

## 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 S.S. CLEVELAND COUNTY S.S.

JAN 0.7 2019

In the office of the Court Clerk MARILYN WILLIAMS

Case No. CJ-2017-816

Honorable Thad Balkman

#### MOTION TO ASSOCIATE COUNSEL

Defendants, Teva Pharmaceuticals, USA, Inc., Cephalon, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc., f/k/a Watson Pharma, Inc., hereby move the Court for an Order Permitting Martha A. Leibell 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).

Robert G. McCampbell, OBA No. 10390

Nicholas ("Nick") V. Merkley, OBA No. 20284

Ashley E. Quinn, OBA No. 33251

**GABLEGOTWALS** 

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#### **OF COUNSEL:**

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E-mail: <u>melissa.coates@morganlewis.com</u>
Email: <u>martha.leibell@morganlewis.com</u>

Attorneys for Defendants Cephalon, Inc., Teva Pharmaceuticals USA, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc. f/k/a Watson Pharma, Inc.

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was emailed this 7th day of January, 2019, to the following:

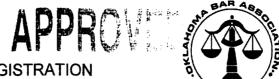
Attorneys for Plaintiff	Mike Hunter, Attorney General Abby Dillsaver, General Counsel Ethan Shaner, Dep. Gen. Counsel ATTORNEY GENERAL'S OFFICE 313 N.E. 21st Street Oklahoma City, OK 73105	Michael Burrage Reggie Whitten J. Revell Parrish WHITTEN BURRAGE 512 N. Broadway Ave., Ste. 300 Oklahoma City, OK 73102
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	Jeffrey J. Angelovich	Lisa Baldwin
	Lloyd N. Duck	Nathan B. Hall
	NIX, PATTERSON & ROACH	NIX PATTERSON & ROACH
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	•	Austin, TX 78746
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	GLENN COFFEE &	Ross E Leonoudakis
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Johnson, Janssen	Michael W. Ridgeway	Wallace M. Allan
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Inc., N/K/A	ODOM SPARKS & JONES	Houman Ehsan
Janssen	2500 McGee Drive, Suite 140	Esteban Rodriguez
Pharmaceuticals,	Norman, OK 73072	O'MELVENY & MEYERS
Inc., and Ortho-		400 S. Hope Street, 18th Floor
McNeil-Janssen		Los Angeles, CA 90071
Pharmaceuticals,	Stephen D. Brody	Daniel J. Franklin
Inc. N/K/A Janssen	David Roberts	Ross B Galin
Pharmaceuticals,	O'MELVENY & MEYERS	Desirae Krislie Cubero Tongco
Inc.	1625 Eye Street NW	O'MELVENY & MEYERS
	Washington, DC 20006	7 Times Square
		New York, NY 10036
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	Lauren S. Rakow	O'MELVENY & MEYERS
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	O'MELVENY & MEYERS	Newport Beach, CA 92660
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	Los Angeles, CA 90067	
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	Oklahoma City, OK 73102	

Attorneys for	Sheila L. Birnbaum	Erik W. Snapp	
Purdue Pharma,	Mark S. Cheffo	DECHERT LLP	
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Inc. and The	Jonathan S. Tam		
Purdue Frederick	Lindsay N. Zanello	Benjamin F. McAnaney	
Company	DECHERT LLP	DECHERT LLP	
- •	Three Bryant Park	2929 Arch Street	
	1095 Avenue of the Americas	Philadelphia, PA 19104	
	New York, NY 10036	_	
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	John D. Volney	WIGGIN & DANA, LLP	
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	Jared D. Eisenberg		
	Jervonne D. Newsome	Sandy Coats	
	LYNN PINKER COX &	Joshua Burns	
	HURST, LLP	CROWE & DUNLEVY	
	2100 Ross Avenue, Suite 2700	324 N. Robinson Ave., Ste. 100	
	Dallas, TX 75201	Oklahoma City, OK 73102	
	Ashley E. Qu	<u>5.</u> <u>0</u>	

# Exhibit A

## **APPLICATION**



## OUT OF STATE ATTORNEY REGISTRATION

<u>Martha</u>	Α.	<u>Leibell</u>	, Applicant, respectfully represents:
First Name	Middle Name	Last Name	
1. Applicant i	is an attorney at	law and a mem	ber of the law firm of
Morgan, Lev	vis & Bockius LL	.P	
with its princi	pal offices locate	ed at <u>200 Sout</u>	th Biscayne Boulevard, Suite 5300,
Miami			e , <u>FL , 33131 , State Zip Code</u>
Cit ( 305 ) 415- Telephone martha.leibel E-mail Address (Ap	3000 (Fim) Il@morganlewis.	( <u>305</u> ) 415-33 Telephone (Applican	State Zip Code  887 , (305 ) 415-3001 ,  t's Direct Dial) Fax (Applicant)  nt's office address is different from
Above please	e provide the foll	lowina:	
Mailing Address		Mailing Address	
Cit		County	State Zip Code
Cit	у	County	State Zip Code
2. Applicant	is admitted to pr	actice and is a	member in good standing (certificates
of good stand	ding attached) of	the bar(s) of the	e highest state court(s) of the following
state(s):			
<u>State</u>			Date of Admission
Florida			10/10/2013
New York			09/2011

