

STATE OF OKLA \* 104

# IN THE DISTRICT COURT OF CLEVELAND COUNTY STATE OF OKLAHOMA IAN 10 2019

)

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

In the office of the Court Clerk MARILYN WILLIAMS

Plaintiff,

Case No. CJ-2017-816

v.

PURDUE PHARMA L.P., et al.,

Defendants.

### **MOTION TO ASSOCIATE WILLIAM W. OXLEY 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 William W. Oxley 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), "Certificates of Good Standing" (Exhibit B), and the "Certificate of Compliance" from the Oklahoma Bar Association (Exhibit C).

DATED: January 10, 2019.

spectfully 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 e-mailed, this 10 day of January, 2019 to:

WHITTEN BURRAGE Michael Burrage Reggie Whitten 512 N. Broadway Avenue, Suite 300 Oklahoma City, OK 73102 mburrage@whittenburragelaw.com rwhitten@whittenburragelaw.com *Counsel for Plaintiff the State of Oklahoma* 

NIX, PATTERSON & ROACH, LLP Bradley E. Beckworth Jeffrey J. Angelovich Lloyd "Trey" Nolan Duck, III Andrew Pate Lisa Baldwin Nathan B. Hall 512 N. Broadway Ave., Suite 200 Oklahoma City, OK 73102 bbeckworth@nixlaw.com jangelovich@npraustin.com tduck@nixlaw.com dpate@nixlaw.com lbaldwin@nixlaw.com nhall@nixlaw.com Counsel for Plaintiff the State of Oklahoma

**ODOM, SPARKS & JONES PLLC** Benjamin H. Odom John H. Sparks Michael W. Ridgeway David L. Kinney **HiPoint Office Building** 2500 McGee Drive Ste. 140 Oklahoma City, OK 73072 odomb@odomsparks.com sparksj@odomsparks.com ridgewaym@odomsparks.com kinneyd@odomsparks.com Counsel for Defendants Janssen Pharmaceuticals, Inc., Johnson & Johnson, Janssen Pharmaceutica, Inc. n/k/a/ Janssen Pharmaceuticals, Inc., and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a/

OKLAHOMA OFFICE OF THE ATTORNEY GENERAL Mike Hunter Abby Dillsaver Ethan A. Shaner 313 NE 21st St Oklahoma City, OK 73105 abby.dillsaver@oag.ok.gov ethan.shaner@oag.ok.gov *Counsel for Plaintiff the State of Oklahoma* 

GLENN COFFEE & ASSOCIATES, PLLC Glenn Coffee 915 N. Robinson Ave. Oklahoma City, OK 73102 gcoffee@glenncoffee.com Counsel for Plaintiff the State of Oklahoma

FOLIART, HUFF, OTTAWAY & BOTTOM Larry D. Ottaway **Amy Sherry Fischer** 201 Robert S. Kerr Avenue, 12th Floor Oklahoma City, OK 73102 larryottaway@oklahomacounsel.com amyfischer@oklahomacounsel.com Attorneys for Defendants Johnson & Johnson, Janssen Pharmaceuticals, Inc., Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc., and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a/ Janssen Pharmaceuticals, Inc and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a/ Janssen Pharmaceuticals. Inc.

O'MELVENY & MYERS LLP Charles C. Lifland Jennifer D. Cardelús 400 S. Hope Street Los Angeles, CA 90071 clifland@omm.com jcardelus@omm.com *Counsel for Defendants Janssen*  Janssen Pharmaceuticals, Inc and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a/ Janssen Pharmaceuticals, Inc.

O'MELVENY & MYERS LLP Stephen D. Brody David K. Roberts 1625 Eye Street NW Washington, DC 20006 sbrody@omm.com droberts2@omm.com *Counsel for Defendants Janssen Pharmaceuticals, Inc., Johnson & Johnson, Janssen Pharmaceutica, Inc. n/k/a/ Janssen Pharmaceuticals, Inc., and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a/ Janssen Pharmaceuticals, Inc. and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a/ Janssen Pharmaceuticals, Inc.* 

### DECHERT, LLP

Sheila Birnbaum Mark S. Cheffo Havden A. Coleman Paul A. LaFata Jonathan S. Tam Erik Snapp 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 erik.snapp@dechert.com Counsel for Purdue Pharma L.P., Purdue Pharma Inc. and The Purdue Frederick Company Inc.

#### GABLEGOTWALS

Robert G. McCampbell Nicholas V. Merkley Ashley E. Quinn One Leadership Square, 15th Fl. 211 North Robinson Oklahoma City, OK 73102-7255 RMcCampbell@Gablelaw.com Pharmaceuticals, Inc., Johnson & Johnson, Janssen Pharmaceutica, Inc. n/k/a/ Janssen Pharmaceuticals, Inc., and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a/ Janssen Pharmaceuticals, Inc.

LYNN PINKER COX & HURST, LLP Eric Wolf Pinker John Thomas Cox III Lynn Pinker Cox & Hurst, LLP 2100 Ross Avenue, Suite 2700 Dallas, TX 75201 epinker@lynnllp.com tcox@lynnllp.com *Counsel for Purdue Pharma L.P., Purdue Pharma Inc. and The Purdue Frederick Company Inc.* 

MORGAN, LEWIS & BOCKIUS LLP Steven A. Reed Harvey Bartle IV Rebecca Hillyer Lindsey T. Mills 1701 Market Street Philadelphia, PA 19103-2921 steven.reed@morganlewis.com harvey.bartle@morganlewis.com rebeccahillyer@morganlewis.com lindsey.mills@morganlewis.com *Attorneys for Defendants Cephalon, Inc., Teva Pharmaceuticals USA, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc. f/k/a/ Watson Pharma, Inc.* 

MORGAN, LEWIS & BOCKIUS LLP Brian M. Ercole 200 S. Biscayne Blvd., Suite 5300 Miami, FL 33131 brian.ercole@morganlewis.com Attorneys for Defendants Cephalon, Inc., Teva Pharmaceuticals USA, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc. f/k/a/ Watson Pharma, Inc. NMerkley@Gablelaw.com AQuinn@Gablelaw.com Attorneys for Defendants Cephalon, Inc., Teva Pharmaceuticals USA, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc. f/k/a/ Watson Pharma, Inc.



