



IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel., §
MIKE HUNTER, §
ATTORNEY GENERAL OF OKLAHOMA, §
§
Plaintiff, §

Case No. CJ-2017-816

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. §

The Honorable Thad Balkman

Discovery Motion Submitted to:
Special Discovery Master
William C. Hetherington

STATE OF OKLAHOMA }
CLEVELAND COUNTY } S.S.

FILED
FEB 25 2019

In the office of the
Court Clerk MARILYN WILLIAMS

**THE STATE’S MOTION TO QUASH DEPOSITION NOTICES OF
CORPORATE REPRESENTATIVES ISSUED BY DEFENDANT TEVA**

On February 20, 2019, Defendant Teva Pharmaceuticals USA, Inc. issued eight (8) different *Notices to Take Section 3230(C)(5) Videotaped Deposition of Corporate Representative(s) of the State* (the “Notices”) on thirty-two (32) separate topics. *See* Ex. 1, Notices. However, the Notices do not comply with the Court’s express ruling that Teva must limit the Notices in both time and scope and not merely re-issue topics already covered in other depositions. Teva disregarded the Court’s Order, and the Notices should be quashed. In support of this Motion, the State states as follows:

1. On February 14, 2019, the Court heard, among many other motions, Teva's *Objections to Special Master's Ruling on State's Motion to Quash Notices to Take 3230(C)(5) Depositions of Corporate Representatives of the State* (filed 01/29/19). After hearing extensive argument from both sides, the Court ruled as follows:

It's my understanding in these matters that I think it's consistent with previous rulings, previous orders from Judge Hetherington in the scope of discovery that Teva be allowed limited depositions. I'm prepared to allow them to go forward with those notices on new topics, so long as they don't overlap, they're not duplicative. I would like to limit those to four hours, and that would be exclusive of cross-examination. And those would need to be completed by March 15th.

Ex. 2, 02/14/19 Hearing Transcript at 70:22-71:5 (J. Balkman). The State's counsel then sought clarification about the Court's ruling, asking whether the State would receive a new notice from Teva with more limited topics than its prior notices. *Id.* at 72:1-4 ("My understanding is the current notice has been found to be overlapping and unlimited. So do we get a new notice that has more limited topics than the ones they've already – I mean, I just don't want to get the same notice again.") (T. Duck).

2. As further clarification, the Court stated as follows:

THE COURT: Sure. Mr. Merkley, what I heard you say here this morning in the courtroom is that you're not going to simply ask for depositions on topics that have already been covered; that you're seeking information specific to Teva. Is that correct?

MR. MERKLEY: That's correct.

THE COURT: Okay. **So I would expect that those deposition notices would reflect what you've represented here in Court this morning.**

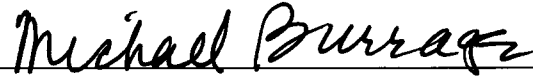
Id. at 72:5-13 (emphasis added). The Court further stated that the State was not prevented from once again seeking relief from the Special Master in the event Teva failed to comply with the Court's ruling on this issue. *Id.* at 72:25-73:9 ("If they have a good faith reason to believe that [Teva's Notices] violate[] a previous ruling, then I suspect that they would be able to bring that to the discovery master.") (J. Balkman).

3. A cursory review of the topics reveals that, as expected, Teva failed to appropriately limit the scope of the Notices. As just a few examples, Teva seeks corporate representative testimony on the policies and procedures relating to the PDMP (Topic 28), the State's "understanding of the causes of the 'Opioid Epidemic'" (Topic 34), communications between the State and any resident of Oklahoma regarding Opioid abuse (Topic 25), and the "use and abuse in Oklahoma of controlled or regulated substances other

than Opioids” (Topic 19). These topics are not specific to Teva, are entirely duplicative of depositions already taken in this case, and are in direct violation of the Court’s express order for Teva to issue amended, more limited Notices—not merely reissue Notices listing the same depositions topics as before. Despite Teva’s assurances to the Court, it failed to comply with the Court’s ruling.

For the reasons set forth above and in multiple rounds of prior briefing on the issue, the State respectfully requests the Court once again enter an Order quashing Teva’s Notices and prohibiting the depositions from proceeding, and for such further relief the Court deems proper.

Respectfully submitted,



Michael Burrage, OBA No. 1350
Reggie Whitten, OBA No. 9576
WHITTEN BURRAGE
512 N. Broadway Avenue, Suite 300
Oklahoma City, OK 73102
Telephone: (405) 516-7800
Facsimile: (405) 516-7859
Emails: mburrage@whittenburrage.com
rwhitten@whittenburrage.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

Bradley E. Beckworth, OBA No. 19982
Jeffrey J. Angelovich, OBA No. 19981
Trey Duck, OBA No. 33347
Drew Pate, *pro hac vice*
NIX PATTERSON, LLP
512 N. Broadway Avenue, Suite 200
Oklahoma City, OK 73102
Telephone: (405) 516-7800
Facsimile: (405) 516-7859
Emails: bbeckworth@nixlaw.com
jangelovich@npraustin.com

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 February 25, 2019 to:

Sanford C. Coats
Joshua D. Burns
Cullen D. Sweeney
CROWE & DUNLEVY, P.C.
Braniff Building
324 N. Robinson Ave., Ste. 100
Oklahoma City, OK 73102
sandy.coats@crowedunlevy.com
joshua.burns@crowedunlevy.com

Robert G. McCampbell
Nicholas Merkley
Ashley E. Quinn
Jeffrey A. Curran
GABLEGOTWALS
One Leadership Square, 15th Floor
211 North Robinson
Oklahoma City, OK 73102-7255
RMcCampbell@Gablelaw.com
NMerkley@Gablelaw.com
aquinn@gablelaw.com
jcurran@gablelaw.com

Steven A. Reed
Harvey Bartle IV
Mark A. Fiore
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103-2921
steven.reed@morganlewis.com
harvey.bartle@morganlewis.com
mark.fiore@morganlewis.com

Brian M. Ercole
Melissa M. Coates
Martha A. Leibell
MORGAN, LEWIS & BOCKIUS LLP
200 S. Biscayne Blvd., Suite 5300
Miami, FL 33131
brian.ercole@morganlewis.com
melissa.coates@morganlewis.com
martha.leibell@morganlewis.com

Sheila Birnbaum
Mark S. Cheffo
Hayden A. Coleman
Paul A. Lafata
Benjamin McAnaney
Eric Snapp
Jonathan S. Tam
Lindsay N. Zanello
Bert L. Wolff
Marina L. Schwartz
Mara C. Cusker Gonzalez
DECHERT, LLP
Three Byant Park
1095 Avenue of Americas
New York, NY 10036-6797
sheila.birnbaum@dechert.com
mark.cheffo@dechert.com
hayden.coleman@dechert.com
paul.lafata@dechert.com
jonathan.tam@dechert.com
lindsay.zanello@dechert.com
bert.wolff@dechert.com
Erik.snapp@dechert.com
Benjamin.mcananey@dechert.com
marina.schwarz@dechert.com
maracusker.gonzalez@dechert.com

Jae Hong Lee
DECHERT, LLP
One Bush Street, 16th Floor
San Francisco, CA 94104
jae.lee@dechert.com

Rachel M. Rosenberg
DECHERT LLP
Cira Centre, 2929 Arch Street
Philadelphia, PA 19104
Rachel.rosenberg@dechert.com

Amy Riley Lucas
Lauren S. Rakow
O'MELVENY & MYERS LLP
1999 Avenue of the Stars, 8th Floor
Los Angeles, California 90067
alucas@omm.com
lrakow@omm.com

Stephen D. Brody
David Roberts
Jessica L. Waddle
O'MELVENY & MYERS LLP
1625 Eye Street NW
Washington, DC 20006
sbrody@omm.com
droberts2@omm.com
jwaddle@omm.com

Daniel J. Franklin
Ross Galin
Desirae Krislie Cubero Tongco
O'MELVENY & MYERS LLP
7 Time Square
New York, NY 10036
Telephone: (212) 326-2000
dfranklin@omm.com
rgalin@omm.com
dtongco@omm.com

Jeffrey Allen Barker
O'MELVENY & MYERS, LLP
610 Newport Center Drive
Newport Beach, CA 92660
Tel: 949-823-6900
Fax: 949-823-6994
jbarker@omm.com

Britta Erin Stanton
John D. Volney
John Thomas Cox III
Eric Wolf Pinker
Jared D. Eisenburg
Jervonne D. Newsome
Patrick B. Disbennett
Elizabeth Y. Ryan
LYNN PINKER COX & HURST LLP
2100 Ross Avenue, Suite 2700
Dallas, TX 75201
bstanton@lynnllp.com
jvolney@lynnllp.com
tc Cox@lynnllp.com
epinker@lynnllp.com
jeisenberg@lynnllp.com
jnewsome@lynnllp.com
pdisbennett@lynnllp.com
eryan@lynnllp.com

Benjamin H. Odom
John H. Sparks
Michael Ridgeway
David L. Kinney
ODOM, SPARKS & JONES PLLC
HiPoint Office Building
2500 McGee Drive Ste. 140
Oklahoma City, OK 73072
odomb@odomsparks.com
sparksj@odomsparks.com
ridgewaym@odomsparks.com
kinneyd@odomsparks.com

Larry D. Ottaway
Amy Sherry Fischer
Andrew M. Bowman
Steven J. Johnson
Jordyn L. Cartmell
FOLIART, HUFF, OTTAWAY & BOTTOM
201 Robert S. Kerr Ave, 12th Floor
Oklahoma City, OK 73102
larryottaway@oklahomacounsel.com
amyfischer@oklahomacounsel.com
andrewbowman@oklahomacounsel.com
stevenjohnson@oklahomacounsel.com
jordyncartmell@oklahomacounsel.com

Robert S. Hoff
Wiggin & Dana, LLP
265 Church Street
New Haven, CT 06510
rhoff@wiggin.com


Michael Burrage

EXHIBIT 1

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.

Case No. CJ-2017-816
Honorable Thad Balkman

William C. Hetherington
Special Discovery Master

**NOTICE TO TAKE SECTION 3230(C)(5) VIDEOTAPED DEPOSITION OF
CORPORATE REPRESENTATIVE(S) OF THE STATE**

To: State of Oklahoma

Via Electronic Mail

Bradley Beckworth
Jeffrey Angelovich
Lloyd Nolan Duck, III
Brooke A. Churchman
Andrew G. Pate
Lisa Baldwin
Nathan B. Hall
NIX PATTERSON, LLP
512 N. Broadway Ave., Ste. 200
Oklahoma City, OK 73102

Robert Winn Cutler
Ross E Leonoudakis
NIX PATTERSON & ROACH
3600 N. Capital of Texas Hwy, Ste. B350
Austin, TX 78746

Michael Burrage
Reggie Whitten
J. Revell Parrish
WHITTEN BURRAGE
512 N. Broadway Ave., Ste. 300
Oklahoma City, OK 73102

Mike Hunter
Abby Dillsaver
Ethan Shaner
ATTORNEY GENERAL'S OFFICE
313 N.E. 21st Street
Oklahoma City, OK 73102

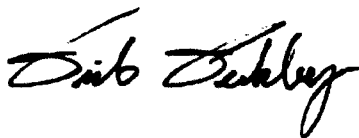
Glenn Coffee
Glenn Coffee & Associates, PLLC
915 North Robinson Avenue
Oklahoma City, OK 73102

Please take notice that, pursuant to 12 O.S. § 3230(C), Defendants Teva Pharmaceuticals USA, Inc., Cephalon, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc. (collectively, "Teva Defendants") will take the deposition upon oral examination of one or more corporate representative(s) of Plaintiff the State of Oklahoma (the "State") on the matters described in **Exhibit A** on **February 28, 2019, starting at 9:00 AM**, at the offices of Whitten Burrage, 512 North Broadway Avenue, Suite 300, Oklahoma City, Oklahoma 73102.

