73102

direct line: 405.235.7790
direct fax: 405.272.5269
sandy.coats@crowedunlevy.com
[v-card](#) · [bio](#) · [website](#)

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<2018-04-20 Notice to Take Videotaped Deposition Purdue scheduled May102018.PDF>

Cynthia Norman

From: LaFata, Paul <Paul.LaFata@dechert.com>
Sent: Tuesday, August 28, 2018 2:40 PM
To: 'Lisa Baldwin'
Cc: Sanford C. Coats; Reggie Whitten; Brad Beckworth; Michael Burrage; Birnbaum, Sheila
Subject: RE: Deposition scheduling

Lisa,

Our request for mutual courtesy is gender neutral, and your effort to read anything else into it is not accurate.

Your request is denied.

Paul

Paul LaFata
Counsel

Dechert LLP
Three Bryant Park
New York, New York 10036
+1 212-698-3539 Tel
Paul.LaFata@dechert.com
dechert.com

From: Lisa Baldwin [mailto:lbaldwin@nixlaw.com]
Sent: Tuesday, August 28, 2018 1:59 PM
To: LaFata, Paul <Paul.LaFata@dechert.com>
Cc: Sanford C. Coats <sandy.coats@crowedunlevy.com>; rwhitten@whittenburrage.com; Brad Beckworth <bbeckworth@nixlaw.com>; mburrage@whittenburrage.com; Birnbaum, Sheila <Sheila.Birnbaum@dechert.com>
Subject: FW: Deposition scheduling

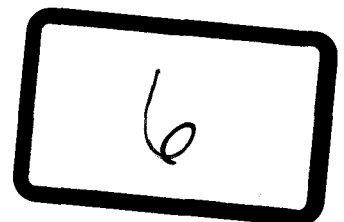
Paul,

Paul, given that it's 2018, I am surprised and disappointed that you would refuse to respond to an email from a woman, and instead, choose to only deal privately with a man. Then, to add insult to injury, you add yet another man to the email, in case the first man is unavailable to respond.

Your request to yet again avoid the deposition ordered by the Court is denied.

Lisa

Lisa P. Baldwin
Nix, Patterson & Roach, LLP
3600 N. Capital of Texas Highway
Building B, Suite 350
Austin, Texas 78746
T: 512.328.5333



F: 512.328.5335

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From: Reggie Whitten <rwhitten@whittenburrigelaw.com>

Date: Tuesday, August 28, 2018 at 12:11 PM

To: Lisa Baldwin <lbaldwin@nixlaw.com>, Brad Beckworth <bbeckworth@nixlaw.com>, Mike Burrage <mburrage@whittenburrigelaw.com>, Trey Duck <tduck@nixlaw.com>, Drew Pate <dpate@nixlaw.com>, Cynthia Norman <cnorman@whittenburrigelaw.com>

Subject: Fwd: Deposition scheduling

Sent from my iPhone

Begin forwarded message:

From: "LaFata, Paul" <Paul.LaFata@dechert.com>

Date: August 28, 2018 at 12:07:15 PM CDT

To: "rwhitten@whittenburrigelaw.com" <rwhitten@whittenburrigelaw.com>

Subject: Fwd: Deposition scheduling

Hi Reggie — I called your main number and left a message on the firm main vm to discuss this request. We would normally entertain courtesy requests, but that has to be a two way street. I'm pulling a witness away from his family on their family vacation for the Thursday dep. I'd entertain the request below if the state agreed today to withdraw the Thursday notice and renote the dep to one of the dates that were offered for him (they were offered in the response and objection to the notice topic). My cell is 760-458-8657

Paul LaFata
Counsel

Dechert LLP
Three Bryant Park
New York, New York 10036
+1 212-698-3500
Paul.LaFata@dechert.com
dechert.com

Begin forwarded message:

From: Lisa Baldwin <lbaldwin@nixlaw.com>

Date: August 28, 2018 at 10:27:40 AM EDT

To: "Sanford C. Coats" <sandy.coats@crowedunlevy.com>

Cc: "LaFata, Paul" <paul.lafata@dechert.com>, Reggie Whitten <reggiwhitten@icloud.com>, Brad Beckworth <bbeckworth@nixlaw.com>

Subject: Deposition scheduling

Sandy,

I'm writing regarding the witness' availability to sit for the attached deposition Purdue noticed on August 9, 2018. The witness is not available on the noticed date, September 12, 2018. We propose September 27th as an alternative date for the deposition. Please let me know if Purdue is agreeable.

