



IN THE DISTRICT COURT OF OKLAHOMA, S.S. CLEVELAND COUNTY

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.

FILED DEC 13 2018 In the office of the Court Clerk MARILYN WILLIAMS

Case No. CJ-2017-816 Judge Thad Balkman

Special Master William Hetherington

THE STATE'S RESPONSE TO PURDUE'S MOTION TO COMPEL PRODUCTION OF CUSTODIAL FILES IN ADVANCE OF DEPOSITIONS

As discovery progresses in this case, Defendants' delay strategy becomes increasingly clear. Purdue's Motion to Compel Production of State Custodial Files and Deposition Dates ("Motion") only highlights this tactic by seeking to compel documents and testimony from many witnesses who have no relevant knowledge and nothing to do with this case. Unfortunately, this burdens the Court with additional premature and unnecessary discovery motions.

On November 26, 2018, Purdue requested the depositions and custodial files for 43 fact

witnesses from the State. *See Ex. 1, 11/26/18 Letter from P. Lafata.* On December 4, 2018, the State requested a meet and confer on presentation of the witnesses and Purdue's request for corresponding custodial files. *Ex. 2, 12/4/18 Email from D. Pate.* Despite the fact that a meet and confer was scheduled for Monday, December 10, 2018, and in continuing disregard for the Court's discovery protocol and Purdue's statutory discovery obligations, Purdue filed its Motion on Thursday, December 6, 2018, prior to any meet and confer. Purdue's Motion should be stricken on this ground alone. *See 12 O.S. § 3237(A)(2)* (requiring a motion to compel to include a statement the movant has in good faith conferred or attempted to confer); *Johnson v. Old Republic Ins. Co.*, 2012 WL 1672995, at *2 (N.D. Okla. May 14, 2012) (motion to compel denied where counsel did not meet and confer in good faith in a sincere attempt to resolve their discovery differences as required by Rule 37); *Rigdon v. Flowserve Corp., et al.*, 2018 WL 2821939, at *1 (N.D. Okla. June 29, 2017) ("The court agrees it would be appropriate to deny CVR's motion for its failure to engage in the good faith conference required by Fed. R. Civ. P. 37(A)(1) and LCvR 37.1.").

As the State would have explained during the meet and confer, and has since explained to Purdue, the State is making many of these witnesses available for depositions. The State has either offered dates or is currently in the process of gathering potential deposition dates from the following 25 witnesses over the next couple of months:

1. Jenny Barnhouse, *Peer Assistance Coordinator, Oklahoma Board of Nursing*
2. Dr. Jason Beaman, *Assistant Clinical Professor, Oklahoma State University – Center for Health Sciences*
3. Burl Beasley, *Assistant Pharmacy Director, Oklahoma Health Care Authority*
4. Deborah Bruce, *Board of Osteopathic Examiners*
5. Terry Cothran, Ph.D., *Director of Pharmacy Management Consultants, University of Oklahoma College of Pharmacy*
6. Steven A. Crawford, M.D., *Chairman, Oklahoma Health Care Authority, Medical Advisory Committee*
7. Carrie Daniels, *State Epidemiological Outcomes Workgroups Coordinator, Oklahoma Department of Mental Health and Substance Abuse Services*

8. Melton Edminsten, *Investigator, Oklahoma Veterinary Board*
9. Jessica Hawkins, *Senior Director, Prevention Services, Oklahoma Department of Mental Health and Substance Abuse Services*
10. Dr. Mike Herndon, *Chief Medical Director, Oklahoma Health Care Authority*
11. Cathy Kirkpatrick, *Executive Director, Oklahoma Veterinary Board*
12. Lynn Mitchell, M.D., M.P.H., *former Chief Medical Officer and Deputy Commissioner for Prevention and Preparedness Services, Oklahoma State Department of Health*
13. Becky Pasternik-Ikard, *Chief Executive Officer, Oklahoma Health Care Authority*
14. Eric Pfeifer, M.D., *Chief Medical Examiner*
15. Mark Reynolds, *Oklahoma Department of Mental Health and Substance Abuse Services*
16. Susan Rodgers, *Executive Director, Oklahoma State Dental Board*
17. Carrie Slatton-Hodges, *Deputy Commissioner, Treatment and Recovery Services, Oklahoma Department of Mental Health and Substance Abuse Services*
18. Mark St. Cyr, D.Ph., *President, Oklahoma State Board of Pharmacy*
19. Mark Stewart, *Chief Agent of Diversion, Oklahoma Bureau of Narcotics and Dangerous Drugs Control*
20. Travis Tate, Pharm.D., *Pharmacy Unit Director, Office of Management & Enterprise Services*
21. Stephanie U'ren, *Director, Oklahoma Department of Health Center for Chronic Disease Prevention and Health Promotion*
22. Don Vogt, *PMP Administrator, Oklahoma Bureau of Narcotics and Dangerous Drugs Control*
23. Terri White, *Commissioner, Oklahoma Department of Mental Health and Substance Abuse Services*
24. Mark Woodward, *Spokesman for Oklahoma Bureau of Narcotics*
25. Steven Buck, *Executive Director, Oklahoma Office of Juvenile Affairs*