This deposition is to be used as evidence in the trial of the above action, and the deposition will be taken before an officer authorized by law to administer oaths. It will be recorded by stenographic means and will be videotaped. It will continue from day to day until completed.

Pursuant to 12 O.S. § 3230(C)(5), the State is hereby notified of its obligation to designate one or more officers, directors, managing agents, or other persons who consent to testify on the State's behalf about all matters described in **Exhibit A**. Please take further notice that each such officer, director, managing agent, or other person produced by the State to testify under 12 O.S. § 3230(C)(5) has an affirmative duty to have first reviewed all documents, reports, and other matters known or reasonably available to the State, and spoken to all potential witnesses known or reasonably available to the State, in order to provide informed and binding answers at the deposition(s).

DATED: February 20, 2019.



Robert G. McCampbell, OBA No. 10390
Nicholas ("Nick") V. Merkley, OBA No. 20284
Jeffrey A. Curran, OBA No. 12255
Ashley E. Quinn, OBA No. 33251
GABLEGOTWALS
One Leadership Square, 15th Fl.

211 North Robinson
Oklahoma City, OK 73102-7255
T: +1.405.235.3314
E-mail: RMcCampbell@Gablelaw.com
E-mail: NMerckley@Gablelaw.com
E-mail: JCurran@Gablelaw.com
E-mail: AQuinn@Gablelaw.com

OF COUNSEL:

Steven A. Reed
Harvey Bartle IV
Mark A. Fiore
Rebecca Hillyer
Nancy L. Patterson
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103-2921
T: +1.215.963.5000
E-mail: steven.reed@morganlewis.com
E-mail: harvey.bartle@morganlewis.com
E-mail: mark.fiore@morganlewis.com
E-mail: rebecca.hillyer@morganlewis.com
E-mail: nancy.patterson@morganlewis.com

Brian M. Ercole
Melissa M. Coates
Martha A. Leibell
MORGAN, LEWIS & BOCKIUS LLP
200 S. Biscayne Blvd., Suite 5300
Miami, FL 33131
T: +1.305.415.3000
E-mail: brian.ercole@morganlewis.com
E-mail: melissa.coates@morganlewis.com
Email: martha.leibell@morganlewis.com

*Attorneys for Defendants Cephalon, Inc., Teva
Pharmaceuticals USA, Inc., Watson Laboratories,
Inc., Actavis LLC, and Actavis Pharma, Inc. f/k/a
Watson Pharma, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was emailed this 20th day of February, 2019, to the following:

***Attorneys for
Plaintiff***

Mike Hunter, Attorney General
Abby Dillsaver, General Counsel
Ethan Shaner, Dep. Gen. Counsel
**ATTORNEY GENERAL'S
OFFICE**
313 N.E. 21st Street
Oklahoma City, OK 73105

Michael Burrage
Reggie Whitten
J. Revell Parrish
WHITTEN BURRAGE
512 N. Broadway Ave., Ste. 300
Oklahoma City, OK 73102

Bradley Beckworth
Jeffrey Angelovich
Lloyd Nolan Duck, III
Brooke A. Churchman
Andrew G. Pate
Lisa Baldwin
Nathan B. Hall
NIX, PATTERSON & ROACH
512 N. Broadway Ave., Ste. 200
Oklahoma City, OK 73102

Robert Winn Cutler
Ross E Leonoudakis
NIX PATTERSON & ROACH
3600 N. Capital of Texas Hwy.
Suite B350
Austin, TX 78746

Glenn Coffee
**GLENN COFFEE &
ASSOCIATES, PLLC**
915 N. Robinson Ave.
Oklahoma City, OK 73102

*Attorneys for
Johnson &
Johnson, Janssen
Pharmaceutica,
Inc., N/K/A
Janssen
Pharmaceuticals,
Inc. and Ortho-
McNeil-Janssen
Pharmaceuticals,
Inc. N/K/A Janssen
Pharmaceuticals,
Inc.*

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

Charles C. Lifland
Jennifer D. Cardelus
Wallace M. Allan
Sabrina H. Strong
Houman Ehsan
Esteban Rodriguez
O'MELVENY & MEYERS
400 S. Hope Street, 18th Floor
Los Angeles, CA 90071

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

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

Amy R. Lucas
Lauren S. Rakow
Jessica L. Waddle
O'MELVENY & MEYERS
1999 Ave. of the Stars, 8th Fl.
Los Angeles, CA 90067

Jeffrey A. Barker
O'MELVENY & MEYERS
610 Newport Center Drive
Newport Beach, CA 92660

Larry D. Ottaway
Amy Sherry Fischer
Andrew Bowman
Jordyn L. Cartmell
**FOLIART, HUFF, OTTAWAY &
BOTTOM**
201 Robert S. Kerr Avenue, 12th Fl.
Oklahoma City, OK 73102

*Attorneys for
Purdue Pharma,
LP,
Purdue Pharma,
Inc. and The
Purdue Frederick
Company*

Sheila L. Birnbaum
Mark S. Cheffo
Hayden Adam Coleman
Paul LaFata
Jonathan S. Tam
Lindsay N. Zanello
Bert L. Wolff
Mara C. Cusker Gonzalez
DECHERT, LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036

William W. Oxley
DECHERT LLP
U.S. Bank Tower
633 West 5th Street, Suite 4900
Los Angeles, CA 90071

Britta E. Stanton
John D. Volney
John T. Cox, III
Eric W. Pinker
Jared D. Eisenberg
Jervonne D. Newsome
Ruben A. Garcia
Russell Guy Herman
Samuel Butler Hardy, IV
**LYNN PINKER COX &
HURST, LLP**
2100 Ross Avenue, Suite 2700
Dallas, TX 75201

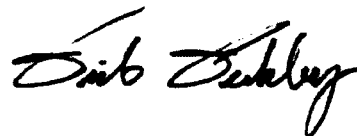
Erik W. Snapp
DECHERT, LLP
35 West Wacker Drive, Ste. 3400
Chicago, IL 60601

Benjamin F. McAnaney
Hope S. Freiwald
Will W. Sachse
DECHERT, LLP
2929 Arch Street
Philadelphia, PA 19104

Jonathan S. Tam
Jae Hong Lee
DECHERT, LLP
One Bush Street, 16th Floor
San Francisco, CA 94104

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

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



Nick Merkley

EXHIBIT A

<u>TOPIC #</u>	<u>TOPIC DESCRIPTION</u>
17	The State's investigation into, civil or criminal prosecution of, and/or discipline of doctors, pharmacists, pharmacies, clinics, "pill mills," or hospitals in Oklahoma for the improper prescribing or diversion of Opioids during the Relevant Time Period, including the State's knowledge of any complaints regarding improper opioid prescribing practices of any Healthcare Professional in Oklahoma.
28	Policies and procedures applicable to Healthcare Providers and pharmacies regarding use of the Oklahoma Prescription Drug Monitoring Program (PDMP) administered by the Oklahoma Bureau of Narcotics and Dangerous Drugs Control.
29	The State's knowledge of and monitoring of the quantities of prescription Opioids prescribed, dispensed, sold, distributed, and used in Oklahoma, including its knowledge of the setting of quotas by the DEA for prescription Opioids.

**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.

Case No. CJ-2017-816
Honorable Thad Balkman

William C. Hetherington
Special Discovery Master

**NOTICE TO TAKE SECTION 3230(C)(5) VIDEOTAPED DEPOSITION OF
CORPORATE REPRESENTATIVE(S) OF THE STATE**

To: State of Oklahoma

Via Electronic Mail

Bradley Beckworth
Jeffrey Angelovich
Lloyd Nolan Duck, III
Brooke A. Churchman
Andrew G. Pate
Lisa Baldwin
Nathan B. Hall
NIX PATTERSON, LLP
512 N. Broadway Ave., Ste. 200
Oklahoma City, OK 73102

Robert Winn Cutler
Ross E Leonoudakis
NIX PATTERSON & ROACH
3600 N. Capital of Texas Hwy, Ste. B350
Austin, TX 78746

Michael Burrage
Reggie Whitten
J. Revell Parrish
WHITTEN BURRAGE
512 N. Broadway Ave., Ste. 300
Oklahoma City, OK 73102

Mike Hunter
Abby Dillsaver
Ethan Shaner
ATTORNEY GENERAL'S OFFICE
313 N.E. 21st Street
Oklahoma City, OK 73102

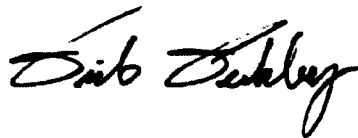
Glenn Coffee
Glenn Coffee & Associates, PLLC
915 North Robinson Avenue
Oklahoma City, OK 73102

Please take notice that, pursuant to 12 O.S. § 3230(C), Defendants Teva Pharmaceuticals USA, Inc., Cephalon, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc. (collectively, "Teva Defendants") will take the deposition upon oral examination of one or more corporate representative(s) of Plaintiff the State of Oklahoma (the "State") on the matters described in **Exhibit A** on **February 28, 2019, starting at 9:00 AM**, at the offices of Whitten Burrage, 512 North Broadway Avenue, Suite 300, Oklahoma City, Oklahoma 73102.

This deposition is to be used as evidence in the trial of the above action, and the deposition will be taken before an officer authorized by law to administer oaths. It will be recorded by stenographic means and will be videotaped. It will continue from day to day until completed.

Pursuant to 12 O.S. § 3230(C)(5), the State is hereby notified of its obligation to designate one or more officers, directors, managing agents, or other persons who consent to testify on the State's behalf about all matters described in **Exhibit A**. Please take further notice that each such officer, director, managing agent, or other person produced by the State to testify under 12 O.S. § 3230(C)(5) has an affirmative duty to have first reviewed all documents, reports, and other matters known or reasonably available to the State, and spoken to all potential witnesses known or reasonably available to the State, in order to provide informed and binding answers at the deposition(s).

DATED: February 20, 2019.



Robert G. McCampbell, OBA No. 10390
Nicholas ("Nick") V. Merkley, OBA No. 20284
Jeffrey A. Curran, OBA No. 12255
Ashley E. Quinn, OBA No. 33251
GABLEGOTWALS
One Leadership Square, 15th Fl.

