



IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel.,)
MIKE HUNTER,)
ATTORNEY GENERAL OF OKLAHOMA,)
)
Plaintiffs,)

Case No. CJ-2017-816

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 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.,)

STATE OF OKLAHOMA } S.S.
CLEVELAND COUNTY }
FILED
JAN 04 2019
In the office of the
Court Clerk MARILYN WILLIAMS


Defendants.

**NON-PARTY STEPHEN IVES' DEPOSITION DESIGNATIONS
UNDER THE PROTECTIVE ORDER.**

In accordance with the April 16, 2018, Amended Protective Order entered in this case, non-party Stephen A. Ives has designated his deposition testimony as Highly Confidential and Confidential in accordance with the attached spreadsheet.

Respectfully Submitted,

CONNER & WINTERS, LLP

A handwritten signature in black ink, appearing to read "J. D. Giddens", is written over a horizontal line. There are some additional scribbles to the right of the signature.

Jared D. Giddens, OBA #3355
1700 One Leadership Square
211 North Robinson
Oklahoma City, Oklahoma 73102-7101
405/ 272-5711 jgiddens@cwlaw.com

and

R. Richard Love, III, OBA # 14770
4000 One Williams Center
Tulsa, OK 74172-0148
918 / 586-5711
rlove@cwlaw.com

Attorneys for Non-Party Stephen A. Ives

**Confidentiality Designations
Deposition of Steve Ives**

Testimony	Confidentiality Category 1	Confidentiality Category 2	Confidentiality Category 3	Exh.
Nonconfidential				
Confidential				
Highly Confidential				
Testimony begins on page 7, line 8				
7:8-13				
7:14-17	Personal identity	Personnel or employment records		
7:18-24				
7:25 - 8:18	Personnel or employment records	Applicable laws and regulations	Research, development and commercial	
8:19-22	Applicable laws and regulations	Research, development and commercial		
8:23 - 10:4	Personnel or employment records	Applicable laws and regulations	Research, development and commercial	
10:5-14				
10:15 - 11:18	Personnel or employment records	Personal identity		
11:19 - 12:20	Applicable laws and regulations	Research, development and commercial		
12:21-24	Applicable laws and regulations	Research, development and commercial		
12:25 - 13:13	Applicable laws and regulations	Research, development and commercial	Trade secret	
13:14 - 14:22	Applicable laws and regulations			1
14:23 - 15:11	Personnel or employment records			
15:12 - 16:7	Research, development and commercial			
16:8 - 16:15	Research, development and commercial			
16:16 - 18:3	Research, development and commercial			
18:4-6	Personal identity			
18:7 - 19:13	Applicable laws and regulations			
19:14 - 20:6	Personal identity			
20:7 - 21:10	Research, development and commercial			
21:11 - 32:20	Applicable laws and regulations			
32:21 - 34:21	Personnel or employment records			
34:22 - 35:2	Applicable laws and regulations			
35:3 - 37:9	Applicable laws and regulations	Research, development and commercial	Personnel or employment records	2
37:10 - 42:18	Applicable laws and regulations	Personnel or employment records	Research, development and commercial	3
42:19 - 43:5	Research, development and commercial			
43:6 - 44:22	Personnel or employment records	Personal identity	Research, development and commercial	
44:23-45:13	Personal identity			

