

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

STATE OF OKLAHOMA, ex rel., MIKE HUNTER,

ATTORNEY GENERAL OF OKLAHOMA.

Court Clark MARILLYN WILLIAMS

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

JAN 2 2 2019

Plaintiff,

VS.

(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.,

Defendants.

Case No. CJ-2017-816

The Honorable Thad Balkman

#### **MOTION TO ASSOCIATE COUNSEL**

Plaintiff, State of Oklahoma ex rel., Mike Hunter, Attorney General of Oklahoma, hereby moves the Court for an Order permitting Cody Hill 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(s) of Good Standing (Exhibit B), and the "Certificate of Compliance" from the Oklahoma Bar Association (Exhibit C).

DATED: January 22, 2019

### Submitted by:

Michael Burrage, OBA No. 1350 Reggie Whitten, OBA No. 9576 J. Revell Parish, OBA No. 30205

WHITTEN BURRAGE

512 N. Broadway Avenue, Suite 300

Oklahoma City, OK 73102 Telephone: (405) 516-7800

Facsimile:

(405) 516-7859

Emails:

mburrage@whittenburragelaw.com rwhitten@whittenburragelaw.com rparish@whittenburragelaw.com

Bradley E. Beckworth, OBA No. 19982 Jeffrey J. Angelovich, OBA No. 19981

Lisa Baldwin, OBA No. 32947 Trey Duck, OBA No. 33347

Drew Pate, pro hac vice

Brooke A. Churchman, OBA No. 31946

Nathan B. Hall, OBA No. 32790

NIX, PATTERSON, LLP

512 N. Broadway Avenue, Suite 200

Oklahoma City, OK 73102 Telephone: (405) 516-7800 Facsimile: (405) 516-7859

Emails:

nhall@nixlaw.com

bbeckworth@nixlaw.com jangelovich@nixlaw.com lbaldwin@nixlaw.com tduck@nixlaw.com dpate@nixlaw.com

bchurchman@nixlaw.com

Mike Hunter, OBA No. 4503 ATTORNEY GENERAL FOR THE STATE OF OKLAHOMA Abby Dillsaver, OBA No. 20675 GENERAL COUNSEL TO

THE ATTORNEY GENERAL Ethan A. Shaner, OBA No. 30916 DEPUTY GENERAL COUNSEL

313 N.E. 21st Street

Oklahoma City, OK 73105 Telephone: (405) 521-3921 Facsimile: (405) 521-6246

Emails:

abby.dillsaver@oag.ok.gov

ethan.shaner@oag.ok.gov

Glenn Coffee, OBA No. 14563 GLENN COFFEE & ASSOCIATES, PLLC 915 N. Robinson Ave. Oklahoma City, OK 73102 Telephone: (405) 601-1616

Email:

gcoffee@glenncoffee.com

### ATTORNEYS FOR PLAINTIFF

#### **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the above and foregoing was emailed on January 22, 2019 to:

Sanford C. Coats Joshua D. Burns CROWE & DUNLEVY, P.C. Braniff Building 324 N. Robinson Ave., Ste. 100 Oklahoma City, OK 73102

Sheila Birnbaum
Mark S. Cheffo
Hayden A. Coleman
Paul A. LaFata
Marina L. Schwarz
Lindsay Zanello
Erik Snapp
DECHERT LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036

Jonathan S. Tam
Jae Hong Lee
DECHERT LLP
One Bush Drive, Suite 1600
San Francisco, CA 94104

Benjamin Franklin McAnaney DECHERT LLP 2929 Arch Street Philadelphia, PA 19104

Britta Erin Stanton
John D. Volney
John Thomas Cox III
Eric Wolf Pinker
Jervonne Denise Newsome
Jared Daniel Eisenberg
John Thomas Cox III
LYNN PINKER COX & HURST LLP
2100 Ross Avenue, Suite 2700
Dallas, TX 75201

Robert S. Hoff WIGGIN AND DANA LLP 265 Church Street New Haven, CT 06510

Benjamin H. Odom John H. Sparks Michael W. Ridgeway David L. Kinney ODOM, SPARKS & JONES PLLC HiPoint Office Building 2500 McGee Drive Ste. 140 Norman, OK 73072

