

STATE OF OKLAHOMA STATE OF OKLAHOMA STATE OF OKLAHOMA FILED

| STATE OF OKLAHOMA, ex rel., MIKE HUNTER, ATTORNEY GENERAL OF OKLAHOMA, |) | JAN 10 2019 |
|--|---|--|
| Plaintiff, |) | In the office of the Court Clerk MARILYN WILLIAMS Case No. CJ-2017-816 |
| v. |) | Case No. CJ-2017-816 |
| PURDUE PHARMA L.P., et al., |) | |
| Defendants |) | |

MOTION TO ASSOCIATE RUBEN A. GARCIA 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 Ruben A. Garcia 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 <u>/0</u>, 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 /0 day of January, 2019 to:

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Janssen Pharmaceuticals, Inc. n/k/a/

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| Ruben | A | Garcia | _, Applicant, re: | spectfully | represents: |
|-------------------------------|--|--------------------------------------|------------------------------------|----------------------|----------------|
| First Name | Middle Name | Last Name | | | • |
| 1. Applicant | is an attorney a | nt law and a me | mber of the lav | v firm of | Lynn Pinker |
| Cox & Hurst | LLP ("LPCH") | | | | |
| with its princ | cipal offices locat | ted at <u>2100 F</u> | Ross Avenue, S | Suite 2700 | |
| Dallas | • | , _Dallas | Mailing Address ,TX, | 75201 | |
| ci (214) 981-3 | ity BOO (2 | County 214) 292-3648 | State (214) | Zip Code 981-3839 | |
| Telephone | e (Firm) Te | elephone (Applicant's Di | rect Dial) Fax (App | olicant) | |
| rgarcia@lyn | nllp.com | If Applicant's o | ffice address is | different | from above |
| E-mail Address (A | pplicant) | фрсас | | | , |
| please provi | de the following: | | | | |
| | | | Mailing Address | | |
| Ci | ity , | County | State | Zip Coo | le |
| 2. Applica | nt is admitted | to practice an | d is a memb | per in ac | od standing |
| | | • | | _ | • |
| (certificates | of good standing | g attached) of th | ne bar(s) of the | highest s | state court(s) |
| of the follow | ing state(s): | | | | |
| <u>State</u> | | | <u>Date</u> | of Admis | sio <u>n</u> |
| Texas | | | 1 | 1/2016 | |
| D.C. | | | C | 2/2018 | |
| | | | | | |
| Courts, Unite States, and/ | nt is admitted to ed States Circui or other tribunal good standing of | t Courts of Appe s on the dates i | eal, the Supren ndicated for ea | ne Court (| of the United |
| <u>Tribur</u> | <u>nal</u> | | <u>Date</u> | of Admis | <u>sion</u> |
| Eastern D | District of Texas | | 12 | /12/2018 | |

| 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_ | 182 | 68 | |
|------------------------------------|-----------------------|-------------------------|-------------|-------------------|---|
| First Name | Middle Name | Last Name | O.B.A. | Number | |
| 324 N. Robinsor Mailing Address | Avenue, Suite 100 | , Oklahoma City City | Y, OK State | 73102 Zip Code | , |
| (405) 235-7700 Telephone Number | , <u>(405) 239-66</u> | | ats@crow | edunlevy.com | |

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. | Sanford C. Coats Joshua D. Burns | 324 N. Robinson Avenue, Suite 100 Oklahoma City, OK 73102 |
| Purdue Pharma Inc. | boorida B. Barrio | Ordinoma Orty, Ort 70702 |
| The Purdue Frederick Company Inc. | | |

| Teva Pharmaceuticals USA, Inc. Cephalon, Inc. Watson Laboratories, Inc. Actavis LLC Actavis Pharma, Inc. f/k/a Watson Pharma, Inc. | Robert G. McCampbell Nicholas Merkley | One Leadership Square 15th Floor, 211 North Robinson Oklahoma City, OK 73102-7255 |
|---|--|---|
| Johnson & Johnson Janssen Pharmaceuticals, Inc. Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc. Janssen Pharnaceutica, 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 th 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 |

: :

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.

Ruben A. Garcia

_____, 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 27th day of ____ December ___

u d. Com

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 200B

STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

December 10, 2018

Re: Ruben Alan Garcia, State Bar Number 24101787

To Whom It May Concern:

This is to certify that Ruben Alan Garcia was licensed to practice law in Texas on November 04, 2016, 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,

Linda A. Acevedo Chief Disciplinary Counsel

LA/web



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

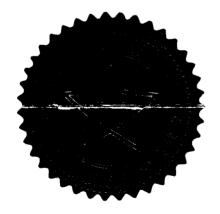
Ruben Alan Garcia

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 4th day of November, 2016.

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

Ruben Alan Garcia

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



No. 4657C.1

IN TESTIMONY WHEREOF witness my signature

and the seal of the Supreme Court of
Texas at the City of Austin, this, the
10th day of December, 2018.
BLAKE HAWTHORNE, Clerk

Blake A. Huuseline

Clerk, Supreme Court of Texas



On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, the District of Columbia Bar does hereby certify that

Ruben Slan Garcia

was duly qualified and admitted on **February 5, 2018** as an attorney and counselor entitled to practice before this Court; and is, on the date indicated below, an **Active** member in good standing of this Bar.

In Testimony Whereof,
I have hereunto subscribed my
name and affixed the seal of this
Court at the City of Washington,
D.C., on December 13, 2018.

JULIO A. CASTILLO
Clerk of the Court

Issued By:

District of Columbia Bar Membership

For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email memberservices@dcbar.org.



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: 2019-14
- 4. Applying Attorney: Ruben A. Garcia

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