## IN THE DISTRICT COURT OF CLEVELAND COUNTY STATE OF OKLAHOMA JAN 02 2019

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STATE OF OKLAHOMA, *ex rel.*, MIKE HUNTER, ATTORNEY GENERAL OF OKLAHOMA,

Plaintiff,

v.

PURDUE PHARMA L.P., et al.,

Defendants.

In the office of the Court Clerk MARILYN WILLIAMS

FILED In The

State of ( Clevelani

Case No. CJ-2017-816

MOTION TO ASSOCIATE ANDREA MESHONN EVANS BROWN 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 Andrea MeShonn Evans Brown 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.

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 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 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

APPLICA	ΓΙΟΝ				OKLAHO Manager		AND TION.
OUT OF STATE A	TTORNEY R	A STRA	TION				
represents:	MeShonn ddle Name	Evans Last Name			, Applica	ant, re:	spectfully
1. Applicant is an	attorney at la	aw and a r	nember	of the la	aw firm c	of <u>Lyr</u>	<u>nn Pinker</u>
Cox & Hurst, LLP	("LPCH")						<u> </u>
with its principal o			Mailing	g Address		00	
Dallas City		, <u>Dallas</u> <sub>Coun</sub>		<u>TX</u> ,,	75201 Zip C		
(214) 981-3800 Telephone (Firm)	, ( <u>214)</u> Telept	981-3807		, (214	) 981-38		
sbrown@lynnllp.cd different from above E-mail Address (Applicant)				lf App	licant's c	office a	ddress is
please provide the	e following:					<u></u>	
		Mailing Address					
City	<u></u> 1 <u></u>	County	······································	, State	Zip	Code	,
2. Applicant is	admitted to	practice	and is	a mem	nber in	good	standing
(certificates of goo	od standing a	ttached) o	f the ba	r(s) of th	e highe	st state	e court(s)
of the following sta	ate(s):						
<u>State</u>				Dat	e of Adr	nission	<u>1</u>
Texas					11/6/98		
3. Applicant is a Courts, United Sta States, and/or oth member in good s	ates Circuit C er tribunals o	ourts of A on the date	ppeal, th es indica	ne Supre ted for e	eme Cou	irt of th	ne United
Tribunal				Dat	e of Adn	nissior	<u>1</u>

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U.S. Court of Appeals for the Fifth Circuit	May 4, 2005
U.S. District Court for the Northern District of Texas	July 16, 1999

4. Have you ever been suspended or disbarred in any court except as hereinafter provided (Give particulars; e.g. court, jurisdiction, date): <u>NO</u>

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! <u>State of Oklahoma, ex rel.</u>, Mike Hunter, Attorney General of Oklahoma v. (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.; 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	18268	
First Name	Middle Name	Last Name	O.B.A. Nur	mber
324 N. Robinson A Mailing Address	<u>Avenue, Suite 100</u>	), <u>Oklahoma City</u> , <sub>City</sub>	<u>OK</u> , <u>7</u> State	2 <mark>3102</mark> , Zip Code
(405) 235-7700 Telephone Number	, <u>(405) 239-66</u> Fax Number		s@crowed ail Address	unlevy.com
10. The following	accurately repre	sents the names	of each pa	rty in this matter

and the names and addresses of each counsel of record who appear for that party:

COUNSEL NAME(S) ADDRESS OF COUNSEL PARTY NAME(S) Purdue Pharma L.P. 324 N. Robinson Avenue, Suite 100 Sanford C. Coats Joshua D. Burns Oklahoma City, OK 73102 Purdue Pharma Inc. The Purdue Frederick Company Inc. Teva Pharmaceuticals USA, Robert G. McCampbell One Leadership Square Nicholas Merkley 15th Floor, 211 North Robinson Inc. Oklahoma City, OK 73102-7255 Cephalon, Inc. Watson Laboratories, Inc. Actavis LLC Actavis Pharma, Inc. f/k/a Watson Pharma, Inc.

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

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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>A. Shonn Brown</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 <u>7th</u> day of <u>December</u>, <u>2018</u>

10m Enner

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

# STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

December 10, 2018

Re: Andrea Meshonn Evans Brown, State Bar Number 24007164

To Whom It May Concern:

This is to certify that Andrea Meshonn Evans Brown was licensed to practice law in Texas on November 06, 1998, 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,

Keved-

Linda A. Acevedo Chief Disciplinary Counsel LA/web



P.O. BOX 12487, CAPITOL STATION, AUSTIN, TEXAS 78711-2487, 512.427.1350; FAX: 512.427.4167

### Exhibit B



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-ofstate 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: 2018-620
- 4. Applying Attorney: Andrea MeShonn Evans Brown 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.



eral Counsel L. Hendryx, Ge

Oklahoma Bar Association

Exhibit C