**Confidentiality Designations
Deposition of Steve Ives**

Testimony	Confidentiality Category 1	Confidentiality Category 2	Confidentiality Category 3	Exh.
45:14-20	Personal identity			
45:21 - 46:23	Personnel or employment records	Research, development and commercial		
46:24 - 48:1	Applicable laws and regulations	Research, development and commercial		
48:2 - 49:7	Research, development and commercial			
49:8 - 53:10	Applicable laws and regulations	Research, development and commercial		
53:11 - 59:14	Personnel or employment records	Applicable laws and regulations		
59:15 - 60:15	Applicable laws and regulations	Research, development and commercial		
60:16 - 61:23	Applicable laws and regulations	Research, development and commercial		
61:24 - 62:20	Personnel or employment records	Research, development and commercial		
62:21 - 65:7	Applicable laws and regulations	Personnel or employment records	Research, development and commercial	
65:8-23	Personnel or employment records	Research, development and commercial		
65:24 - 66:6	Applicable laws and regulations	Research, development and commercial	Personnel or employment records	
65:22 - 66:15	Applicable laws and regulations	Research, development and commercial		
66:16-23	Personnel or employment records	Research, development and commercial		
66:24 - 67:5				
67:6 - 67:17	Applicable laws and regulations	Research, development and commercial		
67:18-20	Applicable laws and regulations	Research, development and commercial		
67:21 - 69:9	Applicable laws and regulations	Research, development and commercial		
69:10-24	Applicable laws and regulations	Research, development and commercial		
69:25 - 74:15	Applicable laws and regulations	Research, development and commercial		
74:16 - 76:2	Applicable laws and regulations	Research, development and commercial		
76:3 - 76:18	Applicable laws and regulations	Research, development and commercial		
76:19 - 78:22	Applicable laws and regulations			
78:23 - 80:16	Applicable laws and regulations	Research, development and commercial		
80:17 - 81:11	Applicable laws and regulations	Research, development and commercial		
81:12-24	Applicable laws and regulations	Research, development and commercial		
81:25 - 82:3	Applicable laws and regulations	Research, development and commercial		
82:4-20	Applicable laws and regulations	Research, development and commercial		
82:21 - 85:4	Research, development and commercial			
85:5 - 85:19	Applicable laws and regulations	Research, development and commercial		
85:20 - 87:5	Applicable laws and regulations			
87:6 - 91:19	Applicable laws and regulations	Research, development and commercial		
91:20 - 94:19	Applicable laws and regulations	Research, development and commercial		4

**Confidentiality Designations
Deposition of Steve Ives**

Testimony	Confidentiality Category 1	Confidentiality Category 2	Confidentiality Category 3	Exh.
94:20 - 95:3	Applicable laws and regulations			
95:4-12	Applicable laws and regulations	Research, development and commercial		
95:13 - 97:19	Applicable laws and regulations	Personnel or employment records	Research, development and commercial	
97:20 - 100:5 100:6-9 100:10 - 102:25	Applicable laws and regulations			
103:1 - 125:13 125:14-17 125:18-20	Applicable laws and regulations	Research, development and commercial	Personnel or employment records	
125:21 - 132:8	Applicable laws and regulations	Research, development and commercial	Personnel or employment records	5
132:9 - 136:25	Applicable laws and regulations	Research, development and commercial		
137:1-20	Applicable laws and regulations	Research, development and commercial		
137:21 - 138:8	Applicable laws and regulations	Research, development and commercial		
138:9 - 139:3	Applicable laws and regulations	Research, development and commercial		
139:4-9	Applicable laws and regulations	Research, development and commercial		
139:10-20	Applicable laws and regulations	Research, development and commercial		
139:21 - 140:6	Applicable laws and regulations	Research, development and commercial	Personnel or employment records	
140:7 - 141:16	Applicable laws and regulations	Research, development and commercial		
141:17 - 143:24	Applicable laws and regulations	Research, development and commercial		
143:25 - 144:7	Personal identity			
144:8-10	Personnel or employment records			
144:11-15	Research, development and commercial	Personal identity		
144:16 - 146:14	Applicable laws and regulations	Research, development and commercial		
146:15 - 147:15	Applicable laws and regulations	Research, development and commercial		
147:16 - 148:18	Applicable laws and regulations	Research, development and commercial		
148:19 - 149:23	Applicable laws and regulations	Research, development and commercial	Personnel or employment records	
149:24 - 150:4	Applicable laws and regulations	Research, development and commercial		
150:5-9	Applicable laws and regulations	Research, development and commercial		
150:10 - 151:2	Research, development and commercial			
151:3-23	Applicable laws and regulations	Research, development and commercial		
151:24 - 152:6	Applicable laws and regulations	Research, development and commercial		
152:7 - 157:4	Applicable laws and regulations	Research, development and commercial		
157:5-21	Applicable laws and regulations	Research, development and commercial		

