



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, 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.,

Defendants.

STATE OF OKLAHOMA }
CLEVELAND COUNTY } S.S.

FILED

NOV 29 2018

In the office of the
Court Clerk MARILYN WILLIAMS

Case No. CJ-2017-816

The Honorable Thad Balkman

MOTION TO ASSOCIATE COUNSEL

Plaintiff, State of Oklahoma ex rel., Mike Hunter, Attorney General of Oklahoma, hereby moves the Court for an Order permitting Robert Winn Cutler 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), "Certificate(s) of Good Standing (Exhibit B), and the "Certificate of Compliance" from the Oklahoma Bar Association (Exhibit C).

DATED: November 2⁹, 2018

Submitted by:



Michael Burrage, OBA No. 1350
Reggie Whitten, OBA No. 9576
J. Revell Parish, OBA No. 30205
WHITTEN BURRAGE
512 N. Broadway Avenue, Suite 300
Oklahoma City, OK 73102
Telephone: (405) 516-7800
Facsimile: (405) 516-7859
Emails: mburrage@whittenburrage.com
rwhitten@whittenburrage.com
rparish@whittenburrage.com

Bradley E. Beckworth, OBA No. 19982
Jeffrey J. Angelovich, OBA No. 19981
Lisa Baldwin, OBA No. 32947
Trey Duck, OBA No. 33347
Drew Pate, *pro hac vice*
Brooke A. Churchman, OBA No. 31946
Nathan B. Hall, OBA No. 32790
NIX, PATTERSON, LLP
512 N. Broadway Avenue, Suite 200
Oklahoma City, OK 73102
Telephone: (405) 516-7800
Facsimile: (405) 516-7859
Emails: nhall@nixlaw.com
bbeckworth@nixlaw.com
jangelovich@nixlaw.com
lbaldwin@nixlaw.com
tduck@nixlaw.com
dpate@nixlaw.com
bchurchman@nixlaw.com

Mike Hunter, OBA No. 4503
ATTORNEY GENERAL FOR
THE STATE OF OKLAHOMA
Abby Dillsaver, OBA No. 20675
GENERAL COUNSEL TO
THE ATTORNEY GENERAL
Ethan A. Shaner, OBA No. 30916
DEPUTY GENERAL COUNSEL
313 N.E. 21st Street
Oklahoma City, OK 73105

Telephone: (405) 521-3921
Facsimile: (405) 521-6246
Emails: abby.dillsaver@oag.ok.gov
ethan.shaner@oag.ok.gov

Glenn Coffee, OBA No. 14563
GLENN COFFEE & ASSOCIATES, PLLC
915 N. Robinson Ave.
Oklahoma City, OK 73102
Telephone: (405) 601-1616
Email: gcoffee@glenncoffee.com

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above and foregoing was emailed on November 28, 2018 to:

9

Sanford C. Coats
Joshua D. Burns
CROWE & DUNLEVY, P.C.
Braniff Building
324 N. Robinson Ave., Ste. 100
Oklahoma City, OK 73102

Sheila Birnbaum
Mark S. Cheffo
Hayden A. Coleman
Paul A. LaFata
Marina L. Schwarz
Lindsay Zanello
Erik Snapp
DECHERT LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036

Jonathan S. Tam
Jae Hong Lee
DECHERT LLP
One Bush Drive, Suite 1600
San Francisco, CA 94104

Benjamin Franklin McAnaney
DECHERT LLP
2929 Arch Street
Philadelphia, PA 19104

Britta Erin Stanton
John D. Volney
John Thomas Cox III
Eric Wolf Pinker
Jervonne Denise Newsome
Jared Daniel Eisenberg
John Thomas Cox III
LYNN PINKER COX & HURST LLP
2100 Ross Avenue, Suite 2700
Dallas, TX 75201

Robert S. Hoff
WIGGIN AND DANA LLP
265 Church Street
New Haven, CT 06510

Benjamin H. Odom
John H. Sparks
Michael W. Ridgeway
David L. Kinney
ODOM, SPARKS & JONES PLLC
HiPoint Office Building
2500 McGee Drive Ste. 140
Norman, OK 73072