211 North Robinson
Oklahoma City, OK 73102-7255
T: +1.405.235.3314
E-mail: RMcCampbell@Gablelaw.com
E-mail: NMerkeley@Gablelaw.com
E-mail: JCurran@Gablelaw.com
E-mail: AQuinn@Gablelaw.com

OF COUNSEL:

Steven A. Reed
Harvey Bartle IV
Mark A. Fiore
Rebecca Hillyer
Nancy L. Patterson

MORGAN, LEWIS & BOCKIUS LLP

1701 Market Street
Philadelphia, PA 19103-2921
T: +1.215.963.5000
E-mail: steven.reed@morganlewis.com
E-mail: harvey.bartle@morganlewis.com
E-mail: mark.fiore@morganlewis.com
E-mail: rebecca.hillyer@morganlewis.com
E-mail: nancy.patterson@morganlewis.com

Brian M. Ercole
Melissa M. Coates
Martha A. Leibell
MORGAN, LEWIS & BOCKIUS LLP
200 S. Biscayne Blvd., Suite 5300
Miami, FL 33131
T: +1.305.415.3000
E-mail: brian.ercole@morganlewis.com
E-mail: melissa.coates@morganlewis.com
Email: martha.leibell@morganlewis.com

*Attorneys for Defendants Cephalon, Inc., Teva
Pharmaceuticals USA, Inc., Watson Laboratories,
Inc., Actavis LLC, and Actavis Pharma, Inc. f/k/a
Watson Pharma, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was emailed this 20th day of February, 2019, to the following:

***Attorneys for
Plaintiff***

Mike Hunter, Attorney General
Abby Dillsaver, General Counsel
Ethan Shaner, Dep. Gen. Counsel
**ATTORNEY GENERAL'S
OFFICE**
313 N.E. 21st Street
Oklahoma City, OK 73105

Michael Burrage
Reggie Whitten
J. Revell Parrish
WHITTEN BURRAGE
512 N. Broadway Ave., Ste. 300
Oklahoma City, OK 73102

Bradley Beckworth
Jeffrey Angelovich
Lloyd Nolan Duck, III
Brooke A. Churchman
Andrew G. Pate
Lisa Baldwin
Nathan B. Hall
NIX, PATTERSON & ROACH
512 N. Broadway Ave., Ste. 200
Oklahoma City, OK 73102

Robert Winn Cutler
Ross E Leonoudakis
NIX PATTERSON & ROACH
3600 N. Capital of Texas Hwy.
Suite B350
Austin, TX 78746

Glenn Coffee
**GLENN COFFEE &
ASSOCIATES, PLLC**
915 N. Robinson Ave.
Oklahoma City, OK 73102

*Attorneys for
Johnson &
Johnson, Janssen
Pharmaceutica,
Inc., N/K/A
Janssen
Pharmaceuticals,
Inc., and Ortho-
McNeil-Janssen
Pharmaceuticals,
Inc. N/K/A Janssen
Pharmaceuticals,
Inc.*

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

Charles C. Lifland
Jennifer D. Cardelus
Wallace M. Allan
Sabrina H. Strong
Houman Ehsan
Esteban Rodriguez
O'MELVENY & MEYERS
400 S. Hope Street, 18th Floor
Los Angeles, CA 90071

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

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

Amy R. Lucas
Lauren S. Rakow
Jessica L. Waddle
O'MELVENY & MEYERS
1999 Ave. of the Stars, 8th Fl.
Los Angeles, CA 90067

Jeffrey A. Barker
O'MELVENY & MEYERS
610 Newport Center Drive
Newport Beach, CA 92660

Larry D. Ottaway
Amy Sherry Fischer
Andrew Bowman
Jordyn L. Cartmell
**FOLIART, HUFF, OTTAWAY &
BOTTOM**
201 Robert S. Kerr Avenue, 12th Fl.
Oklahoma City, OK 73102

*Attorneys for
Purdue Pharma,
LP,
Purdue Pharma,
Inc. and The
Purdue Frederick
Company*

Sheila L. Birnbaum
Mark S. Cheffo
Hayden Adam Coleman
Paul LaFata
Jonathan S. Tam
Lindsay N. Zanello
Bert L. Wolff
Mara C. Cusker Gonzalez
DECHERT, LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036

Erik W. Snapp
DECHERT, LLP
35 West Wacker Drive, Ste. 3400
Chicago, IL 60601

Benjamin F. McAnaney
Hope S. Freiwald
Will W. Sachse
DECHERT, LLP
2929 Arch Street
Philadelphia, PA 19104

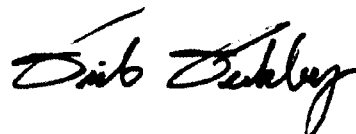
William W. Oxley
DECHERT LLP
U.S. Bank Tower
633 West 5th Street, Suite 4900
Los Angeles, CA 90071

Jonathan S. Tam
Jae Hong Lee
DECHERT, LLP
One Bush Street, 16th Floor
San Francisco, CA 94104

Britta E. Stanton
John D. Volney
John T. Cox, III
Eric W. Pinker
Jared D. Eisenberg
Jervonne D. Newsome
Ruben A. Garcia
Russell Guy Herman
Samuel Butler Hardy, IV
**LYNN PINKER COX &
HURST, LLP**
2100 Ross Avenue, Suite 2700
Dallas, TX 75201

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

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



Nick Merkley

EXHIBIT A

<u>TOPIC #</u>	<u>TOPIC DESCRIPTION</u>
8	The nature and circumstances regarding any Opioid prescriptions manufactured by the Teva Defendants, including for Actiq and Fentora, written by Healthcare Professionals employed by the State or who practiced at facilities owned, operated, or affiliated with the State.
30	The nature and circumstances behind the coverage or reimbursement of prescription Opioids, including Actiq or Fentora, on the State's behalf during the Relevant Time Period (and any changes with respect to coverage or reimbursement), including on behalf of Plaintiff's employees, their dependents, incarcerated persons, Medicaid enrollees, or pension beneficiaries.

**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.

Case No. CJ-2017-816
Honorable Thad Balkman

William C. Hetherington
Special Discovery Master

**NOTICE TO TAKE SECTION 3230(C)(5) VIDEOTAPED DEPOSITION OF
CORPORATE REPRESENTATIVE(S) OF THE STATE**

To: State of Oklahoma

Via Electronic Mail

Bradley Beckworth
Jeffrey Angelovich
Lloyd Nolan Duck, III
Brooke A. Churchman
Andrew G. Pate
Lisa Baldwin
Nathan B. Hall
NIX PATTERSON, LLP
512 N. Broadway Ave., Ste. 200
Oklahoma City, OK 73102

Robert Winn Cutler
Ross E Leonoudakis
NIX PATTERSON & ROACH
3600 N. Capital of Texas Hwy, Ste. B350
Austin, TX 78746

Michael Burrage
Reggie Whitten
J. Revell Parrish
WHITTEN BURRAGE
512 N. Broadway Ave., Ste. 300
Oklahoma City, OK 73102

Mike Hunter
Abby Dillsaver
Ethan Shaner
ATTORNEY GENERAL'S OFFICE
313 N.E. 21st Street
Oklahoma City, OK 73102

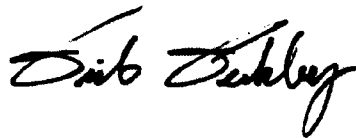
Glenn Coffee
Glenn Coffee & Associates, PLLC
915 North Robinson Avenue
Oklahoma City, OK 73102

Please take notice that, pursuant to 12 O.S. § 3230(C), Defendants Teva Pharmaceuticals USA, Inc., Cephalon, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc. (collectively, "Teva Defendants") will take the deposition upon oral examination of one or more corporate representative(s) of Plaintiff the State of Oklahoma (the "State") on the matters described in **Exhibit A** on **March 1, 2019, starting at 9:00 AM**, at the offices of Whitten Burrage, 512 North Broadway Avenue, Suite 300, Oklahoma City, Oklahoma 73102.

This deposition is to be used as evidence in the trial of the above action, and the deposition will be taken before an officer authorized by law to administer oaths. It will be recorded by stenographic means and will be videotaped. It will continue from day to day until completed.

Pursuant to 12 O.S. § 3230(C)(5), the State is hereby notified of its obligation to designate one or more officers, directors, managing agents, or other persons who consent to testify on the State's behalf about all matters described in **Exhibit A**. Please take further notice that each such officer, director, managing agent, or other person produced by the State to testify under 12 O.S. § 3230(C)(5) has an affirmative duty to have first reviewed all documents, reports, and other matters known or reasonably available to the State, and spoken to all potential witnesses known or reasonably available to the State, in order to provide informed and binding answers at the deposition(s).

DATED: February 20, 2019.



Robert G. McCampbell, OBA No. 10390
Nicholas ("Nick") V. Merkley, OBA No. 20284
Jeffrey A. Curran, OBA No. 12255
Ashley E. Quinn, OBA No. 33251
GABLEGOTWALS
One Leadership Square, 15th Fl.

211 North Robinson
Oklahoma City, OK 73102-7255
T: +1.405.235.3314
E-mail: RMcCampbell@Gablelaw.com
E-mail: NMerkley@Gablelaw.com
E-mail: JCurran@Gablelaw.com
E-mail: AQuinn@Gablelaw.com

OF COUNSEL:

Steven A. Reed
Harvey Bartle IV
Mark A. Fiore
Rebecca Hillyer
Nancy L. Patterson
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103-2921
T: +1.215.963.5000
E-mail: steven.reed@morganlewis.com
E-mail: harvey.bartle@morganlewis.com
E-mail: mark.fiore@morganlewis.com
E-mail: rebecca.hillyer@morganlewis.com
E-mail: nancy.patterson@morganlewis.com

Brian M. Ercole
Melissa M. Coates
Martha A. Leibell
MORGAN, LEWIS & BOCKIUS LLP
200 S. Biscayne Blvd., Suite 5300
Miami, FL 33131
T: +1.305.415.3000
E-mail: brian.ercole@morganlewis.com
E-mail: melissa.coates@morganlewis.com
Email: martha.leibell@morganlewis.com

*Attorneys for Defendants Cephalon, Inc., Teva
Pharmaceuticals USA, Inc., Watson Laboratories,
Inc., Actavis LLC, and Actavis Pharma, Inc. f/k/a
Watson Pharma, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was emailed this 20th day of February, 2019, to the following:

***Attorneys for
Plaintiff***

Mike Hunter, Attorney General
Abby Dillsaver, General Counsel
Ethan Shaner, Dep. Gen. Counsel
**ATTORNEY GENERAL'S
OFFICE**
313 N.E. 21st Street
Oklahoma City, OK 73105

Michael Burrage
Reggie Whitten
J. Revell Parrish
WHITTEN BURRAGE
512 N. Broadway Ave., Ste. 300
Oklahoma City, OK 73102

Bradley Beckworth
Jeffrey Angelovich
Lloyd Nolan Duck, III
Brooke A. Churchman
Andrew G. Pate
Lisa Baldwin
Nathan B. Hall
NIX, PATTERSON & ROACH
512 N. Broadway Ave., Ste. 200
Oklahoma City, OK 73102

