



STATE OF OKLAHOMA }  
CLEVELAND COUNTY } S.S.

IN THE DISTRICT COURT OF CLEVELAND COUNTY  
STATE OF OKLAHOMA

FILED

NOV 08 2018

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

Plaintiff, )

v. )

PURDUE PHARMA L.P., *et al.*, )

Defendants. )

In the office of the  
Court Clerk MARILYN WILLIAMS  
Case No. CJ-2017-816

**MOTION TO ASSOCIATE JOHN THOMAS COX III AS COUNSEL**

Defendants Purdue Pharma, L.P., Purdue Pharma, Inc. and The Purdue Frederick Company, Inc. hereby move the Court for an Order permitting out-of-state counsel John Thomas Cox III to practice in the above-styled and numbered cause pursuant to the Rules Creating and Controlling the Oklahoma Bar Association, 5 O.S. Ch. 1, App. 1, Art. II. This motion is supported by the attached "Signed Application" (Exhibit A), "Certificates of Good Standing" (Exhibit B), and the "Certificate of Compliance" from the Oklahoma Bar Association (Exhibit C).

DATED: November 8, 2018.

Respectfully submitted,

SANFORD C. COATS, OBA #18268  
JOSHUA D. BURNS, OBA #32967  
CROWE & DUNLEVY  
A Professional Corporation  
Braniff Building  
324 N. Robinson Ave., Suite 100  
Oklahoma City, Oklahoma 73102  
(405) 235-7700; (405) 239-6651 (Facsimile)  
sandy.coats@crowedunlevy.com  
joshua.burns@crowedunlevy.com

**ATTORNEYS FOR DEFENDANTS PURDUE  
PHARMA, L.P., PURDUE PHARMA, INC.  
AND THE PURDUE FREDERICK  
COMPANY, INC.**

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing was mailed, postage prepaid, this 8 day of November, 2018 to:

Mike Hunter  
Abby Dillsaver  
Ethan A. Shaner  
Attorney General's Office  
313 N.E. 21st Street  
Oklahoma City, Oklahoma 73105

Michael Burrage  
Reggie Whitten  
J. Revell Parrish  
Whitten Burrage  
512 North Broadway Avenue, Suite 300  
Oklahoma City, Oklahoma 73102

Bradley E. Beckworth  
Jeffrey J. Angelovich  
Lloyd "Trey" Nolan Duck, III  
Andrew Pate  
Lisa Baldwin  
Nix, Patterson & Roach, LLP  
512 North Broadway Avenue, Suite 200  
Oklahoma City, Oklahoma 73102

Glenn Coffee  
Glenn Coffee & Associates, PLLC  
915 North Robinson Avenue  
Oklahoma City, Oklahoma 73102

Robert G. McCampbell  
Nicholas V. Merkley  
GableGotwals  
One Leadership Square, 15th Floor  
211 North Robinson  
Oklahoma City, Oklahoma 73102

Benjamin H. Odom  
John H. Sparks  
Michael W. Ridgeway  
David Kinney  
Odom, Sparks & Jones, PLLC  
HiPoint Office Building  
2500 McGee Drive, Suite 140  
Norman, Oklahoma 73072

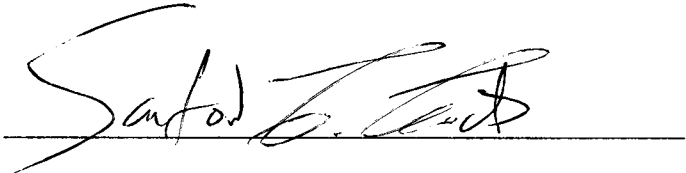
Larry D. Ottaway  
Amy Sherry Fischer  
Foliart, Huff, Ottaway & Bottom  
201 Robert S. Kerr Avenue, 12th Floor  
Oklahoma City, Oklahoma 73102

Steven A. Reed  
Harvey Bartle IV  
Jeremy A. Menkowitz  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921

Brian M. Ercole  
Morgan, Lewis & Bockius LLP  
200 S. Biscayne Blvd., Suite 5300  
Miami, FL 33131

Charles C. Lifland  
Jennifer D. Cardelús  
O'Melveny & Myers, LLP  
400 S. Hope Street  
Los Angeles, CA 90071

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



# APPLICATION APPROVED



## OUT OF STATE ATTORNEY REGISTRATION

John Thomas Cox III, Applicant, respectfully represents:  
First Name Middle Name Last Name