The parties may also be able to reach an agreement with respect to the many of the remaining 18 witnesses. The State is still attempting to confer with Purdue on the remaining individuals. Had Purdue waited to file its Motion until after a meet and confer was conducted, as it was required to do, it would have known this. Purdue's Motion is premature and largely unnecessary.

In addition, many of the people Purdue is requesting to depose have little or no knowledge about the issues in this case and would result in cumulative or duplicative testimony. For example, Purdue has requested the depositions of **eight people**¹ from Oklahoma Management and Enterprise

¹ These individuals include Ferris Barger, Nichole King, Paul King, Frank Lawler, M.D., Diana O'Neal, Teresa South, Travis Tate, and Frank Wilson.

Systems (“OMES”), which is largely responsible for information technology services for various State agencies. This agency has little relevant and discoverable knowledge to the State’s claims or Purdue’s defenses. Because OMES also oversees HealthChoice, a State employee health insurance program, the State has agreed to produce Travis Tate, the Pharmacy Unit Director for OMES, but there is simply no reason to present **seven additional people** from this department. In fact, Purdue has requested double the number of witnesses from OMES than it has from the Oklahoma Health Care Authority, the agency responsible for providing health insurance benefits for the State’s SoonerCare members and for whom the State has produced the most documents. This makes no sense and is clearly part of Defendants’ calculated strategy to bog down the State and its counsel with unnecessary depositions in order to waste time and distract the State (and the Court) from the merits of the State’s claims. Perhaps nothing demonstrates this calculated strategy better than the fact that Purdue is attempting to re-depose, without leave of Court, a witness who has already been deposed in this case, Nancy Nesser. The requested depositions are cumulative and unnecessary. *See* 12 O.S. § 3226(B)(2)(c) (court shall limit the frequency or extent of discovery otherwise allowed if it determines the discovery sought is unreasonably cumulative or duplicative).

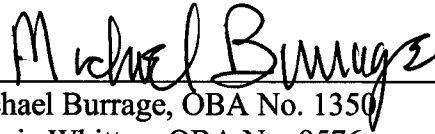
Purdue’s Motion is part of its continuous attempt to hijack the discovery process. Purdue argues the State has failed to produce any custodial files for the 43 witnesses it seeks to depose and should be compelled to do so. This is misleading. The State continues to make rolling document productions in response to Defendants’ discovery requests. It is continually searching for, locating, and producing responsive document, some of which may in fact may be contained within a witness’s custodial file. But the process does not and cannot work as Purdue’s suggests. Purdue does not get to dictate the priority of documents being produced. As an example, Purdue is seeking the deposition of Susan Rodgers, the Executive Director of the Oklahoma State Dental

Board. The State is willing to present Ms. Rodgers for a deposition, but it is not the State's obligation to pull and produce Ms. Rodgers complete "custodial file" in advance of her deposition, irrespective of responsiveness. Rather, the State has an obligation to respond to Defendants' discovery requests by searching for responsive documents, some of which may or may not be in Ms. Rodgers' custody. In other words, the State should not be forced to pull the entire contents of a witness's "custodial file" merely because Purdue sent a request to take her deposition, especially when that individual may have no responsive documents in her possession and no knowledge about the issues in the case. *See, e.g., In re Simply Orange Orange Juice Mktg. & Sales Practices Litig*, 2018 WL 522785, at *2 (W.D. Mo. Jan. 23, 2018) (plaintiff not entitled to custodial files of witnesses defendant intended to call in support of its case without establishing the relevance of the files to any of the certified issues).