**Confidentiality Designations
Deposition of Steve Ives**

Testimony	Confidentiality Category 1	Confidentiality Category 2	Confidentiality Category 3	Exh.
157:22-23	Research, development and commercial			
157:24 - 158:5	Personal identity			
158:6-15	Applicable laws and regulations	Research, development and commercial		
158:16 - 159:20	Applicable laws and regulations	Research, development and commercial		
159:21 - 162:4	Applicable laws and regulations	Research, development and commercial		
162:5-22	Applicable laws and regulations	Research, development and commercial	Personnel or employment records	
162:23 - 163:23	Applicable laws and regulations	Research, development and commercial		4
163:24 - 164:7				
164:8 - 165:8	Applicable laws and regulations	Research, development and commercial		
165:9 - 167:9	Applicable laws and regulations	Research, development and commercial		
167:10 - 168:23	Applicable laws and regulations	Research, development and commercial		
168:24 - 169:18	Applicable laws and regulations	Research, development and commercial		
169:19 - 170:6	Applicable laws and regulations	Research, development and commercial		
170:7-13	Applicable laws and regulations	Research, development and commercial		
170:13-16	Applicable laws and regulations	Research, development and commercial		
170:17 - 171:2	Applicable laws and regulations	Research, development and commercial		
171:2-20	Applicable laws and regulations	Research, development and commercial		
171:21 - 172:19	Applicable laws and regulations	Research, development and commercial		
172:20 - 173:16	Applicable laws and regulations	Research, development and commercial		
173:17-24	Research, development and commercial	Personal identity		
173:25 - 177:17	Applicable laws and regulations	Research, development and commercial	Personal identity	
177:18 - 178:8	Applicable laws and regulations	Research, development and commercial		
178:9 - 178:20	Applicable laws and regulations	Research, development and commercial	Personnel or employment records	
178:21 - 179:14	Applicable laws and regulations	Research, development and commercial		
179:15 - 180:20	Applicable laws and regulations	Research, development and commercial		
180:21 - 181:10	Applicable laws and regulations	Research, development and commercial		
181:11-25	Applicable laws and regulations	Research, development and commercial		
182:1-24	Applicable laws and regulations	Research, development and commercial		
182:25 - 183:9	Applicable laws and regulations	Research, development and commercial		
183:10 - 184:9	Applicable laws and regulations	Research, development and commercial		
184:10 - 185:7	Applicable laws and regulations	Research, development and commercial	Personal identity	
185:8 - 188:8	Applicable laws and regulations	Research, development and commercial		
188:9 - 192:19	Applicable laws and regulations	Research, development and commercial		