Robert Winn Cutler
Ross E Leonoudakis
NIX PATTERSON & ROACH
3600 N. Capital of Texas Hwy.
Suite B350
Austin, TX 78746

Glenn Coffee
**GLENN COFFEE &
ASSOCIATES, PLLC**
915 N. Robinson Ave.
Oklahoma City, OK 73102

*Attorneys for
Johnson &
Johnson, Janssen
Pharmaceutica,
Inc., N/K/A
Janssen
Pharmaceuticals,
Inc., and Ortho-
McNeil-Janssen
Pharmaceuticals,
Inc. N/K/A Janssen
Pharmaceuticals,
Inc.*

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

Charles C. Lifland
Jennifer D. Cardelus
Wallace M. Allan
Sabrina H. Strong
Houman Ehsan
Esteban Rodriguez
O'MELVENY & MEYERS
400 S. Hope Street, 18th Floor
Los Angeles, CA 90071

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

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

Amy R. Lucas
Lauren S. Rakow
Jessica L. Waddle
O'MELVENY & MEYERS
1999 Ave. of the Stars, 8th Fl.
Los Angeles, CA 90067

Jeffrey A. Barker
O'MELVENY & MEYERS
610 Newport Center Drive
Newport Beach, CA 92660

Larry D. Ottaway
Amy Sherry Fischer
Andrew Bowman
Jordyn L. Cartmell
**FOLIART, HUFF, OTTAWAY &
BOTTOM**
201 Robert S. Kerr Avenue, 12th Fl.
Oklahoma City, OK 73102

**Attorneys for
Purdue Pharma,
LP,
Purdue Pharma,
Inc. and The
Purdue Frederick
Company**

Sheila L. Birnbaum
Mark S. Cheffo
Hayden Adam Coleman
Paul LaFata
Jonathan S. Tam
Lindsay N. Zanello
Bert L. Wolff
Mara C. Cusker Gonzalez
DECHERT, LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036

William W. Oxley
DECHERT LLP
U.S. Bank Tower
633 West 5th Street, Suite 4900
Los Angeles, CA 90071

Britta E. Stanton
John D. Volney
John T. Cox, III
Eric W. Pinker
Jared D. Eisenberg
Jervonne D. Newsome
Ruben A. Garcia
Russell Guy Herman
Samuel Butler Hardy, IV
**LYNN PINKER COX &
HURST, LLP**
2100 Ross Avenue, Suite 2700
Dallas, TX 75201

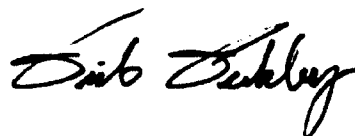
Erik W. Snapp
DECHERT, LLP
35 West Wacker Drive, Ste. 3400
Chicago, IL 60601

Benjamin F. McAnaney
Hope S. Freiwald
Will W. Sachse
DECHERT, LLP
2929 Arch Street
Philadelphia, PA 19104

Jonathan S. Tam
Jae Hong Lee
DECHERT, LLP
One Bush Street, 16th Floor
San Francisco, CA 94104

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

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



Nick Merkley

EXHIBIT A

<u>TOPIC #</u>	<u>TOPIC DESCRIPTION</u>
1	Any pre-suit investigation conducted by the State regarding any Teva Defendant or prescription Opioids.
2	The nature and circumstances of any false, misleading, unlawful, and/or deceptive statements, omissions, or conduct concerning prescription Opioids, including Actiq or Fentora, made in Oklahoma during the Relevant Time by: (a) Cephalon; (b) Teva USA; (c) Watson; (d) Actavis LLC; and/or (e) Actavis Pharma.
3	The nature and circumstances of any false, misleading, unlawful, and/or deceptive statements, omissions, or conduct concerning prescription Opioids, including Actiq or Fentora, made by any third party in Oklahoma during the Relevant Time that the State seeks to attribute to: (a) Cephalon; (b) Teva USA; (c) Watson; (d) Actavis LLC; and/or (e) Actavis Pharma.
4	The nature and circumstances of any false, misleading, unlawful, and/or deceptive statement, omission, or conduct attributable to any Teva Defendant that caused any Healthcare Provider in Oklahoma to write an Opioid prescription during the Relevant Time Period.
10	The nature of and the factual basis for the claims alleged in the Petition against each of the Teva Defendants.
38	The factual bases supporting your assertion that each of the Teva Defendants agreed with the other Defendants in this case to engage in “decades long false and deceptive marketing campaign,” as alleged in paragraph 40 of the Petition, including the dates that each Teva Defendant allegedly agreed to engage in such a campaign and the means by which each Teva Defendant participated in that campaign.

**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.

Case No. CJ-2017-816
Honorable Thad Balkman

William C. Hetherington
Special Discovery Master

**NOTICE TO TAKE SECTION 3230(C)(5) VIDEOTAPED DEPOSITION OF
CORPORATE REPRESENTATIVE(S) OF THE STATE**

To: State of Oklahoma

Via Electronic Mail

Bradley Beckworth
Jeffrey Angelovich
Lloyd Nolan Duck, III
Brooke A. Churchman
Andrew G. Pate
Lisa Baldwin
Nathan B. Hall
NIX PATTERSON, LLP
512 N. Broadway Ave., Ste. 200
Oklahoma City, OK 73102

Robert Winn Cutler
Ross E Leonoudakis
NIX PATTERSON & ROACH
3600 N. Capital of Texas Hwy, Ste. B350
Austin, TX 78746

Michael Burrage
Reggie Whitten
J. Revell Parrish
WHITTEN BURRAGE
512 N. Broadway Ave., Ste. 300
Oklahoma City, OK 73102

Mike Hunter
Abby Dillsaver
Ethan Shaner
ATTORNEY GENERAL'S OFFICE
313 N.E. 21st Street
Oklahoma City, OK 73102

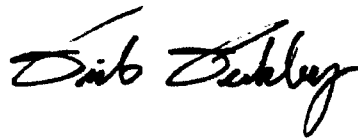
Glenn Coffee
Glenn Coffee & Associates, PLLC
915 North Robinson Avenue
Oklahoma City, OK 73102

Please take notice that, pursuant to 12 O.S. § 3230(C), Defendants Teva Pharmaceuticals USA, Inc., Cephalon, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc. (collectively, "Teva Defendants") will take the deposition upon oral examination of one or more corporate representative(s) of Plaintiff the State of Oklahoma (the "State") on the matters described in **Exhibit A** on **March 4, 2019, starting at 9:00 AM**, at the offices of Whitten Burrage, 512 North Broadway Avenue, Suite 300, Oklahoma City, Oklahoma 73102.

This deposition is to be used as evidence in the trial of the above action, and the deposition will be taken before an officer authorized by law to administer oaths. It will be recorded by stenographic means and will be videotaped. It will continue from day to day until completed.

Pursuant to 12 O.S. § 3230(C)(5), the State is hereby notified of its obligation to designate one or more officers, directors, managing agents, or other persons who consent to testify on the State's behalf about all matters described in **Exhibit A**. Please take further notice that each such officer, director, managing agent, or other person produced by the State to testify under 12 O.S. § 3230(C)(5) has an affirmative duty to have first reviewed all documents, reports, and other matters known or reasonably available to the State, and spoken to all potential witnesses known or reasonably available to the State, in order to provide informed and binding answers at the deposition(s).

DATED: February 20, 2019.



Robert G. McCampbell, OBA No. 10390
Nicholas ("Nick") V. Merkley, OBA No. 20284
Jeffrey A. Curran, OBA No. 12255
Ashley E. Quinn, OBA No. 33251
GABLEGOTWALS
One Leadership Square, 15th Fl.

211 North Robinson
Oklahoma City, OK 73102-7255
T: +1.405.235.3314
E-mail: RMcCampbell@Gablelaw.com
E-mail: NMerkeley@Gablelaw.com
E-mail: JCurran@Gablelaw.com
E-mail: AQuinn@Gablelaw.com

OF COUNSEL:

Steven A. Reed
Harvey Bartle IV
Mark A. Fiore
Rebecca Hillyer
Nancy L. Patterson

MORGAN, LEWIS & BOCKIUS LLP

1701 Market Street
Philadelphia, PA 19103-2921
T: +1.215.963.5000
E-mail: steven.reed@morganlewis.com
E-mail: harvey.bartle@morganlewis.com
E-mail: mark.fiore@morganlewis.com
E-mail: rebecca.hillyer@morganlewis.com
E-mail: nancy.patterson@morganlewis.com

Brian M. Ercole
Melissa M. Coates
Martha A. Leibell

MORGAN, LEWIS & BOCKIUS LLP

200 S. Biscayne Blvd., Suite 5300
Miami, FL 33131
T: +1.305.415.3000
E-mail: brian.ercole@morganlewis.com
E-mail: melissa.coates@morganlewis.com
Email: martha.leibell@morganlewis.com

*Attorneys for Defendants Cephalon, Inc., Teva
Pharmaceuticals USA, Inc., Watson Laboratories,
Inc., Actavis LLC, and Actavis Pharma, Inc. f/k/a
Watson Pharma, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was emailed this 20th day of February, 2019, to the following:

<i>Attorneys for Plaintiff</i>	Mike Hunter, Attorney General Abby Dillsaver, General Counsel Ethan Shaner, Dep. Gen. Counsel ATTORNEY GENERAL'S OFFICE 313 N.E. 21st Street Oklahoma City, OK 73105	Michael Burrage Reggie Whitten J. Revell Parrish WHITTEN BURRAGE 512 N. Broadway Ave., Ste. 300 Oklahoma City, OK 73102
	Bradley Beckworth Jeffrey Angelovich Lloyd Nolan Duck, III Brooke A. Churchman Andrew G. Pate Lisa Baldwin Nathan B. Hall NIX, PATTERSON & ROACH 512 N. Broadway Ave., Ste. 200 Oklahoma City, OK 73102	Robert Winn Cutler Ross E Leonoudakis NIX PATTERSON & ROACH 3600 N. Capital of Texas Hwy. Suite B350 Austin, TX 78746
	Glenn Coffee GLENN COFFEE & ASSOCIATES, PLLC 915 N. Robinson Ave. Oklahoma City, OK 73102	

*Attorneys for
Johnson &
Johnson, Janssen
Pharmaceutica,
Inc., N/K/A
Janssen
Pharmaceuticals,
Inc., and Ortho-
McNeil-Janssen
Pharmaceuticals,
Inc. N/K/A Janssen
Pharmaceuticals,
Inc.*

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

Charles C. Lifland
Jennifer D. Cardelus
Wallace M. Allan
Sabrina H. Strong
Houman Ehsan
Esteban Rodriguez
O'MELVENY & MEYERS
400 S. Hope Street, 18th Floor
Los Angeles, CA 90071

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

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

Amy R. Lucas
Lauren S. Rakow
Jessica L. Waddle
O'MELVENY & MEYERS
1999 Ave. of the Stars, 8th Fl.
Los Angeles, CA 90067