Thank you,

Lisa

Lisa P. Baldwin
Nix, Patterson & Roach, LLP
3600 N. Capital of Texas Highway
Building B, Suite 350
Austin, Texas 78746
T: 512.328.5333
F: 512.328.5335

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Cynthia Norman

From: Brad Beckworth <bbeckworth@nixlaw.com>
Date: Friday, August 31, 2018 at 6:36 AM
To: Lisa Baldwin <lbaldwin@nixlaw.com>
Subject: Fwd: Deposition scheduling

Bradley E. Beckworth
Partner
Nix, Patterson & Roach, L.L.P.
bbeckworth@nixlaw.com (e-mail)

Austin Address (Primary):

3600 North Capitol of Texas Highway, Suite 350B
Austin, Texas 78746
512-328-5333

Daingerfield Address:

205 Linda Drive
Daingerfield, Texas 75638
903-645-7128
903-645-4415 (fax)
bbeckworth@nixlaw.com (e-mail)

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Begin forwarded message:

From: "LaFata, Paul" <Paul.LaFata@dechert.com>
Date: August 28, 2018 at 12:49:33 PM CDT
To: "bbeckworth@nixlaw.com" <bbeckworth@nixlaw.com>, "rwhitten@whittenburrage.com" <rwhitten@whittenburrage.com>
Cc: "sandy.coats@crowedunlevy.com" <sandy.coats@crowedunlevy.com>
Subject: Fwd: Deposition scheduling

Adding Brad in case Reggie is out

Paul LaFata
Counsel

Dechert LLP
Three Bryant Park
New York, New York 10036
+1 212-698-3500
Paul.LaFata@dechert.com
dechert.com

Begin forwarded message:

From: "LaFata, Paul" <Paul.LaFata@dechert.com>
Date: August 28, 2018 at 1:07:15 PM EDT
To: "rwhitten@whittenburrage.com" <rwhitten@whittenburrage.com>
Subject: **Fwd: Deposition scheduling**

Hi Reggie — I called your main number and left a message on the firm main vm to discuss this request. We would normally entertain courtesy requests, but that has to be a two way street. I'm pulling a witness away from his family on their family vacation for the Thursday dep. I'd entertain the request below if the state agreed today to withdraw the Thursday notice and renote the dep to one of the dates that were offered for him (they were offered in the response and objection to the notice topic). My cell is 760-458-8657

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Counsel

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Paul.LaFata@dechert.com
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From: Lisa Baldwin <lbaldwin@nixlaw.com>
Date: August 28, 2018 at 10:27:40 AM EDT
To: "Sanford C. Coats" <sandy.coats@crowedunlevy.com>
Cc: "LaFata, Paul" <paul.lafata@dechert.com>, Reggie Whitten <reggiwhitten@icloud.com>, Brad Beckworth <bbeckworth@nixlaw.com>
Subject: **Deposition scheduling**

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September 27th as an alternative date for the deposition. Please let me know if Purdue is agreeable.

Thank you,

Lisa

Lisa P. Baldwin
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Cynthia Norman

From: LaFata, Paul <Paul.LaFata@dechert.com>
Sent: Tuesday, August 28, 2018 9:39 AM
To: 'rossl@nixlaw.com'
Subject: Dep

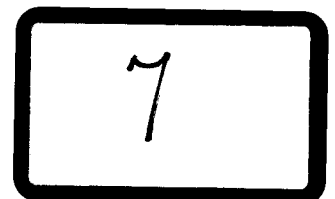
Ross,

I'm writing to follow-up on the call yesterday. It is probably not a surprise that, being guided by the State's conduct when Purdue witnesses had genuine scheduling issues – going so far as to seek sanctions -- that Purdue is not presently agreeable to reschedule the 9/5 deposition.

Paul LaFata
Counsel

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New York, New York 10036
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Paul.LaFata@dechert.com
dechert.com

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Cynthia Norman

From: LaFata, Paul <Paul.LaFata@dechert.com>
Sent: Wednesday, August 29, 2018 10:53 PM
To: rossl@nixlaw.com
Subject: Re: Dep

Good morning ,

Per the below, travel and logistical arrangements have been booked.

Thank you ,

Paul

Paul LaFata
Counsel

Dechert LLP
Three Bryant Park
New York, New York 10036
+1 212-698-3500
Paul.LaFata@dechert.com
dechert.com

On Aug 28, 2018, at 9:39 AM, LaFata, Paul <Paul.LaFata@dechert.com> wrote:

Ross,

I'm writing to follow-up on the call yesterday. It is probably not a surprise that, being guided by the State's conduct when Purdue witnesses had genuine scheduling issues – going so far as to seek sanctions -- that Purdue is not presently agreeable to reschedule the 9/5 deposition.

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