



IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

FILED

JAN 10 2019

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 RUSSELL GUY HERMAN 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 Russell Guy Herman 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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Laboratories, Inc., Actavis LLC, and Actavis
Pharma, Inc. f/k/a/ Watson Pharma, Inc.*



A handwritten signature in black ink, appearing to read "Satal G. Goot", is written over a horizontal line. The signature is stylized and cursive.

APPLICATION



OUT OF STATE ATTORNEY REGISTRATION

Russell Guy Herman, Applicant, respectfully represents:
First Name Middle Name Last Name

1. Applicant is an attorney at law and a member of the law firm of Lynn Pinker
Cox & Hurst, LLP ("LPCH")

with its principal offices located at 2100 Ross Avenue, Suite 2700

Dallas, Dallas, TX, 75201
City County State Zip Code
(214) 981-3800, (214) 981-3819, (214) 981-3839
Telephone (Firm) Telephone (Applicant's Direct Dial) Fax (Applicant)

rherman@lynnllp.com. If Applicant's office address is different from above,
E-mail Address (Applicant)

please provide the following: _____
Mailing Address

_____, _____, _____, _____
City County State Zip Code

2. Applicant is admitted to practice and is a member in good standing
(certificates of good standing attached) of the bar(s) of the highest state court(s)
of the following state(s):

<u>State</u>	<u>Date of Admission</u>
Texas	11/2/2012

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:

<u>Tribunal</u>	<u>Date of Admission</u>
Eastern	03/2016
Northern	08/2015

Southern

11/2014

Western

03/2016

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

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!** State of Oklahoma, ex rel., 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. Number

324 N. Robinson Avenue, Suite 100, Oklahoma City, OK, 73102,
 Mailing Address City State 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. Purdue Pharma Inc. The Purdue Frederick Company Inc.	Sanford C. Coats Joshua D. Burns	324 N. Robinson Avenue, Suite 100 Oklahoma City, OK 73102

<p>Teva Pharmaceuticals USA, Inc.</p> <p>Cephalon, Inc.</p> <p>Watson Laboratories, Inc.</p> <p>Actavis LLC</p> <p>Actavis Pharma, Inc. f/k/a Watson Pharma, Inc.</p>	<p>Robert G. McCampbell Nicholas Merkley</p>	<p>One Leadership Square 15th Floor, 211 North Robinson Oklahoma City, OK 73102-7255</p>
<p>Johnson & Johnson</p> <p>Janssen Pharmaceuticals, Inc.</p> <p>Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc.</p> <p>Janssen Phannaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc.</p>	<p>Benjamin H. Odom John Sparks</p>	<p>HiPoint Office Building 2500 McGee Drive Suite 140 Oklahoma City, OK 73072</p>
<p>Johnson & Johnson</p> <p>Janssen Pharmaceuticals, Inc.</p> <p>Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc.</p> <p>Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc.</p>	<p>Larry D. Ottaway Amy Sherry Fischer</p>	<p>201 Robert S. Kerr Avenue 12th Floor Oklahoma City, OK 73102</p>
<p>State of Oklahoma, ex rel., Mike Hunter, Attorney General of Oklahoma</p>	<p>Michael Burrage Reggie Whitten</p>	<p>512 N. Broadway Avenue Suite 300 Oklahoma City, OK 73102</p>
	<p>Mike Hunter Abby Dillsaver Ethan A. Shaner</p>	<p>313 N.E. 21st Street, Oklahoma City, OK 73105</p>
	<p>Bradley E. Beckworth Jeffrey J. Angelovich</p>	<p>512 N. Broadway Avenue Suite 200 Oklahoma City, OK 73102</p>
	<p>Glenn Coffee</p>	<p>915 N. Robinson Avenue Oklahoma City, OK 73102</p>

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.

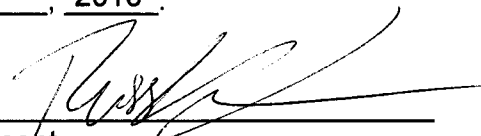
13. Applicant has disclosed in writing to the client that the Applicant is not admitted to practice in this jurisdiction and the client has consented to such representation.

I, Russell Guy Herman, 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 28th day of December, 2018.



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

STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

December 28, 2018

Re: Russell Guy Herman, State Bar Number 24083169

To Whom It May Concern:

This is to certify that Russell Guy Herman was licensed to practice law in Texas on November 02, 2012, 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,

A handwritten signature in black ink, appearing to read "L. Acevedo", with a stylized flourish at the end.

Linda A. Acevedo
Chief Disciplinary Counsel
LA/web





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: **2019-15**
4. Applying Attorney: **Russell Guy Herman
Lynn Pinker Cox & Hurst, LLP
2100 Ross Avenue, Suite 2700
Dallas, TX 75201**
5. The Application was: **GRANTED**

Dated this 9th day of January, 2019.



Gina L. Hendryx, General Counsel
Oklahoma Bar Association