CONCLUSION

For the reasons set forth above, the State respectfully requests the Court deny Purdue's Motion as both premature and unnecessary. Many of the 43 requested depositions will occur without disagreement, documents relevant to those depositions have been or will be produced, and some of the requested depositions are unnecessary as the witnesses have no relevant knowledge of the issues in this case.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above and foregoing was emailed on December 13, 2018 to:

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November 26, 2018

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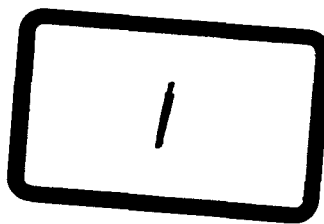
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Re: *Oklahoma ex rel. Hunter v. Purdue Pharma, LP, CJ -2017-816*

Dear Counsel:

I write in regard to Purdue's October 30, 2018 letter to the State, requesting custodial files from the individuals listed below. We never received a response to our letter, and it appears that the State has only produced one custodial file out of those requested. Please let us know if we are mistaken, and when we can expect to see the rest of the requested custodial files. Additionally, please let us know when the witnesses are available to be deposed. A witness's custodial file should be produced at least 14 days in advance of his/her deposition.



- **Ferris Barger**, State Purchasing Director, Office of Management & Enterprise Services
- **Jenny Barnhouse**, Peer Assistance Program Coordinator, Oklahoma Board of Nursing
- **Dr. Jason Beaman**, Assistant Clinical Professor, Oklahoma State University-Center for Health Sciences
- **Burl Beasley**, Assistant Pharmacy Director, Oklahoma Healthcare Authority
- **Deborah Bruce**, Board of Osteopathic Examiners
- **Steven Buck**, Executive Director, Oklahoma Office of Juvenile Affairs
- **Ellen Buettner**, Director, Human Resources Development, Oklahoma Department of Mental Health and Substance Abuse Services
- **Terry Cothran, Ph.D.**, Director of Pharmacy Management Consultants, University of Oklahoma College of Pharmacy
- **Steven A. Crawford, M.D.**, Chairman, Oklahoma Health Care Authority, Medical Advisory Committee
- **Durand Crosby**, Chief of Staff and Operations, Oklahoma Department of Mental Health and Substance Abuse Services
- **Carrie Daniels**, State Epidemiological Outcomes Workgroups Coordinator, Oklahoma Department of Mental Health and Substance Abuse Services
- **Melton Edminsten**, Investigator, Oklahoma Veterinary Board
- **Dr. Mike Herndon**, Chief Medical Director, Oklahoma Healthcare Authority
- **Jessica Hawkins**, Senior Director, Prevention Services, Oklahoma Department of Mental Health and Substance Abuse Services
- **Nichole King**, Director, Third Party Administrator Management, Employees Group Insurance Division, Office of Management & Enterprise Services
- **Paul King**, Compliance and Industry Practice Director, Office of Management & Enterprise Services

- **Cathy Kirkpatrick**, Executive Director, Oklahoma Veterinary Board
- **Frank Lawler, M.D.**, Medical Director, Office of Management & Enterprise Services
- **Mark Liotta**, Chairman, Oklahoma Workers' Compensation Commission
- **Liz Massey**, Vice President, Oklahoma Board of Nursing
- **Lynn Mitchell, M.D., M.P.H.**, former Chief Medical Officer and Deputy Commissioner for Prevention and Preparedness Services, Oklahoma State Department of Health
- **Steven M. Montgomery**, Chairman, Oklahoma Employees Insurance and Benefits Board
- **Nancy Nesser**, Pharmacy Director, Oklahoma Healthcare Authority
- **Diana O'Neal**, Deputy Administrator, Office of Management and Enterprise Systems
- **Becky Pasternik-Ikard**, Chief Executive Officer, Oklahoma Health Care Authority
- **Eric Pfeifer, M.D.**, Chief Medical Examiner
- **Bob Ricks**, Interim Director, Oklahoma State Bureau of Investigation
- **Mark Reynolds**, Oklahoma Department of Mental Health and Substance Abuse Services
- **Susan Rodgers**, Executive Director, Oklahoma State Dental Board
- **Carrie Slatton-Hodges**, Deputy Commissioner, Treatment and Recovery Services, Oklahoma Department of Mental Health and Substance Abuse Services
- **Teresa South**, Network Management Director, Office of Management & Enterprise Services
- **Mark St. Cyr, D.Ph.**, President, Oklahoma State Board of Pharmacy
- **Patricia Sommer**, Interim Executive Director, Oklahoma Workers' Compensation Commission