Jeffrey A. Barker
O'MELVENY & MEYERS
610 Newport Center Drive
Newport Beach, CA 92660

Larry D. Ottaway
Amy Sherry Fischer
Andrew Bowman
Jordyn L. Cartmell
**FOLIART, HUFF, OTTAWAY &
BOTTOM**
201 Robert S. Kerr Avenue, 12th Fl.
Oklahoma City, OK 73102

**Attorneys for
Purdue Pharma,
LP,
Purdue Pharma,
Inc. and The
Purdue Frederick
Company**

Sheila L. Birnbaum
Mark S. Cheffo
Hayden Adam Coleman
Paul LaFata
Jonathan S. Tam
Lindsay N. Zanello
Bert L. Wolff
Mara C. Cusker Gonzalez
DECHERT, LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036

William W. Oxley
DECHERT LLP
U.S. Bank Tower
633 West 5th Street, Suite 4900
Los Angeles, CA 90071

Britta E. Stanton
John D. Volney
John T. Cox, III
Eric W. Pinker
Jared D. Eisenberg
Jervonne D. Newsome
Ruben A. Garcia
Russell Guy Herman
Samuel Butler Hardy, IV
**LYNN PINKER COX &
HURST, LLP**
2100 Ross Avenue, Suite 2700
Dallas, TX 75201

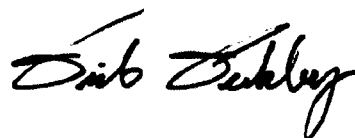
Erik W. Snapp
DECHERT, LLP
35 West Wacker Drive, Ste. 3400
Chicago, IL 60601

Benjamin F. McAnaney
Hope S. Freiwald
Will W. Sachse
DECHERT, LLP
2929 Arch Street
Philadelphia, PA 19104

Jonathan S. Tam
Jae Hong Lee
DECHERT, LLP
One Bush Street, 16th Floor
San Francisco, CA 94104

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

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



Nick Merkley

EXHIBIT A

<u>TOPIC #</u>	<u>TOPIC DESCRIPTION</u>
5	The nature and circumstances regarding any patients in Oklahoma that were harmed by any prescription Opioid manufactured by any Teva Defendant.
16	The factual nexus between any Teva Defendant and any prescription Opioid, incident of Opioid abuse, or any other harm for which the State seeks relief from the Teva Defendants.
20	Your knowledge of individuals who overdosed on, or became addicted to, prescription Opioids in Oklahoma, including any individuals who overdosed on or became addicted to Actiq, Fentora, or any prescription Opioid manufactured by any Teva Defendant.

**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.

Case No. CJ-2017-816
Honorable Thad Balkman

William C. Hetherington
Special Discovery Master

**NOTICE TO TAKE SECTION 3230(C)(5) VIDEOTAPED DEPOSITION OF
CORPORATE REPRESENTATIVE(S) OF THE STATE**

To: State of Oklahoma

Via Electronic Mail

Bradley Beckworth
Jeffrey Angelovich
Lloyd Nolan Duck, III
Brooke A. Churchman
Andrew G. Pate
Lisa Baldwin
Nathan B. Hall
NIX PATTERSON, LLP
512 N. Broadway Ave., Ste. 200
Oklahoma City, OK 73102

Robert Winn Cutler
Ross E Leonoudakis
NIX PATTERSON & ROACH
3600 N. Capital of Texas Hwy, Ste. B350
Austin, TX 78746

Michael Burrage
Reggie Whitten
J. Revell Parrish
WHITTEN BURRAGE
512 N. Broadway Ave., Ste. 300
Oklahoma City, OK 73102

Mike Hunter
Abby Dillsaver
Ethan Shaner
ATTORNEY GENERAL'S OFFICE
313 N.E. 21st Street
Oklahoma City, OK 73102

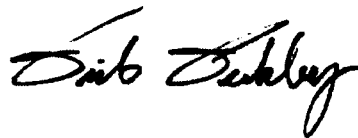
Glenn Coffee
Glenn Coffee & Associates, PLLC
915 North Robinson Avenue
Oklahoma City, OK 73102

Please take notice that, pursuant to 12 O.S. § 3230(C), Defendants Teva Pharmaceuticals USA, Inc., Cephalon, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc. (collectively, "Teva Defendants") will take the deposition upon oral examination of one or more corporate representative(s) of Plaintiff the State of Oklahoma (the "State") on the matters described in **Exhibit A** on **March 5, 2019, starting at 9:00 AM**, at the offices of Whitten Burrage, 512 North Broadway Avenue, Suite 300, Oklahoma City, Oklahoma 73102.

This deposition is to be used as evidence in the trial of the above action, and the deposition will be taken before an officer authorized by law to administer oaths. It will be recorded by stenographic means and will be videotaped. It will continue from day to day until completed.

Pursuant to 12 O.S. § 3230(C)(5), the State is hereby notified of its obligation to designate one or more officers, directors, managing agents, or other persons who consent to testify on the State's behalf about all matters described in **Exhibit A**. Please take further notice that each such officer, director, managing agent, or other person produced by the State to testify under 12 O.S. § 3230(C)(5) has an affirmative duty to have first reviewed all documents, reports, and other matters known or reasonably available to the State, and spoken to all potential witnesses known or reasonably available to the State, in order to provide informed and binding answers at the deposition(s).

DATED: February 20, 2019.



Robert G. McCampbell, OBA No. 10390
Nicholas ("Nick") V. Merkley, OBA No. 20284
Jeffrey A. Curran, OBA No. 12255
Ashley E. Quinn, OBA No. 33251
GABLEGOTWALS
One Leadership Square, 15th Fl.

211 North Robinson
Oklahoma City, OK 73102-7255
T: +1.405.235.3314
E-mail: RMcCampbell@Gablelaw.com
E-mail: NMerkeley@Gablelaw.com
E-mail: JCurran@Gablelaw.com
E-mail: AQuinn@Gablelaw.com

OF COUNSEL:

Steven A. Reed
Harvey Bartle IV
Mark A. Fiore
Rebecca Hillyer
Nancy L. Patterson

MORGAN, LEWIS & BOCKIUS LLP

1701 Market Street
Philadelphia, PA 19103-2921
T: +1.215.963.5000
E-mail: steven.reed@morganlewis.com
E-mail: harvey.bartle@morganlewis.com
E-mail: mark.fiore@morganlewis.com
E-mail: rebecca.hillyer@morganlewis.com
E-mail: nancy.patterson@morganlewis.com

Brian M. Ercole
Melissa M. Coates
Martha A. Leibell
MORGAN, LEWIS & BOCKIUS LLP
200 S. Biscayne Blvd., Suite 5300
Miami, FL 33131
T: +1.305.415.3000
E-mail: brian.ercole@morganlewis.com
E-mail: melissa.coates@morganlewis.com
Email: martha.leibell@morganlewis.com

*Attorneys for Defendants Cephalon, Inc., Teva
Pharmaceuticals USA, Inc., Watson Laboratories,
Inc., Actavis LLC, and Actavis Pharma, Inc. f/k/a
Watson Pharma, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was emailed this 20th day of February, 2019, to the following:

***Attorneys for
Plaintiff***

Mike Hunter, Attorney General
Abby Dillsaver, General Counsel
Ethan Shaner, Dep. Gen. Counsel
**ATTORNEY GENERAL'S
OFFICE**
313 N.E. 21st Street
Oklahoma City, OK 73105

Michael Burrage
Reggie Whitten
J. Revell Parrish
WHITTEN BURRAGE
512 N. Broadway Ave., Ste. 300
Oklahoma City, OK 73102

Bradley Beckworth
Jeffrey Angelovich
Lloyd Nolan Duck, III
Brooke A. Churchman
Andrew G. Pate
Lisa Baldwin
Nathan B. Hall
NIX, PATTERSON & ROACH
512 N. Broadway Ave., Ste. 200
Oklahoma City, OK 73102

Robert Winn Cutler
Ross E Leonoudakis
NIX PATTERSON & ROACH
3600 N. Capital of Texas Hwy.
Suite B350
Austin, TX 78746

Glenn Coffee
**GLENN COFFEE &
ASSOCIATES, PLLC**
915 N. Robinson Ave.
Oklahoma City, OK 73102

*Attorneys for
Johnson &
Johnson, Janssen
Pharmaceutica,
Inc., N/K/A
Janssen
Pharmaceuticals,
Inc., and Ortho-
McNeil-Janssen
Pharmaceuticals,
Inc. N/K/A Janssen
Pharmaceuticals,
Inc.*

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

Charles C. Lifland
Jennifer D. Cardelus
Wallace M. Allan
Sabrina H. Strong
Houman Ehsan
Esteban Rodriguez
O'MELVENY & MEYERS
400 S. Hope Street, 18th Floor
Los Angeles, CA 90071

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

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

Amy R. Lucas
Lauren S. Rakow
Jessica L. Waddle
O'MELVENY & MEYERS
1999 Ave. of the Stars, 8th Fl.
Los Angeles, CA 90067

Jeffrey A. Barker
O'MELVENY & MEYERS
610 Newport Center Drive
Newport Beach, CA 92660

Larry D. Ottaway
Amy Sherry Fischer
Andrew Bowman
Jordyn L. Cartmell
**FOLIART, HUFF, OTTAWAY &
BOTTOM**
201 Robert S. Kerr Avenue, 12th Fl.
Oklahoma City, OK 73102

**Attorneys for
Purdue Pharma,
LP,
Purdue Pharma,
Inc. and The
Purdue Frederick
Company**

Sheila L. Birnbaum
Mark S. Cheffo
Hayden Adam Coleman
Paul LaFata
Jonathan S. Tam
Lindsay N. Zanello
Bert L. Wolff
Mara C. Cusker Gonzalez
DECHERT, LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036

William W. Oxley
DECHERT LLP
U.S. Bank Tower
633 West 5th Street, Suite 4900
Los Angeles, CA 90071

Britta E. Stanton
John D. Volney
John T. Cox, III
Eric W. Pinker
Jared D. Eisenberg
Jervonne D. Newsome
Ruben A. Garcia
Russell Guy Herman
Samuel Butler Hardy, IV
**LYNN PINKER COX &
HURST, LLP**
2100 Ross Avenue, Suite 2700
Dallas, TX 75201

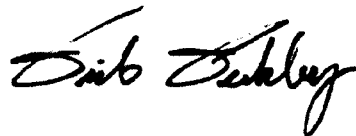
Erik W. Snapp
DECHERT, LLP
35 West Wacker Drive, Ste. 3400
Chicago, IL 60601

Benjamin F. McAnaney
Hope S. Freiwald
Will W. Sachse
DECHERT, LLP
2929 Arch Street
Philadelphia, PA 19104

Jonathan S. Tam
Jae Hong Lee
DECHERT, LLP
One Bush Street, 16th Floor
San Francisco, CA 94104

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

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



Nick Merkley

EXHIBIT A

<u>TOPIC #</u>	<u>TOPIC DESCRIPTION</u>
6	The nature and circumstances regarding any prescription of any Opioid manufactured by any Teva Defendant, including Actiq and Fentora, that the State contends caused it harm and for which it is seeking to recover damages in this lawsuit.
7	For each prescription identified in response to Topic No. 6, whether or not the prescription was reimbursed by Plaintiff and if so, the circumstances surrounding the coverage decision.
9	Any allegedly false or fraudulent claims that were submitted for payment to the Oklahoma Medicaid Program (or any other of Your Programs) that the State seeks to attribute to (a) Cephalon; (b) Teva USA; (c) Watson; (d) Actavis LLC; and/or (e) Actavis Pharma.
36	Identification of and the circumstances behind all “unnecessary” or “excessive” prescriptions within the 245 prescriptions identified in paragraph 37 and Exhibit 3 of the Petition, including, but not limited to, the factual basis for alleging the prescription w “unnecessary or excessive” for each prescription.
37	The factual bases supporting Your claim that each of the Teva Defendants “knowingly caused to be presented false or fraudulent claim for payment by Oklahoma Medicaid by marketing their drugs in a manner aimed at downplaying the risks of opioids (specifically the risks of addiction and abuse), overstating their efficacy, and thus, wrongly increasing the number of prescriptions made to Oklahoma Medicaid patients,” as alleged in paragraph 75 of the Petition.