1. Applicant is an attorney at law and a member of the law firm of Lynn Pinker  
Cox & Hurst, LLP ("LPCH")

with its principal offices located at 2100 Ross Avenue, Suite 2700

Dallas, Dallas, TX, 75201  
City County State Zip Code  
(214) 981-3800, (214) 981-3813, (214) 981-3839  
Telephone (Firm) Telephone (Applicant's Direct Dial) Fax (Applicant)

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

please provide the following: \_\_\_\_\_

Mailing Address

\_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_  
City County State Zip Code

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

<u>State</u>	<u>Date of Admission</u>
<u>Texas</u>	<u>November 7, 1997</u>
<u>Georgia</u>	<u>October 30, 1996</u>

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

<u>Tribunal</u>	<u>Date of Admission</u>
<u>See Attachment A</u>	

---

---

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

---

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

---

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

---

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

---

8. Applicant seeks admission to practice in the State of Oklahoma in the following matter (give particulars; e.g. caption of case, court or agency, type of matter, party to be represented): **Note - A separate application is to be submitted for each matter in which the applicant seeks admission!** State of Oklahoma, ex rel., Mike Hunter, Attorney General of Oklahoma v. (1) Purdue Pharma, L.P., (2) Purdue Pharma, Inc., (3) The Purdue Frederick Company, (4) Teva Pharmaceuticals USA, Inc., (5) Cephalon, Inc., (6) Johnson & Johnson, (7) Janssen Pharmaceuticals, Inc., (8) Ortho-McNeil-Janssen Pharmaceuticals, Inc.

n/k/a Janssen Pharmaceuticals, Inc., (9) Janssen Pharmaceutica, Inc., n/k/a Janssen Pharmaceuticals, Inc., (10) Allergan, PLC f/k/a Actavis PLC, f/k/a Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc., (11) Watson Laboratories, Inc., (12) Actavis, LLC, and (13) Actavis Pharma, Inc., f/k/a Watson Pharma, Inc.;  
Case No. CJ-2017-816, in the District Court of Cleveland County, State of Oklahoma; This is a fraud and consumer protection action. LPCH seeks to represent (1) Purdue Pharma, L.P., (2) Purdue Pharma, Inc., and (3) The Purdue Frederick Company.

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

Sanford                      C.                      Coats                      18268  
First Name                      Middle Name                      Last Name                      O.B.A. Number

324 N. Robinson Avenue, Suite 100, Oklahoma City, OK, 73102,  
Mailing Address                      City                      State                      Zip Code

(405) 235-7700, (405) 239-6651, sandy.coats@crowedunlevy.com  
Telephone Number                      Fax Number                      E-mail Address

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

PARTY NAME(S)	COUNSEL NAME(S)	ADDRESS OF COUNSEL
Purdue Pharma L.P. Purdue Pharma Inc. The Purdue Frederick Company Inc.	Sanford C. Coats Joshua D. Burns	324 N. Robinson Avenue, Suite 100 Oklahoma City, OK 73102

<p>Teva Pharmaceuticals USA, Inc.</p> <p>Cephalon, Inc.</p> <p>Watson Laboratories, Inc.</p> <p>Actavis LLC</p> <p>Actavis Pharma, Inc. f/k/a Watson Pharma, Inc.</p>	<p>Robert G. McCampbell Nicholas Merkley</p>	<p>One Leadership Square 15th Floor, 211 North Robinson Oklahoma City, OK 73102-7255</p>
<p>Johnson &amp; Johnson</p> <p>Janssen Pharmaceuticals, Inc.</p> <p>Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc.</p> <p>Janssen Phannaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc.</p>	<p>Benjamin H. Odom John Sparks</p>	<p>HiPoint Office Building 2500 McGee Drive Suite 140 Oklahoma City, OK 73072</p>
<p>Johnson &amp; Johnson</p> <p>Janssen Pharmaceuticals, Inc.</p> <p>Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc.</p> <p>Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc.</p>	<p>Larry D. Ottaway Amy Sherry Fischer</p>	<p>201 Robert S. Kerr Avenue 12<sup>th</sup> Floor Oklahoma City, OK 73102</p>
<p>State of Oklahoma, ex rel., Mike Hunter, Attorney General of Oklahoma</p>	<p>Michael Burrage Reggie Whitten</p>	<p>512 N. Broadway Avenue Suite 300 Oklahoma City, OK 73102</p>
	<p>Mike Hunter Abby Dillsaver Ethan A. Shaner</p>	<p>313 N.E. 21st Street, Oklahoma City, OK 73105</p>
	<p>Bradley E. Beckworth Jeffrey J. Angelovich</p>	<p>512 N. Broadway Avenue Suite 200 Oklahoma City, OK 73102</p>
	<p>Glenn Coffee</p>	<p>915 N. Robinson Avenue Oklahoma City, OK 73102</p>

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

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

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

I, John T. Cox III, do hereby swear/affirm under penalty of perjury that the assertions of this application are true:

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

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

DATED this 1<sup>st</sup> day of November 2018.