- **Mark Stewart**, Chief Agent of Diversion, Oklahoma Bureau of Narcotics and Dangerous Drugs Control
- **Travis Tate**, Pharm.D., Pharmacy Unit Director, Office of Management & Enterprise Services
- **Stephanie U'ren**, Director, Oklahoma Department of Health Center for Chronic Disease Prevention and Health Promotion
- **Reji Varghese**, Deputy Director, Oklahoma Board of Medical Licensure and Supervision
- **Don Vogt**, PMP Administrator, Oklahoma Bureau of Narcotics and Dangerous Drugs Control
- **Terri Watkins**, Director of Communications, Oklahoma Attorney General
- **Terri White**, Commissioner, Oklahoma Department of Mental Health and Substance Abuse Services
- **Frank Wilson**, Employees Group Insurance Division Administrator, Office of Management & Enterprise Services
- **Mark Woodward**, Spokesman for Oklahoma Bureau of Narcotics

Very truly yours,

/s/ Paul LaFata

Paul LaFata

Cc: Counsel of record for Defendants (via email)

McAnaney, Benjamin

From: McAnaney, Benjamin
Sent: Tuesday, December 4, 2018 1:03 PM
To: 'Drew Pate'
Cc: Rosenberg, Rachel; 'Abby Dillsaver'; Brad Beckworth; 'Ethan A. Shaner'; gcoffee@glenncoffee.com; Lisa Baldwin; Trey Duck; mburrage@whittenburrage.com; rwhitten@whittenburrage.com; Cc: "Ashley E. Quinn"; EXT Brian Ercole; EXT Harvey Bartle IV; 'Nicholas V. Merkley'; 'Rebecca Hillyer'; 'Robert G. McCampbell'; EXT Steven A. Reed; 'Benjamin H. Odom'; 'Charles C. Lifland'; 'David K. Roberts'; 'David L. Kinney'; EXT Jen Cardelus; 'John H. Sparks'; 'Michael W. Ridgeway'; EXT sbrody@omm.com; Coleman, Hayden; Joshua Burns; LaFata, Paul; 'Robert S. Hoff'; Sanford C. Coats; Tam, Jonathan; Snapp, Erik; Cheffo, Mark; Birnbaum, Sheila; Cheffo, Mark; Cusker Gonzalez, Mara; Schwarz, Marina
Subject: RE: State of Oklahoma ex rel. Mike Hunter v. Purdue: Letter from P. LaFata

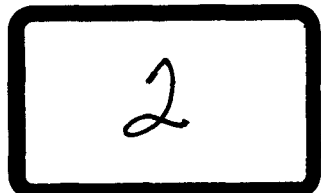
Drew,

Our request for custodial files has been pending since October 30 and our request for deposition dates since November 26. We are disappointed that the State is not available to meet and confer until Friday afternoon, which does not work for us. To be clear, we can also be available tomorrow. If that does not work for the State, and it appears it does not, we can try to find a time on Monday. This is important discovery and we are simply running out of time given the State's insistence that the existing schedule is workable. We will raise these related issues with Judge Hetherington as appropriate.

From: Drew Pate [mailto:dpate@nixlaw.com]
Sent: Tuesday, December 4, 2018 11:45 AM
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Subject: Re: State of Oklahoma ex rel. Mike Hunter v. Purdue: Letter from P. LaFata

Ben,

I'm tied up today but can discuss on Friday afternoon if that works for you.