Larry D. Ottaway
Amy Sherry Fischer
FOLIART, HUFF, OTTAWAY &
BOTTOM
201 Robert S. Kerr Avenue, 12th Floor
Oklahoma City, OK 73102

Stephen D. Brody
David K. Roberts
O'MELVENY & MYERS LLP
1625 Eye Street NW
Washington, DC 20006

Charles C. Lifland
Jennifer D. Cardelus
Wallace M. Allan
Sabrina H. Strong
Esteban Rodriguez
Houman Ehsan
O'MELVENY & MYERS LLP
400 S. Hope Street
Los Angeles, CA 90071

Jeffrey Barker
O'MELVENY & MYERS LLP
610 Newport Center Drive
Newport Beach, CA 92660

Daniel J. Franklin
Ross Galin
Desirae Krislie Cubero Tongco
O'MELVENY & MYERS LLP
7 Times Square
New York, NY 10036

Amy Riley Lucas
O'MELVENY & MYERS LLP
1999 Avenue of the Stars, 8th Floor
Los Angeles, California 9006

Robert G. McCampbell
Travis J. Jett
Nicholas V. Merkle
Ashley E. Quinn
GABLEGOTWALS
One Leadership Square, 15th Floor

211 North Robinson
Oklahoma City, OK 73102-7255

Brian M. Ercole
MORGAN, LEWIS & BOCKIUS LLP
200 S. Biscayne Blvd., Suite 5300
Miami, FL 33131

Steven A. Reed
Harvey Bartle IV
Jeremy A. Menkowitz
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103-2921

Mark A. Fiore
MORGAN, LEWIS & BOCKIUS LLP
502 Carnegie Center
Princeton, NJ 08540


Michael Burrage

EXHIBIT A

APPLICATION APPROVED



OUT OF STATE ATTORNEY REGISTRATION

Robert Winn Cutler, Applicant, respectfully represents:
First Name Middle Name Last Name

1. Applicant is an attorney at law and a member of the law firm of _____

Nix Patterson, LLP

with its principal offices located at 3600 N Capital of Texas Highway, Suite B350

Austin, Travis, TX, 78746,
City County State Zip Code
(512) 328-5333, (), (512) 328-5335,
Telephone (Firm) Telephone (Applicant's Direct Dial) Fax (Applicant)

winncutler@nixlaw.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>December 14, 2012</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>US District Court, Eastern District of Texas</u>	<u>2013</u>

US District Court, Western District of Texas

8/4/2014

US District Court, Northern District of Texas

2013

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. Purdue Pharma, et al; District

Court of Cleveland County; Case No. CJ-2017-816; False Claims/Public Nuisance/Fraud; Requesting to

represent Plaintiff

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

<u>Michael</u>	<u>Burrage</u>	<u>1350</u>	
First Name	Middle Name	Last Name	O.B.A. Number
<u>512 No. Broadway Ave., Suite 300</u>	<u>Oklahoma City</u>	<u>OK</u>	<u>73102</u>
Mailing Address	City	State	Zip Code
<u>(405) 516-7800</u>	<u>(405) 916-7859</u>	<u>mburrage@whittenburrage.com</u>	
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:

<u>Party Name</u>	<u>Counsel Name</u>	<u>Address of Counsel</u>
-------------------	---------------------	---------------------------

Please see attached sheet

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, Robert Winn Cutler, 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 14th 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

Form 200B

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:

Attorney

Angelovich, Jeffrey J (Bar #19981)
512 N BROADWAY AVE STE 200
OKLAHOMA CITY, OK 73102

Baldwin, Lisa (Bar #32947)
Nix, Patterson & Roach, LLP
512 North Broadway Avenue, Suite 200
Oklahoma City, OK 73102

Beckworth, Bradley E (Bar #19982)
512 N BROADWAY AVE STE 200
OKLAHOMA CITY, OK 73102

Burns, Joshua D (Bar #32967)
CROWE & DUNLEVY P.C.
BRANIFF BUILDING
324 NORTH ROBINSON AVE., STE 100
OKLAHOMA CITY, OK 73102

