STATE OF \*1042089733\*
CLEVELAND COUNTY'S.S.
FILED In The

# IN THE DISTRICT COURT OF CLEVELAND COURT of the Court Clerk STATE OF OKLAHOMA JAN 02 2010

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

#### MOTION TO ASSOCIATE ELIZABETH YVONNE RYAN 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 Elizabeth Yvonne Ryan 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: January 2, 2019.

SANFORD C. COATS, OBA #18268 JOSHUA D. BURNS, OBA #32967

**CROWE & DUNLEVY** 

Respectfully submitted.

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 2 day of January, 2019 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 & 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

Sof Joseph

## **APPLICATION**



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

Elizabeth Yvonne Ryan	, Applicant,
respectfully represents: First Name Middle Name Last Name	
1. Applicant is an attorney at law and a member	er of the law firm of <u>Lynn Pinker</u>
Cox & Hurst, LLP ("LPCH")	
with its principal offices located at2100 Ross	S Avenue, Suite 2700
Dallas , Dallas ,	TX , 75201 ,
City County  (214) 981-3800 , ( )  Telephone (Firm) Telephone (Applicant's Direct I	State Zip Code _, (214 ) 981-3839 Dial) Fax (Applicant)
eryan@lynnllp.com	If Applicant's office address is
different from above, E-mail Address (Applicant)	
please provide the following: NA	
Mail	ing Address
City County	State Zip Code
2. Applicant is admitted to practice and	s a member in good standing
(certificates of good standing attached) of the t	ear(s) of the highest state court(s)
of the following state(s):	
<u>State</u>	Date of Admission
State Bar of Texas	5/1/2009
Virginia (muchie)	
3. Applicant is admitted to practice before th Courts, United States Circuit Courts of Appeal, States, and/or other tribunals on the dates indimember in good standing of the bars of said co	the Supreme Court of the United cated for each, and is presently a
Tribunal	Date of Admission
United States Court of Appeals for the Sixth Circu	it 2008

Western District of Texas	2/2010		
Northern District of Texas	2/2010		
Northern District of Texas, Bankruptcy Division	2/2010		
Eastern District of Texas	2/2010		
Southern District of Texas	2/2010		
4. Have you ever been suspended or disbarred hereinafter provided (Give particulars; e.g. court			
5. Are you currently subject to any pending discorganization with authority to discipline attorneys provided (Give particulars; e.g. court, discipline statements)	s at law except as hereinafter		
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, status	with authority to discipline (Give particulars; e.g. court,		
7. Have you ever had any certificate or privilege any regulatory or administrative body suspended hereinafter provided (Give particulars; e.g. admissuspension or reinstatement):	d or revoked except as		
	· · · · · · · · · · · · · · · · · · ·		
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 appli	icant seeks admission! State of		
Oklahoma, ex rel., Mike Hunter, Attorney Ger	neral of Oklahoma v. (1) Purdue		
Pharma, L.P., (2) Purdue Pharma, Inc., (3) The	e 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.; Case No. CJ-2017-816, in the District Court of Cleveland County, State of Oklahoma; This is a fraud and consumer protection action. LPCH seeks to represent (1) Purdue Pharma, L.P., (2) Purdue Pharma, Inc., and (3) The Purdue Frederick Company.

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

Sanford	C	Coats	182	68	
First Name	Middle Name	Last Name	O.B.A.	Number	
324 N. Robinson Mailing Address	Avenue, Suite 100	, Oklahoma City City	State	73102 Zip Code	,
(405) 235-7700 , (405) 239-6651 , sandy.coats@crowedunlevy.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(S)	COUNSEL NAME(S)	ADDRESS OF COUNSEL
Purdue Pharma L.P.	Sanford C. Coats Joshua D. Burns	324 N. Robinson Avenue, Suite 100 Oklahoma City, OK 73102
Purdue Pharma Inc.		
The Purdue Frederick Company Inc.		

Teva Pharmaceuticals USA, Inc.  Cephalon, Inc.  Watson Laboratories, Inc.  Actavis LLC  Actavis Pharma, Inc. f/k/a  Watson Pharma, Inc.	Robert G. McCampbell Nicholas Merkley	One Leadership Square 15th Floor, 211 North Robinson Oklahoma City, OK 73102-7255
Johnson & Johnson  Janssen Pharmaceuticals, Inc.  Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc.  Janssen Phannaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc.	Benjamin H. Odom John Sparks	HiPoint Office Building 2500 McGee Drive Suite 140 Oklahoma City, OK 73072
Johnson & Johnson  Janssen Pharmaceuticals, Inc.  Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc.  Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc.	Larry D. Ottaway Amy Sherry Fischer	201 Robert S. Kerr Avenue 12 <sup>th</sup> 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 73102
	Glenn Coffee	915 N. Robinson Avenue Oklahoma City, OK 73102

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, Elizabeth Ryan, 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 13 day of December , 2018

Estrusaus Applicarit

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

### STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

December 10, 2018

Re: Ms. Elizabeth Yvonne Ryan, State Bar Number 24067758

To Whom It May Concern:

This is to certify that Ms. Elizabeth Yvonne Ryan was licensed to practice law in Texas on May 01, 2009, 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,

Linda A. Acevedo Chief Disciplinary Counsel

LA/web



# VIRGINIA STATE BAR

### CERTIFICATE OF GOOD STANDING

THIS IS TO CERTIFY THAT ELIZABETH YVONNE MCELROY IS AN ASSOCIATE (INACTIVE) MEMBER
OF THE VIRGINIA STATE BAR IN GOOD STANDING. MS. MCELROY WAS LICENSED TO PRACTICE LAW IN
VIRGINIA ON OCTOBER 17, 2007, AFTER SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE
BOARD OF BAR EXAMINERS.

Issued December 14, 2018

KAREN A. GOULD
EXECUTIVE DIRECTOR AND
CHIEF OPERATING OFFICER



### 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 20, 2018

3. Application Number: 2018-619

4. Applying Attorney: Elizabeth Yvonne Ryan

Lynn Pinker Cox & Hurst, LLP 2100 Ross Avenue, Suite 2700 Dallas, TX 75201

5. The Application was: **GRANTED** 

Dated this 20th day of December, 2018.

Section 19 Section 19

Gina L. Hendryx, General Counse Oklahoma Bar Association