Thanks,

Drew

Drew Pate



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Date: Tuesday, December 4, 2018 at 10:22 AM
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Cc: "Rosenberg, Rachel" <rachel.rosenberg@dechert.com>, 'Abby Dillsaver' <abby.dillsaver@oag.ok.gov>, Brad Beckworth <bbeckworth@nixlaw.com>, "Ethan A. Shaner" <ethan.shaner@oag.ok.gov>, "gcoffee@glenncoffee.com" <gcoffee@glenncoffee.com>, Lisa Baldwin <lbaldwin@nixlaw.com>, Trey Duck <tduck@nixlaw.com>, "mburrage@whittenburrage.com" <mburrage@whittenburrage.com>, "rwhitten@whittenburrage.com" <rwhitten@whittenburrage.com>, "Cc: "Ashley E. Quinn" <aquinn@gablelaw.com>, EXT Brian Ercole <brian.ercole@morganlewis.com>, EXT Harvey Bartle IV <harvey.bartle@morganlewis.com>, "Nicholas V. Merkley" <nmerkley@gablelaw.com>, 'Rebecca Hillyer' <rebecca.hillyer@morganlewis.com>, "Robert G. McCampbell" <rmccampbell@gablelaw.com>, "EXT Steven A. Reed" <steven.reed@morganlewis.com>, "Benjamin H. Odom" <odomb@odomsparks.com>, "Charles C. Lifland" <clifland@omm.com>, "David K. Roberts" <droberts2@omm.com>, "David L. Kinney" <kinneyd@odomsparks.com>, EXT Jen Cardelus <jcardelus@omm.com>, "John H. Sparks" <sparksj@odomsparks.com>, "Michael W. Ridgeway" <ridgewaym@odomsparks.com>, "EXT sbrody@omm.com" <sbrody@omm.com>, "Coleman, Hayden" <Hayden.Coleman@dechert.com>, Joshua Burns <joshua.burns@crowedunlevy.com>, "LaFata, Paul" <Paul.LaFata@dechert.com>, "Robert S. Hoff" <rhoff@wiggin.com>, "Sanford C. Coats" <sandy.coats@crowedunlevy.com>, "Tam, Jonathan" <Jonathan.Tam@dechert.com>, "Snapp, Erik" <Erik.Snapp@dechert.com>, "Cheffo, Mark" <Mark.Cheffo@dechert.com>, "Birnbaum, Sheila" <Sheila.Birnbaum@dechert.com>, "Cheffo, Mark" <Mark.Cheffo@dechert.com>, "Cusker Gonzalez, Mara" <MaraCusker.gonzalez@dechert.com>, "Schwarz, Marina" <Marina.Schwarz@dechert.com>
Subject: FW: State of Oklahoma ex rel. Miike Hunter v. Purdue: Letter from P. LaFata

Drew,

I am available to meet and confer this afternoon. Please let me know when you are available and I will circulate a dial-in for anybody who wishes to attend.

Regards,

Benjamin McAnaney
Associate

Dechert LLP

Cira Centre
2929 Arch Street
Philadelphia, PA 19104-2808
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From: Drew Pate <dpate@nixlaw.com>

Date: December 4, 2018 at 8:59:15 AM EST

To: "Rosenberg, Rachel" <rachel.rosenberg@dechert.com>, 'Abby Dillsaver' <abby.dillsaver@oag.ok.gov>, Brad Beckworth <bbeckworth@nixlaw.com>, "Ethan A. Shaner" <ethan.shaner@oag.ok.gov>, "gcoffee@glenncoffee.com" <gcoffee@glenncoffee.com>, Lisa Baldwin <lbaldwin@nixlaw.com>, Trey Duck <tduck@nixlaw.com>, "mburrage@whittenburragelaw.com" <mburrage@whittenburragelaw.com>, "rwhitten@whittenburragelaw.com" <rwhitten@whittenburragelaw.com>