Larry D. Ottaway Amy Sherry Fischer FOLIART, HUFF, OTTAWAY & BOTTOM 201 Robert S. Kerr Avenue, 12<sup>th</sup> Floor Oklahoma City, OK 73102

Stephen D. Brody David K. Roberts O'MELVENY & MYERS LLP 1625 Eye Street NW Washington, DC 20006

Charles C. Lifland
Jennifer D. Cardelus
Wallace M. Allan
Sabrina H. Strong
Esteban Rodriguez
Houman Ehsan
O'MELVENY & MYERS LLP
400 S. Hope Street
Los Angeles, CA 90071

Jeffrey Barker O'MELVENY & MYERS LLP 610 Newport Center Drive Newport Beach, CA 92660

Daniel J. Franklin Ross Galin Desirae Krislie Cubero Tongco O'MELVENY & MYERS LLP 7 Times Square New York, NY 10036

Amy Riley Lucas O'MELVENY & MYERS LLP 1999 Avenue of the Stars, 8<sup>th</sup> Floor Los Angeles, California 9006

Robert G. McCampbell Travis J. Jett Nicholas V. Merkley Ashley E. Quinn GABLEGOTWALS One Leadership Square, 15th Floor 211 North Robinson Oklahoma City, OK 73102-7255 Brian M. Ercole MORGAN, LEWIS & BOCKIUS LLP 200 S. Biscayne Blvd., Suite 5300 Miami, FL 33131

Steven A. Reed Harvey Bartle IV Jeremy A. Menkowitz MORGAN, LEWIS & BOCKIUS LLP 1701 Market Street Philadelphia, PA 19103-2921

Mark A. Fiore MORGAN, LEWIS & BOCKIUS LLP 502 Carnegie Center Princeton, NJ 08540

Michael Burrage

# EXHIBIT A





### Cody , Applicant, respectfully represents: First Name 1. Applicant is an attorney at law and a member of the law firm of Nix Patterson, LLP with its principal offices located at 3600 N Capital of Texas Highway, Suite B350 Austin Zip Code City 512 328 - 5333 512) 328-5335 Telephone (Applicant's Direct Dial) Telephone (Firm) codyhill@nixlaw.com If Applicant's office address is different from above, E-mail Address (Applicant) please provide the following: \_\_ City 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> **Date of Admission Texas** 9/27/16 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 US District Court, Eastern District of Texas 9/4/18 9/25/18 US District Court, Eastern District of Oklahoma 3/13/18 US District Court, Western District of Oklahoma

US District Court, District of Colorado  4. Have you ever been suspended or disbarred in any hereinafter provided (Give particulars; e.g. court, jurisd provided)  5. Are you currently subject to any pending disciplinary organization with authority to discipline attorneys at law provided (Give particulars; e.g. court, discipline authority suspension or disbarment, by any organization with authorneys at law except as hereinafter provided (Give particulars, type of discipline, date, status):	but not limited to, uthority to discipline particulars; e.g. court,
5. Are you currently subject to any pending disciplinar organization with authority to discipline attorneys at law provided (Give particulars; e.g. court, discipline authority suspension or disbarment, by any organization with au attorneys at law except as hereinafter provided (Give particulars);	but not limited to, uthority to discipline particulars; e.g. court,
organization with authority to discipline attorneys at law provided (Give particulars; e.g. court, discipline authority).  6. Have you ever received public discipline including, suspension or disbarment, by any organization with au attorneys at law except as hereinafter provided (Give provided including).	w except as hereinafter not limited to, uthority to discipline particulars; e.g. court,
suspension or disbarment, by any organization with au attorneys at law except as hereinafter provided (Give p discipline authority, type of discipline, date, status):	uthority to discipline particulars; e.g. court,
7. Have you ever had any certificate or privilege to apparent any regulatory or administrative body suspended or reperinafter provided (Give particulars; e.g. administration suspension or reinstatement):  No	voked except as
8. Applicant seeks admission to practice in the \$ following matter (give particulars; e.g. caption of case	
matter, party to be represented): Note - A separa	
submitted for each matter in which the appl	licant seeks admissio
State of Oklahoma, ex rel., Mike Hunter, Attorney General of Okl	klahoma v. Purdue Pharma , e
District Court of Cleveland County; Case No. CJ-2017-816; Fals	se Claims/Public Nuisance/Fra

