

**FILED**

**JAN 10 2019**

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

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

Plaintiff, )

v. )

PURDUE PHARMA L.P., *et al.*, )

Defendants. )

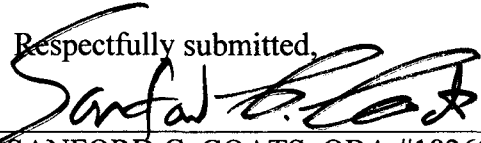
In the office of the  
Court Clerk MARILYN WILLIAMS

Case No. CJ-2017-816

**MOTION TO ASSOCIATE WILL W. SACHSE 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 Will W. Sachse 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 10, 2019.

Respectfully submitted,  
  
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**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:

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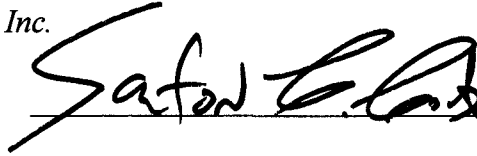
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Laboratories, Inc., Actavis LLC, and Actavis  
Pharma, Inc. f/k/a/ Watson Pharma, Inc.*



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# APPLICATION

## OUT OF STATE ATTORNEY REGISTRATION

**APPROVED**



Will W. Sachse, 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

Cira Centre, 2929 Arch Street  
Mailing Address

Philadelphia Philadelphia PA, 19104-2808,  
City County State Zip Code  
(215) 994-4000, (215) 994-2496, (215) 655-2496  
Telephone (Firm) Telephone (Applicant's Direct Dial) Fax (Applicant)

will.sachse@dechert.com.  
E-mail Address (Applicant)

If Applicant's office address is different from above,

please provide the following: \_\_\_\_\_  
Mailing Address  
\_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_  
City County State Zip Code

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>	<u>Date of Admission</u>
<u>Pennsylvania</u>	<u>10/29/1999</u>

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

<u>United States Court of Appeals for the Second Circuit</u>	<u>May 28, 2015</u>
<u>United States Court of Appeals for the Third Circuit</u>	<u>May 21, 2001</u>
<u>United States Court of Appeals for the Tenth Circuit</u>	<u>January 20, 2004</u>
<u>United States District Court, Eastern District of Pennsylvania</u>	<u>December 21, 1999</u>
<u>United States District Court, Middle District of Pennsylvania</u>	<u>April 3, 2012</u>

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

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): No.

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): No.

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:

<u>Sanford</u>	<u>C.</u>	<u>Coats</u>	<u>18268</u>
First Name	Middle Name	Last Name	O.B.A. Number

324 N. Robinson Ave., Oklahoma City, OK, 73102  
Mailing Address City State Zip Code

(405) 235-7700, (405) 239-6651  
Telephone Number Fax Number

sandy.coats@crowedunlevy.com  
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:

<u>Party Name</u>	<u>Counsel Name</u>	<u>Address of Counsel</u>
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Please see addendum  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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, Will W. Sachse, 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 2 day of January 2019.

  
\_\_\_\_\_  
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



**ADDENDUM to the Out of State Attorney Registration Application of Will W. Sachse**

**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:**

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

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



Supreme Court of Pennsylvania

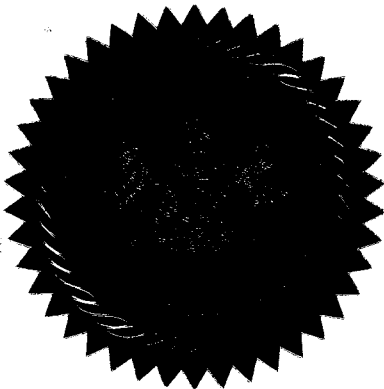
**CERTIFICATE OF GOOD STANDING**

***Friedrich Wilhelm W. Sachse, Esq.***

**DATE OF ADMISSION**

***October 29, 1999***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal**

**Dated: January 4, 2019**

A handwritten signature in black ink, reading "Patricia A. Johnson".

---

Patricia A. Johnson  
Chief Clerk



## 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: **January 8, 2019**
3. Application Number: **2019-10**
4. Applying Attorney: **Will W. Sachse  
Dechert LLP  
2929 Arch Street  
Philadelphia, PA 19104**
5. The Application was: **GRANTED**

Dated this 9th day of January, 2019.



Gina L. Hendryx, General Counsel  
Oklahoma Bar Association