**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.

Case No. CJ-2017-816
Honorable Thad Balkman

William C. Hetherington
Special Discovery Master

**NOTICE TO TAKE SECTION 3230(C)(5) VIDEOTAPED DEPOSITION OF
CORPORATE REPRESENTATIVE(S) OF THE STATE**

To: State of Oklahoma

Via Electronic Mail

Bradley Beckworth
Jeffrey Angelovich
Lloyd Nolan Duck, III
Brooke A. Churchman
Andrew G. Pate
Lisa Baldwin
Nathan B. Hall
NIX PATTERSON, LLP
512 N. Broadway Ave., Ste. 200
Oklahoma City, OK 73102

Robert Winn Cutler
Ross E Leonoudakis
NIX PATTERSON & ROACH
3600 N. Capital of Texas Hwy, Ste. B350
Austin, TX 78746

Michael Burrage
Reggie Whitten
J. Revell Parrish
WHITTEN BURRAGE
512 N. Broadway Ave., Ste. 300
Oklahoma City, OK 73102

Mike Hunter
Abby Dillsaver
Ethan Shaner
ATTORNEY GENERAL'S OFFICE
313 N.E. 21st Street
Oklahoma City, OK 73102

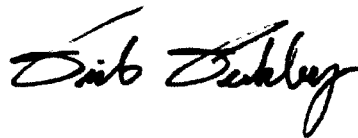
Glenn Coffee
Glenn Coffee & Associates, PLLC
915 North Robinson Avenue
Oklahoma City, OK 73102

Please take notice that, pursuant to 12 O.S. § 3230(C), Defendants Teva Pharmaceuticals USA, Inc., Cephalon, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc. (collectively, "Teva Defendants") will take the deposition upon oral examination of one or more corporate representative(s) of Plaintiff the State of Oklahoma (the "State") on the matters described in **Exhibit A** on **March 7, 2019, starting at 9:00 AM**, at the offices of Whitten Burrage, 512 North Broadway Avenue, Suite 300, Oklahoma City, Oklahoma 73102.

This deposition is to be used as evidence in the trial of the above action, and the deposition will be taken before an officer authorized by law to administer oaths. It will be recorded by stenographic means and will be videotaped. It will continue from day to day until completed.

Pursuant to 12 O.S. § 3230(C)(5), the State is hereby notified of its obligation to designate one or more officers, directors, managing agents, or other persons who consent to testify on the State's behalf about all matters described in **Exhibit A**. Please take further notice that each such officer, director, managing agent, or other person produced by the State to testify under 12 O.S. § 3230(C)(5) has an affirmative duty to have first reviewed all documents, reports, and other matters known or reasonably available to the State, and spoken to all potential witnesses known or reasonably available to the State, in order to provide informed and binding answers at the deposition(s).

DATED: February 20, 2019.



Robert G. McCampbell, OBA No. 10390
Nicholas ("Nick") V. Merkley, OBA No. 20284
Jeffrey A. Curran, OBA No. 12255
Ashley E. Quinn, OBA No. 33251
GABLEGOTWALS
One Leadership Square, 15th Fl.

211 North Robinson
Oklahoma City, OK 73102-7255
T: +1.405.235.3314
E-mail: RMcCampbell@Gablelaw.com
E-mail: NMerkley@Gablelaw.com
E-mail: JCurran@Gablelaw.com
E-mail: AQuinn@Gablelaw.com

OF COUNSEL:

Steven A. Reed
Harvey Bartle IV
Mark A. Fiore
Rebecca Hillyer
Nancy L. Patterson

MORGAN, LEWIS & BOCKIUS LLP

1701 Market Street
Philadelphia, PA 19103-2921
T: +1.215.963.5000
E-mail: steven.reed@morganlewis.com
E-mail: harvey.bartle@morganlewis.com
E-mail: mark.fiore@morganlewis.com
E-mail: rebecca.hillyer@morganlewis.com
E-mail: nancy.patterson@morganlewis.com

Brian M. Ercole
Melissa M. Coates
Martha A. Leibell

MORGAN, LEWIS & BOCKIUS LLP

200 S. Biscayne Blvd., Suite 5300
Miami, FL 33131
T: +1.305.415.3000
E-mail: brian.ercole@morganlewis.com
E-mail: melissa.coates@morganlewis.com
Email: martha.leibell@morganlewis.com

*Attorneys for Defendants Cephalon, Inc., Teva
Pharmaceuticals USA, Inc., Watson Laboratories,
Inc., Actavis LLC, and Actavis Pharma, Inc. f/k/a
Watson Pharma, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was emailed this 20th day of February, 2019, to the following:

***Attorneys for
Plaintiff***

Mike Hunter, Attorney General
Abby Dillsaver, General Counsel
Ethan Shaner, Dep. Gen. Counsel
**ATTORNEY GENERAL'S
OFFICE**
313 N.E. 21st Street
Oklahoma City, OK 73105

Michael Burrage
Reggie Whitten
J. Revell Parrish
WHITTEN BURRAGE
512 N. Broadway Ave., Ste. 300
Oklahoma City, OK 73102

Bradley Beckworth
Jeffrey Angelovich
Lloyd Nolan Duck, III
Brooke A. Churchman
Andrew G. Pate
Lisa Baldwin
Nathan B. Hall
NIX, PATTERSON & ROACH
512 N. Broadway Ave., Ste. 200
Oklahoma City, OK 73102

Robert Winn Cutler
Ross E Leonoudakis
NIX PATTERSON & ROACH
3600 N. Capital of Texas Hwy.
Suite B350
Austin, TX 78746

Glenn Coffee
**GLENN COFFEE &
ASSOCIATES, PLLC**
915 N. Robinson Ave.
Oklahoma City, OK 73102

*Attorneys for
Johnson &
Johnson, Janssen
Pharmaceutica,
Inc., N/K/A
Janssen
Pharmaceuticals,
Inc., and Ortho-
McNeil-Janssen
Pharmaceuticals,
Inc. N/K/A Janssen
Pharmaceuticals,
Inc.*

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

Charles C. Lifland
Jennifer D. Cardelus
Wallace M. Allan
Sabrina H. Strong
Houman Ehsan
Esteban Rodriguez
O'MELVENY & MEYERS
400 S. Hope Street, 18th Floor
Los Angeles, CA 90071

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

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

Amy R. Lucas
Lauren S. Rakow
Jessica L. Waddle
O'MELVENY & MEYERS
1999 Ave. of the Stars, 8th Fl.
Los Angeles, CA 90067

Jeffrey A. Barker
O'MELVENY & MEYERS
610 Newport Center Drive
Newport Beach, CA 92660

Larry D. Ottaway
Amy Sherry Fischer
Andrew Bowman
Jordyn L. Cartmell
**FOLIART, HUFF, OTTAWAY &
BOTTOM**
201 Robert S. Kerr Avenue, 12th Fl.
Oklahoma City, OK 73102

*Attorneys for
Purdue Pharma,
LP,
Purdue Pharma,
Inc. and The
Purdue Frederick
Company*

Sheila L. Birnbaum
Mark S. Cheffo
Hayden Adam Coleman
Paul LaFata
Jonathan S. Tam
Lindsay N. Zanello
Bert L. Wolff
Mara C. Cusker Gonzalez
DECHERT, LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036

William W. Oxley
DECHERT LLP
U.S. Bank Tower
633 West 5th Street, Suite 4900
Los Angeles, CA 90071

Britta E. Stanton
John D. Volney
John T. Cox, III
Eric W. Pinker
Jared D. Eisenberg
Jervonne D. Newsome
Ruben A. Garcia
Russell Guy Herman
Samuel Butler Hardy, IV
**LYNN PINKER COX &
HURST, LLP**
2100 Ross Avenue, Suite 2700
Dallas, TX 75201

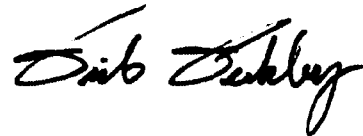
Erik W. Snapp
DECHERT, LLP
35 West Wacker Drive, Ste. 3400
Chicago, IL 60601

Benjamin F. McAnaney
Hope S. Freiwald
Will W. Sachse
DECHERT, LLP
2929 Arch Street
Philadelphia, PA 19104

Jonathan S. Tam
Jae Hong Lee
DECHERT, LLP
One Bush Street, 16th Floor
San Francisco, CA 94104

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

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



Nick Merkley

EXHIBIT A

<u>TOPIC #</u>	<u>TOPIC DESCRIPTION</u>
14	The nature of and factual basis for the relief requested by the State in the Petition against each of the Teva Defendants.
21	The State's annual budget during the Relevant Time Period, including the portion of each year's budget dedicated to costs allegedly caused by prescription Opioids and the portion of each year's budget dedicated to preventing or mitigating the "Opioid Epidemic" (as that term is used in the Petition).
22	The source(s) of the State's budget revenues, including any funding that were specifically allocated to reacting to, combating, treating, assessing, or otherwise specifically addressing prescription Opioid diversion, abuse, or addiction.
34	Your understanding of the causes of the "Opioid Epidemic" (as that term is used in Plaintiff's Petition).
35	Efforts to comply with Defendants' Requests for Production of Documents, Requests for Admission, and/or Interrogatories.

