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OKLAHOMA } S.S.
CLEVELAND COUNTY }
FILED
MAR 22 2019

IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA, *ex rel.*, Mike Hunter,
Attorney General,

Plaintiff,

v.

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

Defendants.

For Judge Hetherington
In the office of the
Court Clerk MARILYN WILLIAMS

Case No. CJ-2017-816
Honorable Thad Balkman

William C. Hetherington
Special Discovery Master

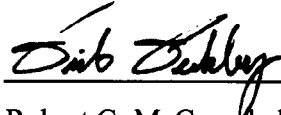
**TEVA DEFENDANTS' RESPONSE TO STATE'S MOTION SEEKING TO COMPEL
PRODUCTION OF DOCUMENTS IT HAS HAD FOR FIVE MONTHS**

During a recent hearing on the Defendants' Motion for Continuance the State revealed it has "over a hundred contract attorneys" reviewing the Defendants' documents. Ex. A, 3/8/19 Transcript, 56:4-5 (T. Duck). Apparently, the State and its massive contract team are moving so fast trying to meet a May 28th trial date they cannot find documents sitting in their laps.

The Teva Defendants have produced all of the relevant "call notes" in their possession, custody and control, including: (1) TEVA_OK_02317602 produced on 11-16-18 (2000-2005 nationwide Actiq® call activity); (2) TEVA_OK_01218843 produced on 8-29-18 (2006 nationwide Actiq® call activity); (3) TEVA_OK_01218835 produced on 8-29-18 (2006-2016 nationwide Fentora® call activity) and (4) TEVA_OK_01060405 produced on 8-29-18 (2015-2016 nationwide Fentora® call activity by Publicis). The specific call notes the State seeks with this Motion were produced on **November 16, 2018**, in "native" format with a coversheet bates labeled "TEVA_OK_02317602." A copy of the coversheet is attached as "Exhibit B" for the State's reference.

In sum, the State has the call notes it seeks. It has had them for approximately five months. Thus, its Motion seeking to compel them is moot.

Respectfully submitted,



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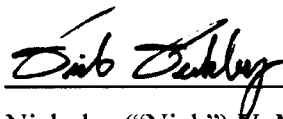
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I hereby certify that a true and correct copy of the foregoing was emailed this 22nd day of March, 2019, to the following:

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IN THE DISTRICT COURT OF CLEVELAND COUNTY

STATE OF OKLAHOMA

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

Plaintiff,)

vs.)

Case No. CJ-2017-816

- (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;)
- (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.)

**PORTIONS OF TRANSCRIPT MAY BE COVERED UNDER PROTECTIVE ORDER
TRANSCRIPT OF PROCEEDINGS
HAD ON MARCH 8, 2019
AT THE CLEVELAND COUNTY COURTHOUSE
BEFORE THE HONORABLE THAD BALKMAN
DISTRICT JUDGE**

REPORTED BY: ANGELA THAGARD, CSR, RPR



1 the e-mails. Nothing related to opioids, nothing related to
2 anything. So, Judge, we've got 80 million pages. Talk about a
3 data dump.

4 We have over a hundred contract attorneys helping us
5 review this stuff. Now, we haven't complained. That's the
6 first time you've ever heard the State complain. And I'm
7 actually not complaining. It's just to point out the hypocrisy
8 here.

9 We got through it, we saw those documents, we made sure
10 they weren't responsive, we moved on to the next one. And
11 we're going to keep doing that. We're going to keep reviewing
12 documents. We're going to keep moving forward.

13 Judge, we've heard a lot of inaccuracies today. Again, I
14 don't think they were intentional. But let's talk about some
15 of the accuracies.

16 First of all, you heard some of the numbers from Reggie,
17 and they were accurate numbers. I would like to say something
18 else that's accurate. This is accurate. The depositions on
19 this are accurate, and they don't scare us one bit. This
20 actually isn't as bad as it has been.

21 We've had a few days where we've had more than six
22 depositions on a single day. We've had seven and eight
23 depositions on a single day in four and five different states.
24 And each time, the State, with its team of 10 to 12 lawyers,
25 had a lawyer there, ready to take the deposition. And each

1 the proceedings in said cause.

2 I further certify that I am neither related to nor
3 attorney for any interested party nor otherwise interested in
4 the event of said action.

5 Dated this 9th day of March, 2019.

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8 ANGELA THAGARD, CSR, RPR
9 STATE OF OKLAHOMA
10 CERTIFIED SHORTHAND REPORTER
11 CSR# 1711
12 MY CERTIFICATION EXPIRES 12/31/2020

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File Provided Natively