**Confidentiality Designations
Deposition of Steve Ives**

Testimony	Confidentiality Category 1	Confidentiality Category 2	Confidentiality Category 3	Exh.
192:20 - 193:19	Applicable laws and regulations	Research, development and commercial		
193:20 - 196:21	Applicable laws and regulations	Research, development and commercial		
196:22 - 197:12	Applicable laws and regulations	Research, development and commercial		
197:13 - 199:6	Applicable laws and regulations	Research, development and commercial		
199:7-20				
199:21 - 202:17	Research, development and commercial	Personal identity		2
202:18 - 203:20	Research, development and commercial	Personnel or employment records		2
203:21 - 204:4	Applicable laws and regulations	Research, development and commercial		
204:5 - 212:12	Applicable laws and regulations	Personnel or employment records	Research, development and commercial	2
212:13 - 213:7	Applicable laws and regulations	Research, development and commercial		
213:8 - 214:4	Applicable laws and regulations	Research, development and commercial		
214:5 - 215:7	Applicable laws and regulations	Research, development and commercial		
215:8 - 216:24	Research, development and commercial			
216:25 - 218:19	Applicable laws and regulations	Research, development and commercial		
218:20 - 220:17	Applicable laws and regulations	Research, development and commercial		
220:18 - 223:8	Applicable laws and regulations	Research, development and commercial		
223:9-17				
223:18-22				
223:23 - 229:25	Research, development and commercial	Personnel or employment records		
230:1-2				
230:3 - 233:12	Research, development and commercial	Personnel or employment records	Personal identity	1
233:13 - 234:16	Research, development and commercial	Personnel or employment records	Personnel or employment records	
234:17 - 235:20	Research, development and commercial	Personal identity		
235:21 - 239:14	Research, development and commercial	Personal identity	Personnel or employment records	
239:15 - 242:5	Applicable laws and regulations	Research, development and commercial	Personnel or employment records	
242:6-19	Applicable laws and regulations	Research, development and commercial	Personnel or employment records	
242:20 - 243:17	Research, development and commercial	Personnel or employment records		
243:18-22	Personal identity			
243:23 - 245:4				
245:5-22	Personnel or employment records	Research, development and commercial		
245:23 - 250:9	Personnel or employment records	Personal identity	Research, development and commercial	
250:10-20	Personal identity			
250:21 - 253:6	Research, development and commercial	Personnel or employment records		

**Confidentiality Designations
Deposition of Steve Ives**

Testimony	Confidentiality Category 1	Confidentiality Category 2	Confidentiality Category 3	Exh.
253:7 - 256:17	Research, development and commercial			
256:18 - 258:2	Applicable laws and regulations	Research, development and commercial	Personal identity	
258:3-15	Research, development and commercial			
258:16 - 260:12	Applicable laws and regulations	Research, development and commercial		
260:13 - 261:14	Personal identity	Personnel or employment records	Research, development and commercial	
261:15 - 263:21	Applicable laws and regulations	Research, development and commercial		
263:22 - 264:5				
264:6 - 266:6	Applicable laws and regulations	Research, development and commercial		5
266:7 - 270:5	Applicable laws and regulations	Research, development and commercial		
270:6 - 274:3	Personal identity			
274:4-9	Research, development and commercial	Applicable laws and regulations		
274:10 - 278:21	Applicable laws and regulations	Research, development and commercial	Personnel or employment records	6
278:22 - 280:7	Applicable laws and regulations	Research, development and commercial		
280:8 - 281:4	Applicable laws and regulations	Research, development and commercial		
281:5-7	Applicable laws and regulations	Research, development and commercial	Trade secret	
281:8 - 282:8	Research, development and commercial			
282:9-22	Applicable laws and regulations			
282:23 - 284:20	Research, development and commercial			
284:21 - 286:2	Applicable laws and regulations			
286:3-10				
286:11 - 286:16	Applicable laws and regulations	Research, development and commercial		
286:17-21	Applicable laws and regulations	Research, development and commercial		
286:22 - 287:16	Applicable laws and regulations	Research, development and commercial	Personnel or employment records	
287:17 - 289:2	Applicable laws and regulations	Research, development and commercial		
289:3 - 9	Research, development and commercial			
289:10-23	Research, development and commercial			
289:24 - 290:14	Applicable laws and regulations	Research, development and commercial	Personnel or employment records	
290:15-16	Applicable laws and regulations			
290:17-23				

CERTIFICATE OF SERVICE

I hereby certify that on this 31 day of ~~October~~ ^{December} 2018, a true and correct copy of the within and foregoing document was emailed and mailed via first class mail, postage prepaid, addressed as follows:

Attorneys for Plaintiff

Michael Burrage
Reggie Whitten
WHITTEN BURRAGE
512 N. Broadway Avenue, Suite 300
Oklahoma City, OK 73102
mburrgae@whittenburrage.com
rwhitten@whittenburrage.com