9. The Oklaho Applicant in this r Michael		ation member w	ho is co 135		record for
First Name	Middle Name	Last Name	O.B./	A. Number	•
512 N. Broadway Av		Oklahoma City ,	OK ,	73102 Zip Code	,
(405) 516-7800 Telephone Num	, ( 405	5) 916-7859 Fax Number		urrage@wh E-mail Addres	nittenburrage.com
		resents the name			
and the names a	and addresses o	f each counsel o	f record	who appe	ear for that
party:					
Party Name	Couns	el Name		<u>Address</u>	of Counsel
Please see atta	ched sheet.				
				<u></u>	
		· · · · · · · · · · · · · · · · · · ·			
		·		\ \ \	

- 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.

under penalty of perjury that the assertions of this application are true:			
I, Cody I	Hill	, do hereby swear/affirm	
representation.			
admitted to prac	ctice in this jurisdiction and	the client has consented to such	
13. Applicant h	nas disclosed in writing to t	he client that the Applicant is no	

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 7th 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

Form 200B

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:

Attorney	Represented Parties
Angelovich, Jeffrey J (Bar #19981) 512 N BROADWAY AVE STE 200 OKLAHOMA CITY, OK 73102	OKLAHOMA STATE OF ex rel ATTORNEY GENERAL OF OKLAHOMA,
Baldwin, Lisa (Bar #32947) Nix, Patterson & Roach, LLP 512 North Broadway Avenue, Suite 200 Oklahoma City, OK 73102	OKLAHOMA STATE OF ex rel ATTORNEY GENERAL OF OKLAHOMA,
Beckworth, Bradley E (Bar #19982) 512 N BROADWAY AVE STE 200 OKLAHOMA CITY, OK 73102	OKLAHOMA STATE OF ex rel ATTORNEY GENERAL OF OKLAHOMA,
Burns, Joshua D (Bar #32967) CROWE & DUNLEVY P.C. BRANIFF BUILDING 324 NORTH ROBINSON AVE., STE 100 OKLAHOMA CITY, OK 73102	Purdue Pharma L P, Purdue Pharma Inc, Purdue Frederick Company,
Burrage, Michael (Bar #1350) 512 N BROADWAY AVE STE 300 OKLAHOMA CITY, OK 73102	OKLAHOMA STATE OF ex rel ATTORNEY GENERAL OF OKLAHOMA,
Cheffo, Mark Steven EMANUEL URQUHART & SULLIVAN LLP 51 MADISON AVENUE, 22ND FLOOR NEW YORK, NY 10010	Purdue Frederick Company, Purdue Pharma Inc, Purdue Pharma L P,
Churchman, Brooke A (Bar #31946) NIX PATTERSON LLP 512 N BROADWAY STE 200 okc, OK 73102	OKLAHOMA STATE OF ex rel ATTORNEY GENERAL OF OKLAHOMA,

#### **Attorney**

Coats, Sanford C (Bar #18268) CROWE & DUNLEVY P.C. 324 NORTH ROBINSON AVE. SUITE 100 BRANIFF BUILDING OKLAHOMA CITY, OK 73102

#### **Represented Parties**

Purdue Frederick Company, Purdue Pharma Inc, Purdue Pharma L P,

Coffee, Glenn (Bar #14563) 915 N ROBINSON AVE OKLAHOMA CITY, OK 73102 OKLAHOMA STATE OF ex rel ATTORNEY GENERAL OF OKLAHOMA,

Dillsaver, Abby (Bar #20675) 313 NE 21ST STREET OKLAHOMA CITY, OK 73105 OKLAHOMA STATE OF ex rel ATTORNEY GENERAL OF OKLAHOMA,

Duck, Lloyd Nolan lii (Bar #33347) 512 NORTH BROADWAY AVE STE 200 OKLAHOMA CITY, OK 73102 OKLAHOMA STATE OF ex rel ATTORNEY GENERAL OF OKLAHOMA.