Burrage, Michael (Bar #1350)
512 N BROADWAY AVE STE 300
OKLAHOMA CITY, OK 73102

Cheffo, Mark Steven
EMANUEL URQUHART & SULLIVAN LLP
51 MADISON AVENUE, 22ND FLOOR
NEW YORK, NY 10010

Churchman, Brooke A (Bar #31946)
NIX PATTERSON LLP
512 N BROADWAY STE 200
okc, OK 73102

Represented Parties

OKLAHOMA STATE OF ex rel ATTORNEY
GENERAL OF OKLAHOMA,

OKLAHOMA STATE OF ex rel ATTORNEY
GENERAL OF OKLAHOMA,

OKLAHOMA STATE OF ex rel ATTORNEY
GENERAL OF OKLAHOMA,

Purdue Pharma L P,
Purdue Pharma Inc,
Purdue Frederick Company,

OKLAHOMA STATE OF ex rel ATTORNEY
GENERAL OF OKLAHOMA,

Purdue Frederick Company,
Purdue Pharma Inc,
Purdue Pharma L P,

OKLAHOMA STATE OF ex rel ATTORNEY
GENERAL OF OKLAHOMA,

Attorney

Coats, Sanford C (Bar #18268)
CROWE & DUNLEVY P.C.
324 NORTH ROBINSON AVE. SUITE 100
BRANIFF BUILDING
OKLAHOMA CITY, OK 73102

Coffee, Glenn (Bar #14563)
915 N ROBINSON AVE
OKLAHOMA CITY, OK 73102

Dillsaver, Abby (Bar #20675)
313 NE 21ST STREET
OKLAHOMA CITY, OK 73105

Duck, Lloyd Nolan Iii (Bar #33347)
512 NORTH BROADWAY AVE STE 200
OKLAHOMA CITY, OK 73102

FISCHER, AMY SHERRY (Bar #16651)
201 ROBERT S. KERR AVENUE, 12th FLOOR
OKLAHOMA CITY, OK 73102

Hunter, Mike (Bar #4503)
313 NE 21ST STREET
OKLAHOMA CITY, OK 73105

Kinney, David L (Bar #10875)
ODOM SPARKS & JONES PLLC
HIPOINT OFFICE BUILDING
2500 MCGEE DRIVE STE 140
NORMAN, OK 73072

MERKLEY, NICHOLAS V (Bar #20284)
GABLEGOTWALS
ONE LEADERSHIP SQUARE 15TH FLOOR
OKLAHOMA CITY, OK 73102

ODOM, BENJAMIN H (Bar #10917)
2500 SOUTH MCGEE DRIVE
SUITE 140
NORMAN, OK 73072

Represented Parties

Purdue Frederick Company,
Purdue Pharma Inc,
Purdue Pharma L P,

OKLAHOMA STATE OF ex rel ATTORNEY
GENERAL OF OKLAHOMA,

OKLAHOMA STATE OF ex rel ATTORNEY
GENERAL OF OKLAHOMA,

OKLAHOMA STATE OF ex rel ATTORNEY
GENERAL OF OKLAHOMA,

Janssen Pharmaceuticals Inc,
Janssen Pharmaceutica Inc,

OKLAHOMA STATE OF ex rel ATTORNEY
GENERAL OF OKLAHOMA,

Ortho McNeil Janssen Pharmaceuticals Inc,
Janssen Pharmaceuticals Inc,
Janssen Pharmaceutica Inc,
Johnson & Johnson,

TEVA Pharmaceuticals USA Inc,
Cephalon Inc,
Watson Laboratories Inc,
Actavis LLC,
Actavis Pharma Inc,

Ortho McNeil Janssen Pharmaceuticals Inc,
Janssen Pharmaceutica Inc,
Janssen Pharmaceuticals Inc,
Johnson & Johnson,

Attorney

OTTAWAY, LARRY D (Bar #6816)
201 ROBERT S. KERR AVE
12TH FLOOR
OKLAHOMA CITY, OK 73102

Parrish, J Revell (Bar #30205)
512 N BROADWAY AVE STE 300
OKLAHOMA CITY, OK 73102