Mike Hunter
ATTORNEY GENERAL FOR THE STATE OF
OKLAHOMA
Abby Dillsaver
GENERAL COUNSEL TO THE ATTORNEY
GENERAL
Ethan A. Shaner
DEPUTY GENERAL COUNSEL
313 N.E. 21st Street
Oklahoma City, OK 73105
abby.dillsaver@oag.ok.gov
ethan.shaner@oag.ok.gov

Bradley E. Beckworth
Jeffrey J. Angelovich
Trey Duck
Drew Pate
NIX, PATTERSON & ROACH, LLP
512 N. Broadway Avenue, Suite 200
Oklahoma City, OK 73102
bbeckworth@nixlaw.com
jangelovich@npraustin.com
tduck@nixlaw.com
dpate@nixlaw.com

Glenn Coffee
GLENN COFFEE & ASSOCIATES, PLLC
915 N. Robinson Ave.
Oklahoma City, OK 73102
gcoffee@glenncoffee.com

Tracy Schumacher
SCHUMACHER & Stanley, PLLC
114 East Main Street
Norman, OK 73072
tracy@schumacherstanley.com

Attorneys for Defendants Purdue Pharma, L.P. and The Purdue Frederick Company
Sanford C. Coats
Cullen D. Sweeney
CROWE & DUNLEVY, P.C.
Braniff Building
324 N. Robinson Ave., Ste. 100
Oklahoma City, OK 73102
Sandy.coats@crowdunlevy.com
Cullen.sweeney@crowedunlevy.com

Of Counsel:

Sheila Birnbaum
Mark S. Cheffo
Hayden A. Coleman
Paul A. LaFata
Jonathan S. Tam
DECHERT, LLP
Three Bryant Park
1095 Avenue of the Americas
New York, New York 10036
Sheila.birnbaum@dechert.com
mark.cheffo@dechert.com
hayden.coleman@dechert.com
paul.lafata@dechert.com
jonathan.tam@dechert.com

Patrick J. Fitzgerald
R. Ryan Stoll
SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP
155 North Wacker Drive, Suite 2700
Chicago, Illinois 60606
Patrick.fitzgerald@skadden.com
Ryan.stoll@skadden.com

Attorneys for Defendants Teva Pharmaceutical USA, Inc., Cephalon, Inc. Watson Laboratories, Inc., Actavis LLC and Actavis Pharma, Inc. F/K/A Watson Pharma, Inc.
Robert G. McCampbell
Travis J. Jett
GABLEGOTWALS
One Leadership Square, 15th Floor
211 North Robinson

Oklahoma City, OK 73102-7255
RMcCampbell@Gablelaw.com
TJett@Gablelaw.com

Of Counsel:

Steven A. Reed
Harvey Bartle IV
Jeremy A. Menkowitz
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103-2921
Steve.reed@morganlewis.com
Harvey.bartle@morganlewis.com
Jeremy.menkowitz@morganlewis.com

Brian M. Ercole
MORGAN, LEWIS & BOKCIUS LLP
200 S. Biscayne Blvd., Suite 5300
Miami, FL 33131
Brian.ercole@morganlewis.com

Benjamin H. Odom
John H. Sparks
ODOM, SPARKS & JONES PLLC
HiPoint Office Building
2500 McGee Drive, Ste. 140
Oklahoma City, OK 73072
Odomb@odomsparks.com
Sparksj@odomsparks.com

*Attorneys for Defendants Johnson & Johnson
Janssen Pharmaceuticals, Inc., Jansse
Pharmaceutica, Inc. N/K/A Jansse
Pharmaceutica, Inc. and Ortho-McNei
Janssen Pharmaceuticals, Inc. N/K/A Jansse
Pharmaceutica, Inc.*

And

Charles C. Lifland
O'MELVENY & MYERS LLP
400 S. Hope Street
Los Angeles, CA 90071
clifland@omm.com
Stephen D. Brody
O'MELVENY & MYERS LLP
1625 Eye Street NW
Washington, DC 20006
sbrody@omm.com



R. Richard Love, III