  
\_\_\_\_\_  
Applicant

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

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

# ATTACHMENT A TO APPLICATION



OUT OF STATE ATTORNEY REGISTRATION

**JOHN THOMAS COX III**

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

<b>Tribunal</b>	<b>Date of Admission</b>
<u>USDC Northern District of Texas</u>	<u>05/07/1997</u>
<u>USDC Southern District of Texas</u>	<u>01/24/2001</u>
<u>USDC Eastern District of Texas</u>	<u>03/24/2003</u>
<u>USDC Western District of Texas</u>	<u>03/29/2010</u>
<u>US Court of Appeals - 5th Circuit</u>	<u>11/07/1996</u>



# STATE BAR OF TEXAS



*Office of the Chief Disciplinary Counsel*

October 30, 2018

Re: Mr. John T. Cox III, State Bar Number 24003722

To Whom It May Concern:

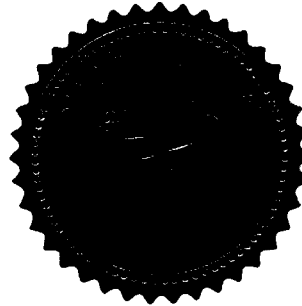
This is to certify that Mr. John T. Cox III was licensed to practice law in Texas on November 07, 1997, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension from the practice of law.

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

Sincerely,

A handwritten signature in black ink, appearing to read "L. Acevedo", written in a cursive style.

Linda A. Acevedo  
Chief Disciplinary Counsel  
LA/web





# State Bar of Georgia

*Lawyers Serving the Public and the Justice System*

**Mr. John Thomas Cox, III**  
**Lynn Pinker Cox & Hurst, LLP**  
**2100 Ross Avenue, Suite 2700**  
**Dallas, TX 75201**

**CURRENT STATUS:** Active Member-Good Standing  
**DATE OF ADMISSION:** 10/30/1996  
**BAR NUMBER:** 192530  
**TODAY'S DATE:** 10/26/2018

The prerequisites for practicing law in the State of Georgia are as follows:

- Certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).
- Sworn in to the Superior Court in Georgia, highest court required to practice law in Georgia.
- Enrolled with the State Bar of Georgia, administrative arm of the Supreme Court of Georgia.

This member is currently in “good standing” as termed and defined by State Bar Rule 1-204. The member is current in license fees and is not suspended or disbarred as of the date of this letter.



## STATE BAR OF GEORGIA

*Brinda Lovvorn*

Official Representative of the State Bar of Georgia

### HEADQUARTERS

104 Marietta St. NW, Suite 100  
Atlanta, GA 30303-2743  
404-527-8700 • 800-334-6865  
Fax 404-527-8717  
[www.gabar.org](http://www.gabar.org)

### COASTAL GEORGIA OFFICE

18 E. Bay St.  
Savannah, GA 31401-1225  
912-239-9910 • 877-239-9910  
Fax 912-239-9970

### SOUTH GEORGIA OFFICE

244 E. 2nd St. (31794)  
P.O. Box 1390  
Tifton, GA 31793-1390  
229-387-0446 • 800-330-0446  
Fax 229-382-7435



## Certificate of Compliance

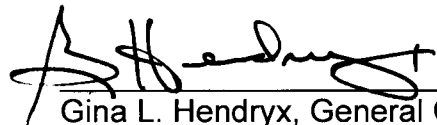
Oklahoma Bar Association  
1901 North Lincoln Boulevard  
Post Office Box 53036  
Oklahoma City, Oklahoma 73152-3036

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

1. Applicant has submitted a signed application of out-of-state attorneys, certificate(s) of good standing, and the non-refundable application fee pursuant to the Rules Creating and Controlling the Oklahoma Bar Association, 5 O.S. Ch. 1, App. 1, Art. II.
2. Date of Application: **November 6, 2018**
3. Application Number: **2018-537**
4. Applying Attorney: **John Thomas Cox, III  
Lynn Pinker Cox & Hurst, LLP  
2100 Ross Avenue, Suite 2700  
Dallas, TX 75201**
5. The Application was: **GRANTED**

Dated this 6th day of October, 2018.



  
Gina L. Hendryx, General Counsel  
Oklahoma Bar Association