Quinn, Ashley E (Bar #33251)
GableGotwals
One Leadership Square, 15th Floor
211 N Robinson Ave
Oklahoma City, OK 73102

Ridgeway, Michael W (Bar #15657)
2500 MCGEE DR
SUITE 140
ODOM, SPARKS & JONES, PLLC
NORMAN, OK 73072

Schumacher, Tracy (Bar #15950)
SCHUMACHER & STANLEY PLLC
114 E MAIN STREET
NORMAN, OK 73072

Shaner, Ethan A (Bar #30916)
313 NE 21ST STREET
OKLAHOMA CITY, OK 73105

Sweeney, Cullen Dean (Bar #30269)
324 NORTH ROBINSON AVE.
SUITE 100
OKC, OK 73102

Whitten, Reggie (Bar #9576)
512 N BROADWAY AVE STE 300
OKLAHOMA CITY, OK 73102

Represented Parties

Ortho McNeil Janssen Pharmaceuticals Inc,
Johnson & Johnson,

OKLAHOMA STATE OF ex rel ATTORNEY
GENERAL OF OKLAHOMA,

Cephalon Inc,
TEVA Pharmaceuticals USA Inc,
Watson Laboratories Inc,
Actavis LLC,
Actavis Pharma Inc,

Janssen Pharmaceutica Inc,
Ortho McNeil Janssen Pharmaceuticals Inc,
Johnson & Johnson,

OKLAHOMA STATE OF ex rel ATTORNEY
GENERAL OF OKLAHOMA,

OKLAHOMA STATE OF ex rel ATTORNEY
GENERAL OF OKLAHOMA,

Purdue Frederick Company,
Purdue Pharma Inc,
Purdue Pharma L P,

OKLAHOMA STATE OF ex rel ATTORNEY
GENERAL OF OKLAHOMA,

EXHIBIT B

STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

November 14, 2018

Re: Robert Winn Cutler, State Bar Number 24084364

To Whom It May Concern:

This is to certify that Robert Winn Cutler was licensed to practice law in Texas on December 14, 2012, 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", with a stylized, cursive script.

Linda A. Acevedo
Chief Disciplinary Counsel
LA/web



The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

Robert Winn Cutler

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 14th day of December, 2012.

I further certify that the records of this office show that, as of this date

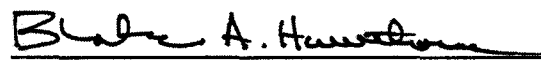
Robert Winn Cutler

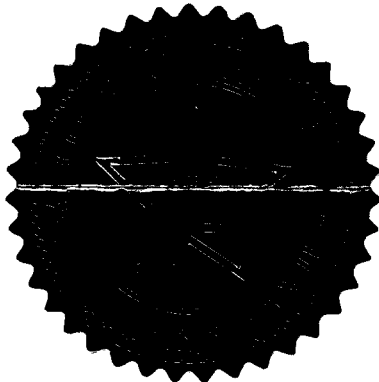
is presently enrolled with the State Bar of Texas as an active member in good standing.

IN TESTIMONY WHEREOF witness my signature

and the seal of the Supreme Court of
Texas at the City of Austin, this, the
14th day of November, 2018.

BLAKE HAWTHORNE, Clerk


Clerk, Supreme Court of Texas



No. 6958C.1

EXHIBIT C



Certificate of Compliance

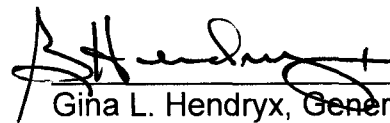
Oklahoma Bar Association
1901 North Lincoln Boulevard
Post Office Box 53036
Oklahoma City, Oklahoma 73152-3036

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 19, 2018**
3. Application Number: **2018-552**
4. Applying Attorney: **Robert Winn Cutler
Nix Patterson, LLP
3600 N. Capital of Texas Highway, Suite B350
Austin, TX 78746**
5. The Application was: **GRANTED**

Dated this 19th day of November, 2018.




Gina L. Hendryx, General Counsel
Oklahoma Bar Association