STATI CLEV CLEV FILED 10 4 2 0 8 9 3 8 6 \* Office of the Court Clerk

## IN THE DISTRICT COURT OF CLEVELAND COUNTY STATE OF OKLAHOMA

DEC 18 2018

STATE OF OKLAHOMA, ex rel., MIKE HUNTER, ATTORNEY GENERAL OF OKLAHOMA,	) In the office of the Court Clerk MARILYN WILLIAMS
Plaintiff,	)
V.	) Case No. CJ-2017-816
PURDUE PHARMA L.P., et al.,	)
Defendants.	) )

#### MOTION TO ASSOCIATE MARA C. CUSKER GONZALEZ 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 Mara C. Cusker Gonzalez 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 of Good Standing" (Exhibit B), and the "Certificate of Compliance" from the Oklahoma Bar Association (Exhibit C).

DATED: December <u>[8]</u>, 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 December, 2018 to:

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

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

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

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

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

Stephen D. Brody David K. Roberts O'Melveny & Myers, LLP 1625 Eye Street NW Washington, DC 20006 Michael Burrage Reggie Whitten Whitten Burrage 512 North Broadway Avenue, Suite 300 Oklahoma City, Oklahoma 73102

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

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

Steven A. Reed Harvey Bartle IV Rebecca Hillyer Lindsey T. Mills Morgan, Lewis & Bockius LLP 1701 Market Street Philadelphia, PA 19103-2921

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

Safal Lit

## **APPLICATION**



#### **OUT OF STATE ATTORNEY REGISTRATION**

_Ma		C.				zalez	, Ap	plic	ant, re	espe	ectfu	lly re	presents:
	t Name		e Name		ist Name								
1. A	pplicant i	s an a	ittorney	/ at la	w and a	a memb	er o	f th	e law	firm	of	Dec	hert LLP
with	its princi	pal of	fices lo	cated	at								
	ee Bryant	Park	1095	<u>Aven</u> ı	ue of th	e Amer	icas						·
Mailir	ng Address												
New	Y York City			New `	York	NY		_, 1	0036	<u>-679</u>	97		
( <u>212</u>	City 2) 698-35 Telephone	500 (Firm)	V*-V	Cou <sub>1</sub> , , T	nty ( <u>212)</u> elephone	State 641-566 (Applicant's	55 Direc	t Dial	Zip Co , (; !)	ode <b>212</b> Fax (	) 69 (Applio	8-359 cant)	9
mar	acusker.c I Address (Ap	gonza											
lf Ap	oplicant's	office	addre	ss is c	differen	t from a	bove	∋,					
plea	ise provic	de the	followi	na:									
	р. с					٨	/lailing	Addı	ress				
	City	у	,		County		——' .	Stat	<del>,</del>		Zip (	Code	,
2.	Applicar	nt is	admitte	ed to	practi	ce and	is	а	memb	oer	in g	good	standing
(sta	tements	attacl	ned) of	f the	bar(s)	of the	hig	hes	st cou	urt(s	) of	the	following
state	e(s):												
	<u>State</u>								<u>Date</u>	of A	Adm	nissio	<u>n</u>
New	/ York								05/1	5/20	006		
									· · · · · · · · · · · · · · · · · · ·			· · · · · · · · · · · · · · · · · · ·	
			·										

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:

Tribunal	Date of Admission						
Southern District of New York	08/22/2018						
Eastern District of New York	08/17/2010						
Western District of New York	05/19/2017						
U.S.C.A. Fourth Circuit	02/15/2017						
U.S.C.A. Ninth Circuit	06/02/2017						
<ol> <li>Applicant is not currently suspended or disbarred in any court except as hereinafter provided (Give particulars; e.g. court, jurisdiction, date): No.</li> <li>Applicant is not 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.</li> <li>Applicant has never 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.</li> <li>Applicant has never 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</li> </ol>							
<ul><li>8. Applicant seeks admission to practice in the State of Oklahoma in the</li></ul>							
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. CJ-2017-816, District Court of							
Cleveland County; representing Purdue Pharma L.P., Purdue Pharma Inc., and							
The Purdue Frederick Company Inc.							
9. The Oklahoma Bar Association member Applicant in this matter is:  Sanford C. Coat  First Name Middle Name Last Name	s 18268						

