



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 }
FILED

JAN 07 2019

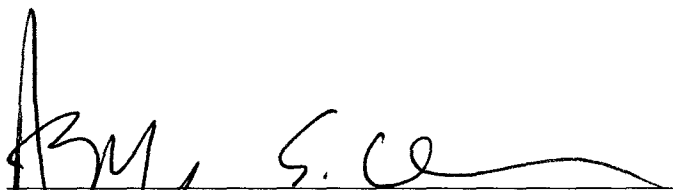
In the office of the
Court Clerk MARILYN WILLIAMS

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
One Leadership Square, 15th Fl.
211 North Robinson
Oklahoma City, OK 73102-7255
T: +1.405.235.3314
E-mail: RMcCampbell@Gablelaw.com
E-mail: NMerkley@Gablelaw.com
E-mail: AQuinn@Gablelaw.com

OF COUNSEL:

Steven A. Reed
Harvey Bartle IV
Mark A. Fiore
Rebecca Hillyer
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103-2921
T: +1.215.963.5000
E-mail: steven.reed@morganlewis.com
E-mail: harvey.bartle@morganlewis.com
E-mail: mark.fiore@morganlewis.com
E-mail: rebecca.hillyer@morganlewis.com

Brian M. Ercole
Melissa M. Coates
Martha A. Leibell
MORGAN, LEWIS & BOCKIUS LLP
200 S. Biscayne Blvd., Suite 5300
Miami, FL 33131
T: +1.305.415.3000
E-mail: brian.ercole@morganlewis.com
E-mail: melissa.coates@morganlewis.com
Email: martha.leibell@morganlewis.com

*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

Bradley E. Beckworth
Jeffrey J. Angelovich
Lloyd N. Duck
NIX, PATTERSON & ROACH
512 N. Broadway Ave., Ste. 200
Oklahoma City, OK 73102

Andrew G. Pate
Lisa Baldwin
Nathan B. Hall
NIX PATTERSON & ROACH
3600 N. Capital of Texas Hwy.
Suite 350
Austin, TX 78746

Glenn Coffee
**GLENN COFFEE &
ASSOCIATES**
915 N. Robinson Ave.
Oklahoma City, OK 73102

Robert Winn Cutler
Ross E Leonoudakis
NIX PATTERSON, LLP
3600 N Capital of Texas Highway,
Suite B350
Austin, TX 78746

<p><i>Attorneys for Johnson & Johnson, Janssen Pharmaceutica, Inc., N/K/A Janssen Pharmaceutics, Inc., and Ortho- McNeil-Janssen Pharmaceutics, Inc. N/K/A Janssen Pharmaceutics, Inc.</i></p>	<p>John H. Sparks Benjamin H. Odom Michael W. Ridgeway David L. Kinney ODOM SPARKS & JONES 2500 McGee Drive, Suite 140 Norman, OK 73072</p>	<p>Charles C. Lifland Jennifer D. Cardelus Wallace M. Allan Sabrina H. Strong Houman Ehsan Esteban Rodriguez O'MELVENY & MEYERS 400 S. Hope Street, 18th Floor Los Angeles, CA 90071</p>
	<p>Stephen D. Brody David Roberts O'MELVENY & MEYERS 1625 Eye Street NW Washington, DC 20006</p>	<p>Daniel J. Franklin Ross B Galin Desirae Krislie Cubero Tongco O'MELVENY & MEYERS 7 Times Square New York, NY 10036</p>
	<p>Amy R. Lucas Lauren S. Rakow Jessica L. Waddle O'MELVENY & MEYERS 1999 Ave. of the Stars, 8th Fl. Los Angeles, CA 90067</p>	<p>Jeffrey A. Barker O'MELVENY & MEYERS 610 Newport Center Drive Newport Beach, CA 92660</p>
	<p>Larry D. Ottaway Amy Sherry Fischer FOLIART, HUFF, OTTAWAY & BOTTOM 201 Robert S. Kerr Avenue, 12th Fl. Oklahoma City, OK 73102</p>	

*Attorneys for
Purdue Pharma,
LP,
Purdue Pharma,
Inc. and The
Purdue Frederick
Company*