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>		
USDC Southern District of Florida	10/2018		
USDC Southern District of New York	10/2013		
USCA for the Second Circuit	10/2013		
United States Supreme Court	05/2015		
Have you ever been suspended or disbarred hereinafter provided (Give particulars; e.g. court No			
5. Are you currently subject to any pending disconganization with authority to discipline attorneys provided (Give particulars; e.g. court, discipline No	s at law except as hereinafter authority, date, status):		
6. Have you ever received public discipline inclusive suspension or disbarment, by any organization vattorneys at law except as hereinafter provided discipline authority, type of discipline, date, state No	with authority to discipline (Give particulars; e.g. court,		
7. Have you ever had any certificate or privilege any regulatory or administrative body suspende hereinafter provided (Give particulars; e.g. admissispension or reinstatement):  No	d or revoked except as nistrative body, date, status of		
8. Applicant seeks admission to practice in the	State of Oklahoma in the following		
matter (give particulars; e.g. caption of case, cou	urt or agency, type of matter, party		
to be represented): Note - A separate applicat	tion is to be submitted for each		
matter in which the applicant seeks admission	on!		
State of Oklahoma v. Purdue Pharma L.P.	et al., Case No. CJ2017-816		
(District Court, Cleveland County)			

. . .

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

Robert	G	McCampbell	10390	)
First Name	Middle Name	Last Name	O.B.A. Numbe	er .
	hip Square, 1st Floor	Oklahoma C		73102
Mailing Add	iress	City S	State Zip Co	od <del>e</del>
( 405) 235-556 Telephone		2875 , <u>mccamp</u> x Number	bell@gablela E-mail A	
10. The follow	ing accurately represen	ts the names of	each party in	this matter and
the names and	d addresses of each co	unsel of record v	vho appear fo	r that party:
Party Name	Counsel N	<u>ame</u>	Addre	ss of Counsel
See attac	hed list -		·	

- 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, <u>Martha A. Leibell</u>, 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 5 day of <u>December</u>, 2018.

Martle a. Libell
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

#### APPLICATION OF MARTHA A. LEIBELL OUT OF STATE ATTORNEY REGISTRATION

#### Response to item 10 on the Application:

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

Bradley E. Beckworth
Jeffrey J. Angelovich
Nix, Patterson & Roach
512 N. Broadway Ave., Suite 300
Oklahoma City, OK 73102

Sandy Coats Crowe & Dunlevy 324 N. Robinson Ave., Suite 300 Oklahoma City, OK 73102

Michael Burrage Reggie Whitten Whitten Burrage 512 N. Broadway Ave., Suite 300 Oklahoma City, OK 73102

Glenn Coffee & Associates 915 N. Robinson Avenue Oklahoma City, OK 73102

John Sparks Odom Sparks & Jones 2500 McGee Drive, Suite 140 Norman, OK 73072

# Exhibit B



651 East Jefferson Street Tallahassee, FL 32399-2300

Joshua E. Doyle Executive Director

850/561-5600 www.FLORIDABAR.org

State of Florida

County of Leon )

In Re: 0106990

Martha Anne Leibell

Morgan, Lewis & Bockius LLP

200 South Biscayne Boulevard Suite 5300

Miami, Florida 33131

#### I CERTIFY THE FOLLOWING:

I am the custodian of membership records of The Florida Bar.

Membership records of The Florida Bar indicate that The Florida Bar member listed above was admitted to practice law in the state of Florida on October 10, 2013.

The Florida Bar member above is an active member in good standing of The Florida Bar who is eligible to practice law in the state of Florida.

Dated this 5th day of December, 2018.

Pam Gerard, Manager Membership Records Dept.

The Florida Bar

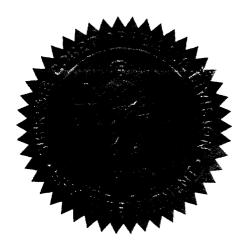
PG:R10 CTM-29517





# Appellate Division of the Supreme Court of the State of New York Second Judicial Department

I, Aprilanne Agostino, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, Martha Anne Teibell do hereby certify that was dulu licensed and admitted to practice as an Attorney and Counselor-at-Caw in all the courts of the State, according to the laws of the State and the court rules and orders, on the 14th day of September 2011, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Connselors-at-Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an Attorney and Counselor-at-Law.



In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on December 18, 2018.

Clerk of the Court

Apilane Agratino

# Exhibit C



## Certificate of Compliance

Oklahoma Bar Association 1901 Aorth 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: December 21st, 2018
- 3. Application Number: 2018-624
- 4. Applying Attorney: Martha A. Leibell

Morgan, Lewis & Bockius LLP

200 South Biscayne Boulevard, Suite 5300

Miami, FL 33131

5. The Application was: **GRANTED** 

Dated this 21st day of December, 2018.

A TO THE PART OF T

Loraine Farabow

First Assistant General Counsel Oklahoma Bar Association