324 N. Robinson Ave.	, <u>Oklahoma City,</u>	<u>OK</u> , <u>731</u>	02		
Mailing Address	City	State Zip Co	de		
(405) 235-7700	(405) 2	39-6651			
Telephone Number	Fax Numb		<del></del>		
sandy.coats@crowedunlev	vy.com				
E-mail Address					
10. The following accurate	ely represents the n	ames of ea	ch 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		
Please see addendum					
r redec des adderradir.					
	<del></del>				
11. Applicant certifies that	he/she shall be subj	ect to the ju	urisdiction of the courts		
and disciplinary boards of this state with respect to the laws of this state					
governing the conduct of	attorneys to the sa	ame extent	as a member of the		
Oklahoma Bar Association					
12. Applicant understands	s and shall comply v	vith the sta	ndards of professional		
conduct required of membe	ers of the Oklahoma	Bar Associa	ation.		
13. Applicant has disclo	sed in writing to the	e client tha	t the Applicant is not		
admitted to practice in th	is jurisdiction and th	ne client h	as consented to such		
representation.					

!

I, <u>Mara C. Cusker Gonzalez</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 29 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 100B

ADDENDUM to the Out of State Attorney Registration Application of Mara C. Cusker Gonzalez

Item 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.; and The Purdue Frederick Company Inc.	Sanford C. Coats	324 N. Robinson Ave. Ste. 100, Oklahoma City, OK 73102
Cephalon, Inc.; Teva Pharmaceuticals USA, Inc.; Watson Laboratories, Inc.; Actavis LLC; and Actavis Pharma, Inc. f/k/a Watson Pharma, Inc.	Robert G. McCampbell Nicholas Merkley	One Leadership Square, 15th Fl., 211 North Robinson, Oklahoma City, OK 73102-7255
Janssen Pharmaceuticals, Inc.; Johnson & Johnson; Janssen Phannaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc.; and Ortho-McNeilanssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc.	Benjamin H. Odom John Sparks	HiPoint Office Building, 2500 McGee Drive Ste. 140, Oklahoma City, OK 73072
Janssen Pharmaceuticals, Inc.; Johnson & Johnson; Janssen Phannaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc.; and Ortho-McNeilanssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc.	Larry D. Ottaway Amy Sherry Fischer	201 Robert S. Kerr Ave. 12th Floor Oklahoma City, OK 73102

State of Oklahoma, ex rel., Mike Hunter, Attorney General of Oklahoma	Michael Burrage Reggie Whitten	512 N. Broadway Avenue, Suite 300, Oklahoma City, OK 73102		
	Mike Hunter Abby Dillsaver Ethan A. Shaner	313 N.E. 21st Street, Oklahoma City, OK 73105		
	Bradley E. Beckworth Jeffrey J. Angelovich	512 N. Broadway Avenue, Suite 200, Oklahoma City, OK 731 02		
	Glenn Coffee	915 N. Robinson Ave., Oklahoma City, OK 73 102		

ļ

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

I, Susanna Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, certify that

### MARA CAITLIN CUSKER GONZALEZ

was duly licensed and admitted to practice as an Attorney and Counsellor at Law in all the courts of the State of New York on May 15, 2006, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counsellors 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 counsellor at law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of this court on

December 7, 2018

325

Clerk of the Court



## 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 12, 2018
- 3. Application Number: 2018-607
- 4. Applying Attorney: Mara C. Cusker Gonzalez

Dechert LLP

Three Bryant Park, 1095 Avenue of the Americas

New York, NY 10036

5. The Application was: **GRANTED** 

Dated this 12th day of December, 2018.



Gina L. Hendryx, General Counsel Oklahoma Bar Association