**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.

Case No. CJ-2017-816
Honorable Thad Balkman

William C. Hetherington
Special Discovery Master

**NOTICE TO TAKE SECTION 3230(C)(5) VIDEOTAPED DEPOSITION OF
CORPORATE REPRESENTATIVE(S) OF THE STATE**

To: State of Oklahoma

Via Electronic Mail

Bradley Beckworth
Jeffrey Angelovich
Lloyd Nolan Duck, III
Brooke A. Churchman
Andrew G. Pate
Lisa Baldwin
Nathan B. Hall
NIX PATTERSON, LLP
512 N. Broadway Ave., Ste. 200
Oklahoma City, OK 73102

Robert Winn Cutler
Ross E Leonoudakis
NIX PATTERSON & ROACH
3600 N. Capital of Texas Hwy, Ste. B350
Austin, TX 78746

Michael Burrage
Reggie Whitten
J. Revell Parrish
WHITTEN BURRAGE
512 N. Broadway Ave., Ste. 300
Oklahoma City, OK 73102

Mike Hunter
Abby Dillsaver
Ethan Shaner
ATTORNEY GENERAL'S OFFICE
313 N.E. 21st Street
Oklahoma City, OK 73102

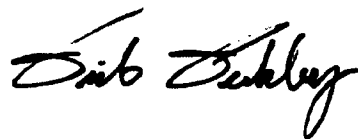
Glenn Coffee
Glenn Coffee & Associates, PLLC
915 North Robinson Avenue
Oklahoma City, OK 73102

Please take notice that, pursuant to 12 O.S. § 3230(C), Defendants Teva Pharmaceuticals USA, Inc., Cephalon, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc. (collectively, "Teva Defendants") will take the deposition upon oral examination of one or more corporate representative(s) of Plaintiff the State of Oklahoma (the "State") on the matters described in **Exhibit A** on **March 11, 2019, starting at 9:00 AM**, at the offices of Whitten Burrage, 512 North Broadway Avenue, Suite 300, Oklahoma City, Oklahoma 73102.

This deposition is to be used as evidence in the trial of the above action, and the deposition will be taken before an officer authorized by law to administer oaths. It will be recorded by stenographic means and will be videotaped. It will continue from day to day until completed.

Pursuant to 12 O.S. § 3230(C)(5), the State is hereby notified of its obligation to designate one or more officers, directors, managing agents, or other persons who consent to testify on the State's behalf about all matters described in **Exhibit A**. Please take further notice that each such officer, director, managing agent, or other person produced by the State to testify under 12 O.S. § 3230(C)(5) has an affirmative duty to have first reviewed all documents, reports, and other matters known or reasonably available to the State, and spoken to all potential witnesses known or reasonably available to the State, in order to provide informed and binding answers at the deposition(s).

DATED: February 20, 2019.



Robert G. McCampbell, OBA No. 10390
Nicholas ("Nick") V. Merkley, OBA No. 20284
Jeffrey A. Curran, OBA No. 12255
Ashley E. Quinn, OBA No. 33251
GABLEGOTWALS
One Leadership Square, 15th Fl.

211 North Robinson
Oklahoma City, OK 73102-7255
T: +1.405.235.3314
E-mail: RMcCampbell@Gablelaw.com
E-mail: NMerkeley@Gablelaw.com
E-mail: JCurran@Gablelaw.com
E-mail: AQuinn@Gablelaw.com

OF COUNSEL:

Steven A. Reed
Harvey Bartle IV
Mark A. Fiore
Rebecca Hillyer
Nancy L. Patterson

MORGAN, LEWIS & BOCKIUS LLP

1701 Market Street
Philadelphia, PA 19103-2921
T: +1.215.963.5000
E-mail: steven.reed@morganlewis.com
E-mail: harvey.bartle@morganlewis.com
E-mail: mark.fiore@morganlewis.com
E-mail: rebecca.hillyer@morganlewis.com
E-mail: nancy.patterson@morganlewis.com

Brian M. Ercole
Melissa M. Coates
Martha A. Leibell
MORGAN, LEWIS & BOCKIUS LLP
200 S. Biscayne Blvd., Suite 5300
Miami, FL 33131
T: +1.305.415.3000
E-mail: brian.ercole@morganlewis.com
E-mail: melissa.coates@morganlewis.com
Email: martha.leibell@morganlewis.com

*Attorneys for Defendants Cephalon, Inc., Teva
Pharmaceuticals USA, Inc., Watson Laboratories,
Inc., Actavis LLC, and Actavis Pharma, Inc. f/k/a
Watson Pharma, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was emailed this 20th day of February, 2019, to the following:

***Attorneys for
Plaintiff***

Mike Hunter, Attorney General
Abby Dillsaver, General Counsel
Ethan Shaner, Dep. Gen. Counsel
**ATTORNEY GENERAL'S
OFFICE**
313 N.E. 21st Street
Oklahoma City, OK 73105

Michael Burrage
Reggie Whitten
J. Revell Parrish
WHITTEN BURRAGE
512 N. Broadway Ave., Ste. 300
Oklahoma City, OK 73102

Bradley Beckworth
Jeffrey Angelovich
Lloyd Nolan Duck, III
Brooke A. Churchman
Andrew G. Pate
Lisa Baldwin
Nathan B. Hall
NIX, PATTERSON & ROACH
512 N. Broadway Ave., Ste. 200
Oklahoma City, OK 73102

Robert Winn Cutler
Ross E Leonoudakis
NIX PATTERSON & ROACH
3600 N. Capital of Texas Hwy.
Suite B350
Austin, TX 78746

Glenn Coffee
**GLENN COFFEE &
ASSOCIATES, PLLC**
915 N. Robinson Ave.
Oklahoma City, OK 73102

<p><i>Attorneys for Johnson & Johnson, Janssen Pharmaceutica, Inc., N/K/A Janssen Pharmaceuticals, Inc., and Ortho- McNeil-Janssen Pharmaceuticals, Inc. N/K/A Janssen Pharmaceuticals, Inc.</i></p>	<p>John H. Sparks Benjamin H. Odom Michael W. Ridgeway David L. Kinney ODOM SPARKS & JONES 2500 McGee Drive, Suite 140 Norman, OK 73072</p>	<p>Charles C. Lifland Jennifer D. Cardelus Wallace M. Allan Sabrina H. Strong Houman Ehsan Esteban Rodriguez O'MELVENY & MEYERS 400 S. Hope Street, 18th Floor Los Angeles, CA 90071</p>
	<p>Stephen D. Brody David Roberts O'MELVENY & MEYERS 1625 Eye Street NW Washington, DC 20006</p>	<p>Daniel J. Franklin Ross B Galin Desirae Krislie Cubero Tongco O'MELVENY & MEYERS 7 Times Square New York, NY 10036</p>
	<p>Amy R. Lucas Lauren S. Rakow Jessica L. Waddle O'MELVENY & MEYERS 1999 Ave. of the Stars, 8th Fl. Los Angeles, CA 90067</p>	<p>Jeffrey A. Barker O'MELVENY & MEYERS 610 Newport Center Drive Newport Beach, CA 92660</p>
	<p>Larry D. Ottaway Amy Sherry Fischer Andrew Bowman Jordyn L. Cartmell FOLIART, HUFF, OTTAWAY & BOTTOM 201 Robert S. Kerr Avenue, 12th Fl. Oklahoma City, OK 73102</p>	

*Attorneys for
Purdue Pharma,
LP,
Purdue Pharma,
Inc. and The
Purdue Frederick
Company*

Sheila L. Birnbaum
Mark S. Cheffo
Hayden Adam Coleman
Paul LaFata
Jonathan S. Tam
Lindsay N. Zanello
Bert L. Wolff
Mara C. Cusker Gonzalez
DECHERT, LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036

William W. Oxley
DECHERT LLP
U.S. Bank Tower
633 West 5th Street, Suite 4900
Los Angeles, CA 90071

Erik W. Snapp
DECHERT, LLP
35 West Wacker Drive, Ste. 3400
Chicago, IL 60601

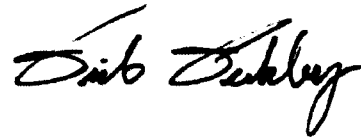
Benjamin F. McAnaney
Hope S. Freiwald
Will W. Sachse
DECHERT, LLP
2929 Arch Street
Philadelphia, PA 19104

Jonathan S. Tam
Jae Hong Lee
DECHERT, LLP
One Bush Street, 16th Floor
San Francisco, CA 94104

Britta E. Stanton
John D. Volney
John T. Cox, III
Eric W. Pinker
Jared D. Eisenberg
Jervonne D. Newsome
Ruben A. Garcia
Russell Guy Herman
Samuel Butler Hardy, IV
**LYNN PINKER COX &
HURST, LLP**
2100 Ross Avenue, Suite 2700
Dallas, TX 75201

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

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



Nick Merkley

EXHIBIT A

<u>TOPIC #</u>	<u>TOPIC DESCRIPTION</u>
24	Communications between the State and any Teva Defendant regarding prescription Opioids.
25	Communications between the State and any resident of Oklahoma regarding Opioid abuse including any communications regarding the promotion, marketing, or overprescribing of Opioid prescriptions for which the State seeks damages.
26	Communications between the State and any Healthcare Provider regarding the promotion, marketing, prescribing, or reimbursement of Actiq, Fentora, or any prescription Opioid manufactured by any Teva Defendant or their efficacy.
27	Communications between the State and any third-party insurer, payor, or pharmacy benefits manager related to prescription Opioids, including Actiq or Fentora.

**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.

Case No. CJ-2017-816
Honorable Thad Balkman

William C. Hetherington
Special Discovery Master

**NOTICE TO TAKE SECTION 3230(C)(5) VIDEOTAPED DEPOSITION OF
CORPORATE REPRESENTATIVE(S) OF THE STATE**

To: State of Oklahoma

Via Electronic Mail

Bradley Beckworth
Jeffrey Angelovich
Lloyd Nolan Duck, III
Brooke A. Churchman
Andrew G. Pate
Lisa Baldwin
Nathan B. Hall
NIX PATTERSON, LLP
512 N. Broadway Ave., Ste. 200
Oklahoma City, OK 73102

Robert Winn Cutler
Ross E Leonoudakis
NIX PATTERSON & ROACH
3600 N. Capital of Texas Hwy, Ste. B350
Austin, TX 78746

Michael Burrage
Reggie Whitten
J. Revell Parrish
WHITTEN BURRAGE
512 N. Broadway Ave., Ste. 300
Oklahoma City, OK 73102

Mike Hunter
Abby Dillsaver
Ethan Shaner
ATTORNEY GENERAL'S OFFICE
313 N.E. 21st Street
Oklahoma City, OK 73102

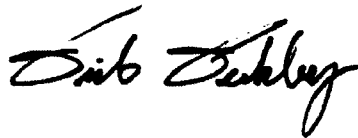
Glenn Coffee
Glenn Coffee & Associates, PLLC
915 North Robinson Avenue
Oklahoma City, OK 73102

Please take notice that, pursuant to 12 O.S. § 3230(C), Defendants Teva Pharmaceuticals USA, Inc., Cephalon, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc. (collectively, "Teva Defendants") will take the deposition upon oral examination of one or more corporate representative(s) of Plaintiff the State of Oklahoma (the "State") on the matters described in **Exhibit A** on **March 13, 2019, starting at 9:00 AM**, at the offices of Whitten Burrage, 512 North Broadway Avenue, Suite 300, Oklahoma City, Oklahoma 73102.

This deposition is to be used as evidence in the trial of the above action, and the deposition will be taken before an officer authorized by law to administer oaths. It will be recorded by stenographic means and will be videotaped. It will continue from day to day until completed.