Cc: "Ashley E. Quinn" <aquinn@gablelaw.com>, EXT Brian Ercole <brian.ercole@morganlewis.com>, EXT Harvey Bartle IV <harvey.bartle@morganlewis.com>, "Nicholas V. Merkley" <nmerkley@gablelaw.com>, 'Rebecca Hillyer' <rebecca.hillyer@morganlewis.com>, "Robert G. McCampbell" <rmccampbell@gablelaw.com>, "EXT Steven A. Reed" <steven.reed@morganlewis.com>, "Benjamin H. Odom" <odomb@odomsparks.com>, "Charles C. Lifland" <clifland@omm.com>, "David K. Roberts" <droberts2@omm.com>, "David L. Kinney" <kinneyd@odomsparks.com>, "EXT Jen Cardelus" <jcardelus@omm.com>, "John H. Sparks" <sparksj@odomsparks.com>, "Michael W. Ridgeway" <ridgewaym@odomsparks.com>, "EXT sbrody@omm.com" <sbrody@omm.com>, "Coleman, Hayden" <hayden.coleman@dechert.com>, "Snapp, Erik" <Erik.Snapp@dechert.com>, "Tam, Jonathan" <Jonathan.Tam@dechert.com>, Joshua Burns <joshua.burns@crowedunlevy.com>, "LaFata, Paul" <paul.lafata@dechert.com>, "Robert S. Hoff" <rhoff@wiggin.com>, "Sanford C. Coats" <sandy.coats@crowedunlevy.com>, "Cheffo, Mark" <mark.cheffo@dechert.com>, "Birnbaum, Sheila" <sheila.birnbaum@dechert.com>, "Cusker Gonzalez, Mara" <MaraCusker.gonzalez@dechert.com>, "Schwarz, Marina" <Marina.Schwarz@dechert.com>

Subject: Re: State of Oklahoma ex rel. Mike Hunter v. Purdue: Letter from P. LaFata

Paul,

When are you available to meet and confer regarding this letter?

Thanks,

Drew

Drew Pate



NIX PATTERSON LLP

3600 N. Capital of Texas Hwy.
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Austin, TX 78746
512-328-5333
Dpate@nixlaw.com

From: "Rosenberg, Rachel" <rachel.rosenberg@dechert.com>
Date: Monday, November 26, 2018 at 9:18 PM
To: 'Abby Dillsaver' <abby.dillsaver@oag.ok.gov>, Drew Pate <dpate@nixlaw.com>, Brad Beckworth <bbeckworth@nixlaw.com>, "Ethan A. Shaner" <ethan.shaner@oag.ok.gov>, "gcoffee@glenncoffee.com" <gcoffee@glenncoffee.com>, Lisa Baldwin <lbaldwin@nixlaw.com>, Trey Duck <tduck@nixlaw.com>, "mburrage@whittenburragelaw.com" <mburrage@whittenburragelaw.com>, "rwhitten@whittenburragelaw.com" <rwhitten@whittenburragelaw.com>
Cc: "Ashley E. Quinn" <aquinn@gablelaw.com>, EXT Brian Ercole <brian.ercole@morganlewis.com>, EXT Harvey Bartle IV <harvey.bartle@morganlewis.com>, "Nicholas V. Merkley" <nmerkley@gablelaw.com>, 'Rebecca Hillyer' <rebecca.hillyer@morganlewis.com>, "Robert G. McCampbell" <rmccampbell@gablelaw.com>, "EXT Steven A. Reed" <steven.reed@morganlewis.com>, "Benjamin H. Odom" <odomb@odomsparks.com>, "Charles C. Lifland" <clifland@omm.com>, "David K. Roberts" <droberts2@omm.com>, "David L. Kinney" <kinneyd@odomsparks.com>, EXT Jen Cardelus <jcardelus@omm.com>, "John H. Sparks" <sparksj@odomsparks.com>, "Michael W. Ridgeway" <ridgewaym@odomsparks.com>, "EXT sbrody@omm.com" <sbrody@omm.com>, "Coleman, Hayden" <hayden.coleman@dechert.com>, "Snapp, Erik" <Erik.Snapp@dechert.com>, "Tam, Jonathan" <Jonathan.Tam@dechert.com>, Joshua Burns <joshua.burns@crowedunlevy.com>, "LaFata, Paul" <paul.lafata@dechert.com>, "Robert S. Hoff" <rhoff@wiggins.com>, "Sanford C. Coats" <sandy.coats@crowedunlevy.com>, "Cheffo, Mark" <mark.cheffo@dechert.com>, "Birnbaum, Sheila" <sheila.birnbaum@dechert.com>, "Cusker Gonzalez, Mara" <MaraCusker.gonzalez@dechert.com>, "Schwarz, Marina" <Marina.Schwarz@dechert.com>
Subject: State of Oklahoma ex rel. Mike Hunter v. Purdue: Letter from P. LaFata

Counsel,

Attached please find a letter from Paul LaFata.

Thank you,
Rachel

Rachel Rosenberg
Associate

Dechert LLP
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rachel.rosenberg@dechert.com
dechert.com

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