FISCHER, AMY SHERRY (Bar #16651) 201 ROBERT S. KERR AVENUE, 12th FLOOR OKLAHOMA CITY, OK 73102 Janssen Pharmaceuticals Inc, Janssen Pharmaceutica Inc,

Hunter, Mike (Bar #4503) 313 NE 21ST STREET OKLAHOMA CITY, OK 73105 OKLAHOMA STATE OF ex rel ATTORNEY GENERAL OF OKLAHOMA,

Kinney, David L (Bar #10875)
ODOM SPARKS & JONES PLLC
HIPOINT OFFICE BUILDING
2500 MCGEE DRIVE STE 140
NORMAN, OK 73072

Ortho McNeil Janssen Pharmaceuticals Inc, Janssen Pharmaceuticals Inc, Janssen Pharmaceutica Inc, Johnson & Johnson,

MERKLEY, NICHOLAS V (Bar #20284) GABLEGOTWALS ONE LEADERSHIP SQUARE 15TH FLOOR OKLAHOMA CITY, OK 73102 TEVA Pharmaceuticals USA Inc, Cephalon Inc, Watson Laboratories Inc, Actavis LLC, Actavis Pharma Inc,

ODOM, BENJAMIN H (Bar #10917) 2500 SOUTH MCGEE DRIVE SUITE 140 NORMAN, OK 73072 Ortho McNeil Janssen Pharmaceuticals Inc, Janssen Pharmaceutica Inc, Janssen Pharmaceuticals Inc, Johnson & Johnson,

#### **Attorney**

OTTAWAY, LARRY D (Bar #6816) 201 ROBERT S. KERR AVE 12TH FLOOR OKLAHOMA CITY, OK 73102

Parrish, J Revell (Bar #30205) 512 N BROADWAY AVE STE 300 OKLAHOMA CITY, OK 73102

Quinn, Ashley E (Bar #33251) GableGotwals One Leadership Square, 15th Floor 211 N Robinson Ave Oklahoma City, OK 73102

Ridgeway, Michael W (Bar #15657) 2500 MCGEE DR SUITE 140 ODOM, SPARKS & JONES, PLLC NORMAN, OK 73072

Schumacher, Tracy (Bar #15950) SCHUMACHER & STANLEY PLLC 114 E MAIN STREET NORMAN, OK 73072

Shaner, Ethan A (Bar #30916) 313 NE 21ST STREET OKLAHOMA CITY, OK 73105

Sweeney, Cullen Dean (Bar #30269) 324 NORTH ROBINSON AVE. SUITE 100 OKC, OK 73102

Whitten, Reggie (Bar #9576) 512 N BROADWAY AVE STE 300 OKLAHOMA CITY, OK 73102

#### **Represented Parties**

Ortho McNeil Janssen Pharmaceuticals Inc, Johnson & Johnson,

OKLAHOMA STATE OF ex rel ATTORNEY GENERAL OF OKLAHOMA,

Cephalon Inc, TEVA Pharmaceuticals USA Inc, Watson Laboratories Inc, Actavis LLC, Actavis Pharma Inc,

Janssen Pharmaceutica Inc, Ortho McNeil Janssen Pharmaceuticals Inc, Johnson & Johnson,

OKLAHOMA STATE OF ex rel ATTORNEY GENERAL OF OKLAHOMA,

OKLAHOMA STATE OF ex rel ATTORNEY GENERAL OF OKLAHOMA,

Purdue Frederick Company, Purdue Pharma Inc, Purdue Pharma L P,

OKLAHOMA STATE OF ex rel ATTORNEY GENERAL OF OKLAHOMA,

# EXHIBIT B

## STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

January 07, 2019

Re: Cody Lee Hill, State Bar Number 24095836

To Whom It May Concern:

This is to certify that Cody Lee Hill was licensed to practice law in Texas on September 16, 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



# EXHIBIT C



## 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 11, 2019
- 3. Application Number: 2019-21
- 4. Applying Attorney: Cody Hill

Nix Patterson, LLP

3600 N. Capital of Texas Highway, Suite B350

**Austin, TX 78746** 

5. The Application was: **GRANTED** 

Dated this 11th day of January, 2019.

Gina L. Hendryx, General Counsel Oklahoma Bar Association