Sheila L. Birnbaum
Mark S. Cheffo
Hayden Adam Coleman
Paul LaFata
Jonathan S. Tam
Lindsay N. Zanello
DECHERT LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036

Erik W. Snapp
DECHERT LLP
35 West Wacker Drive, Ste. 3400
Chicago, IL 60601

Benjamin F. McAnaney
DECHERT LLP
2929 Arch Street
Philadelphia, PA 19104

Britta E. Stanton
John D. Volney
John T. Cox, III
Eric W. Pinker
Jared D. Eisenberg
Jervonne D. Newsome
**LYNN PINKER COX &
HURST, LLP**
2100 Ross Avenue, Suite 2700
Dallas, TX 75201

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

Sandy Coats
Joshua Burns
CROWE & DUNLEVY
324 N. Robinson Ave., Ste. 100
Oklahoma City, OK 73102

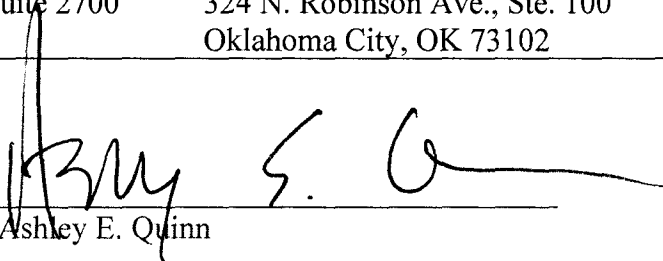

Ashley E. Quinn

Exhibit A

APPLICATION

APPROVED



OUT OF STATE ATTORNEY REGISTRATION

Martha A. Leibell, Applicant, respectfully represents:
First Name Middle Name Last Name

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

Morgan, Lewis & Bockius LLP

with its principal offices located at 200 South Biscayne Boulevard, Suite 5300,
Mailing Address

Miami Miami-Dade, FL, 33131,
City County State Zip Code

(305) 415-3000, (305) 415-3387, (305) 415-3001,
Telephone (Firm) Telephone (Applicant's Direct Dial) Fax (Applicant)

martha.leibell@morganlewis.com If Applicant's office address is different from
E-mail Address (Applicant)

Above 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>Florida</u>	<u>10/10/2013</u>
<u>New York</u>	<u>09/2011</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>
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

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 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. McC Campbell 10390
First Name Middle Name Last Name O.B.A. Number

One Leadership Square, 1st Floor Oklahoma City OH 73102
Mailing Address City State Zip Code

(405) 235-5567 , (405) 235-2875 , mccampbell@gablelaw.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 Counsel Name Address of Counsel

See attached 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, Martha A. Leibell, 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 December, 2018.

Martha A. Leibell
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

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
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



The Florida Bar

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:

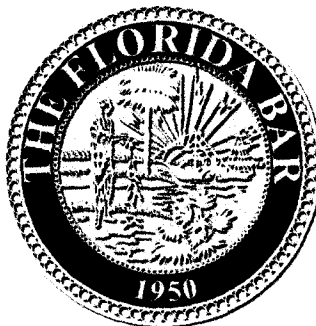
I am the custodian of membership records of The Florida Bar.

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, do hereby certify that **Martha Anne Leibell** was duly licensed and admitted to practice as an Attorney and Counselor-at-Law 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 Counselors-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, 2013.

Aprilanne Agostino

Clerk of the Court

Exhibit C



Certificate of Compliance

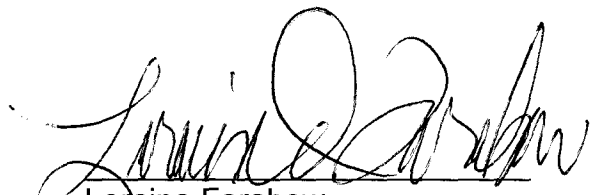
Oklahoma Bar Association
1901 North Lincoln Boulevard
Post Office Box 53036
Oklahoma City, Oklahoma 73152-3036

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: **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.




Loraine Farabow
First Assistant General Counsel
Oklahoma Bar Association