 William
 W.
 Oxley
 Applicant, respectfully represents:

 First Name
 Middle Name
 Last Name

1. Applicant is an attorney at law and a member of the law firm of \_Dechert LLP\_

with its principal offices located at

U.S. Bank Tower, 633 West 5<sup>th</sup> Street, Suite 4900 Mailing Address

Los Angeles	Los Angeles	CA	, 90071	-2013
City	County	State	Zip Cod	e
(213) 808-5760	, (213) 8	08-5712	,	(213) 808-5760
Telephone (Firm)	Telephone	e (Applicant's D	irect Dial)	Fax (Applicant)

william.oxley@dechert.com. E-mail Address (Applicant)

If Applicant's office address is different from above,

please provide the following: \_

<u>City</u> <u>County</u> <u>State</u> <u>Zip Code</u> 2. Applicant is admitted to practice and is a member in good standing (statements attached) of the bar(s) of the highest court(s) of the following state(s):

<u>State</u>	Date of Admission		
California	12/07/1988		
New York	07/19/2018		
Texas	01/12/2006		

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:

# Exhibit A

Tribunal	Date of Admission
U.S.D.C. Central District of California	12/07/1988
U.S.D.C. Southern District of California	09/10/2014
U.S.D.C. Northern District of California	11/30/1993
U.S.D.C. Eastern District of California	01/06/1997
U.S.D.C. Eastern District of Texas	10/03/2007
Ninth Circuit Court of Appeals	11/22/1993

4. Applicant is not currently suspended or disbarred in any court except as hereinafter provided (Give particulars; e.g. court, jurisdiction, date): <u>No.</u>

5. 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): <u>No.</u>

6. 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): <u>No.</u>

7. 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 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! 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 who is counsel of record for Applicant in this matter is:

Sanford	С.	Coats	18268
First Name	Middle Name	Last Name	O.B.A. Number

324 N. Robinson Ave.	, Oklahoma City,	<u>OK, 7310</u>	2
Mailing Address	City	State Zip Code	9
(405) 235-7700	, (405) 2	39-6651	
Telephone Number	Fax Numb	er	
sandy.coats@crowedunlevy	.com		
E-mail Address			
10. The following accurately	represents the na	ames of eac	h party in this matter
and the names and address	ses of each couns	el of record	who appear for that
party:			
Party Name Co	ounsel Name		Address of Counsel
Please see addendum			
		•	
	non the second		

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>William W. Oxley</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>3rd</u>	_ day of _J	anuary	<u>, 2019</u>	
		$\bigvee$	$\frown$	
		Applica	Ht \	

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 William W.

## <u>Oxley</u>

• .

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

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 10

1

. 1

• • • •



# Supreme Court of California

JORGE E. NAVARRETE Clerk and Executive Officer of the Supreme Court

# **CERTIFICATE OF THE CLERK OF THE SUPREME COURT**

## OF THE

# **STATE OF CALIFORNIA**

# WILLIAM WAYNE OXLEY

I, JORGE E. NAVARRETE, Clerk/Executive Officer of the Supreme Court of the State of California, do hereby certify that WILLIAM WAYNE OXLEY, #136793, was on the 7th day of December 1988, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.

Witness my hand and the seal of the court on the 28th day of December 2018.

JORGE E. NAVARRETE Clerk/Executive Officer of the Supreme Court

By: Senior Deputy

Exhibit **B** 



State of New York Supreme Court, Appellate Division Third Judicial Department

**I, Robert D. Mayberger,** Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that

# William Wayne Oxley

having taken and subscribed the Constitutional Oath of Office as prescribed by law, was duly licensed and admitted to practice by this Court as an Attorney and Counselor at Baw in all courts of the State of New York on the **19th day of July, 2018**, is currently in good standing and is registered with the Administrative Office of the Courts as required by section four hundred sixtyeight-a of the Judiciary Baw.



In Witness Whereof, I have hereunto set my hand and affixed the Seal of said Court, at the City of Albany, this **31st day of December, 2018**.

Robert D Maybingen

Clerk

# The Supreme Court of Texas

AUSTIN

**CLERK'S OFFICE** 

I, BLAKE HAWTHORNE, Clerk of the Supreme Court of Texas, certify that the records of this office show that

### William Wayne Oxley

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 12th day of January, 2006.

I further certify that the records of this office show that, as of this date

## William Wayne Oxley

is presently enrolled with the State Bar of Texas as an active member in good standing.



No. 8477C.1

IN TESTIMONY WHEREOF witness my signature

and the seal of the Supreme Court of Texas at the City of Austin, this, the 28th day of December, 2018.

**BLAKE HAWTHORNE, Clerk** 

Clerk, Supreme Court of Texas



# 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: January 8, 2019
- 3. Application Number: 2019-12
- 4. Applying Attorney: William W. Oxley Dechert LLP 633 West 5<sup>th</sup> street, Suite 4900 Los Angeles, CA 90071
- 5. The Application was: **GRANTED**

Dated this 9th day of January, 2019.



Gina L. Hendryx, General Counsel Oklahoma Bar Association

Exhibit C