Pursuant to 12 O.S. § 3230(C)(5), the State is hereby notified of its obligation to designate one or more officers, directors, managing agents, or other persons who consent to testify on the State's behalf about all matters described in **Exhibit A**. Please take further notice that each such officer, director, managing agent, or other person produced by the State to testify under 12 O.S. § 3230(C)(5) has an affirmative duty to have first reviewed all documents, reports, and other matters known or reasonably available to the State, and spoken to all potential witnesses known or reasonably available to the State, in order to provide informed and binding answers at the deposition(s).

DATED: February 20, 2019.



Robert G. McCampbell, OBA No. 10390
Nicholas ("Nick") V. Merkley, OBA No. 20284
Jeffrey A. Curran, OBA No. 12255
Ashley E. Quinn, OBA No. 33251
GABLEGOTWALS
One Leadership Square, 15th Fl.

211 North Robinson
Oklahoma City, OK 73102-7255
T: +1.405.235.3314
E-mail: RMcCampbell@Gablelaw.com
E-mail: NMerkeley@Gablelaw.com
E-mail: JCurran@Gablelaw.com
E-mail: AQuinn@Gablelaw.com

OF COUNSEL:

Steven A. Reed
Harvey Bartle IV
Mark A. Fiore
Rebecca Hillyer
Nancy L. Patterson

MORGAN, LEWIS & BOCKIUS LLP

1701 Market Street
Philadelphia, PA 19103-2921
T: +1.215.963.5000
E-mail: steven.reed@morganlewis.com
E-mail: harvey.bartle@morganlewis.com
E-mail: mark.fiore@morganlewis.com
E-mail: rebecca.hillyer@morganlewis.com
E-mail: nancy.patterson@morganlewis.com

Brian M. Ercole
Melissa M. Coates
Martha A. Leibell
MORGAN, LEWIS & BOCKIUS LLP
200 S. Biscayne Blvd., Suite 5300
Miami, FL 33131
T: +1.305.415.3000
E-mail: brian.ercole@morganlewis.com
E-mail: melissa.coates@morganlewis.com
Email: martha.leibell@morganlewis.com

*Attorneys for Defendants Cephalon, Inc., Teva
Pharmaceuticals USA, Inc., Watson Laboratories,
Inc., Actavis LLC, and Actavis Pharma, Inc. f/k/a
Watson Pharma, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was emailed this 20th day of February, 2019, to the following:

<i>Attorneys for Plaintiff</i>	Mike Hunter, Attorney General Abby Dillsaver, General Counsel Ethan Shaner, Dep. Gen. Counsel ATTORNEY GENERAL'S OFFICE 313 N.E. 21st Street Oklahoma City, OK 73105	Michael Burrage Reggie Whitten J. Revell Parrish WHITTEN BURRAGE 512 N. Broadway Ave., Ste. 300 Oklahoma City, OK 73102
	Bradley Beckworth Jeffrey Angelovich Lloyd Nolan Duck, III Brooke A. Churchman Andrew G. Pate Lisa Baldwin Nathan B. Hall NIX, PATTERSON & ROACH 512 N. Broadway Ave., Ste. 200 Oklahoma City, OK 73102	Robert Winn Cutler Ross E Leonoudakis NIX PATTERSON & ROACH 3600 N. Capital of Texas Hwy. Suite B350 Austin, TX 78746
	Glenn Coffee GLENN COFFEE & ASSOCIATES, PLLC 915 N. Robinson Ave. Oklahoma City, OK 73102	

*Attorneys for
Johnson &
Johnson, Janssen
Pharmaceutica,
Inc., N/K/A
Janssen
Pharmaceuticals,
Inc., and Ortho-
McNeil-Janssen
Pharmaceuticals,
Inc. N/K/A Janssen
Pharmaceuticals,
Inc.*

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

Charles C. Lifland
Jennifer D. Cardelus
Wallace M. Allan
Sabrina H. Strong
Houman Ehsan
Esteban Rodriguez
O'MELVENY & MEYERS
400 S. Hope Street, 18th Floor
Los Angeles, CA 90071

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

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

Amy R. Lucas
Lauren S. Rakow
Jessica L. Waddle
O'MELVENY & MEYERS
1999 Ave. of the Stars, 8th Fl.
Los Angeles, CA 90067

Jeffrey A. Barker
O'MELVENY & MEYERS
610 Newport Center Drive
Newport Beach, CA 92660

Larry D. Ottaway
Amy Sherry Fischer
Andrew Bowman
Jordyn L. Cartmell
**FOLIART, HUFF, OTTAWAY &
BOTTOM**
201 Robert S. Kerr Avenue, 12th Fl.
Oklahoma City, OK 73102

*Attorneys for
Purdue Pharma,
LP,
Purdue Pharma,
Inc. and The
Purdue Frederick
Company*

Sheila L. Birnbaum
Mark S. Cheffo
Hayden Adam Coleman
Paul LaFata
Jonathan S. Tam
Lindsay N. Zanello
Bert L. Wolff
Mara C. Cusker Gonzalez
DECHERT, LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036

William W. Oxley
DECHERT LLP
U.S. Bank Tower
633 West 5th Street, Suite 4900
Los Angeles, CA 90071

Britta E. Stanton
John D. Volney
John T. Cox, III
Eric W. Pinker
Jared D. Eisenberg
Jervonne D. Newsome
Ruben A. Garcia
Russell Guy Herman
Samuel Butler Hardy, IV
**LYNN PINKER COX &
HURST, LLP**
2100 Ross Avenue, Suite 2700
Dallas, TX 75201

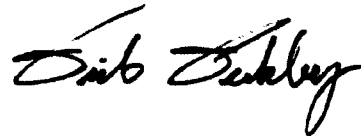
Erik W. Snapp
DECHERT, LLP
35 West Wacker Drive, Ste. 3400
Chicago, IL 60601

Benjamin F. McAnaney
Hope S. Freiwald
Will W. Sachse
DECHERT, LLP
2929 Arch Street
Philadelphia, PA 19104

Jonathan S. Tam
Jae Hong Lee
DECHERT, LLP
One Bush Street, 16th Floor
San Francisco, CA 94104

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

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



Nick Merkley

EXHIBIT A

<u>TOPIC #</u>	<u>TOPIC DESCRIPTION</u>
15	The State's efforts to mitigate any harm or damages that the State alleges was caused by each of the Teva Defendants in this litigation, including, but not limited to, actions to prevent Opioid diversion, to limit the prescribing of prescription Opioids, to prevent or treat Opioid abuse, and to prosecute or otherwise sanction persons contributing to the problem.
18	Rules, regulations, ordinances, legislation, policies, or guidelines (and changes thereto over time) in Oklahoma related to Opioids during the Relevant Time Period.
19	The use and abuse in Oklahoma of controlled or regulated substances other than prescription Opioids.
23	Any taskforce, program, working group, committee, or other organization designed to address Opioid prescribing, promotion, marketing, distribution, diversion, use, and/or misuse.

EXHIBIT 2

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

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 FEBRUARY 14, 2019
AT THE CLEVELAND COUNTY COURTHOUSE
BEFORE THE HONORABLE THAD BALKMAN, DISTRICT JUDGE
AND WILLIAM C. HETHERINGTON, JR.,
RETIRED ACTIVE JUDGE AND SPECIAL DISCOVERY MASTER**

REPORTED BY: ANGELA THAGARD, CSR, RPR

1 State has done to address the opioid epidemic.

2 What I'm looking for is what the State says Teva has done
3 to cause the opioid epidemic. Two totally separate things.
4 Teva's entitled to know, as a matter of fundamental fairness
5 and due process, what is the State saying we did outside of
6 conclusory allegations in a petition. We're entitled to take
7 discovery on that. We have to take discovery on it.

8 THE COURT: Thank you.

9 A lot's been said about the fact that, you know, this is
10 an appeal, basically, of an order by the discovery master. And
11 you know, certainly, we can all agree that Judge Hetherington
12 has a lot more time invested in these matters.

13 I do have the benefit of reviewing those transcripts. I
14 won't say I've read them all word for word, but I've reviewed a
15 lot of them and certainly you all cite them in your briefs and
16 I have the benefit of discussing those matters with you and
17 with Judge Hetherington.

18 My recollection is that the discovery master has said that
19 if there are specific topics that arise as discovery unfolds,
20 then the decision on limiting these depositions would be
21 reconsidered, and that's what we're here on today.

22 It's my understanding in these matters that I think it's
23 consistent with previous rulings, previous orders from Judge
24 Hetherington in the scope of discovery that Teva be allowed
25 limited depositions.

1 I'm prepared to allow them to go forward with those
2 notices on new topics, so long as they don't overlap, they're
3 not duplicative. I would like to limit those to four hours,
4 and that would be exclusive of cross-examination. And those
5 would need to be completed by March 15th.

6 MR. MERKLEY: Thank you, Judge.

7 THE COURT: Okay.

8 MR. DUCK: Just for clarity, Judge, we'll receive a
9 new notice, new topics from Teva, so we can look at what they
10 want to do?

11 THE COURT: Yes.

12 MR. DUCK: Thank you.

13 MR. MERKLEY: But just to be clear, if it's going to
14 be the topics that we've already -- we'll renotece them for
15 dates and stuff --

16 THE COURT: Just renotece them.

17 MR. MERKLEY: It's going to be the same topics we've
18 addressed. I don't want to start the meet and confer and have
19 another hearing process over again so that we don't get to do
20 this by March 15th.

21 THE COURT: Yes.

22 MR. MERKLEY: Thank you.

23 THE COURT: Okay.

24 MR. DUCK: Well, I'm still confused. I'm sorry. I
25 mean, you said new topics which don't overlap that are limited.

1 My understanding is the current notice has been found to be
2 overlapping and unlimited. So do we get a new notice that has
3 more limited topics than the ones they've already -- I mean, I
4 just don't want to get the same notice again.

5 THE COURT: Sure.

6 Mr. Merkley, what I heard you say here this morning in the
7 courtroom is that you're not going to simply ask for
8 depositions on topics that have already been covered; that
9 you're seeking information specific to Teva. Is that correct?

10 MR. MERKLEY: That's correct.

11 THE COURT: Okay. So I would expect that those
12 deposition notices would reflect what you've represented here
13 in court this morning.

14 MR. MERKLEY: That's correct, and I'm happy to do
15 that. What I just want to make clear is when I do do that,
16 we're going to set the depositions and go forward; we're not
17 going to start a three-day meet and confer process, another
18 week hearing with Judge Hetherington, and start that process
19 all over again, because we only have four weeks.

20 And I think I'm hearing the State saying we don't have to
21 do that and they will agree to sit this witness once I revise
22 and send out individual notices, but I want to make that clear
23 on the record so that we're not back here doing this again on
24 March 14th, one day before the 15th.

25 THE COURT: Well, I would hope that you all can meet

1 and confer on that, but I don't think it's proper to
2 automatically extinguish any side's right to complain or to
3 bring up something if they think they do need to bring it to
4 the discovery master. I'm not inviting that or encouraging
5 that, but I don't think I can just say, no, the State has to
6 just take whatever they get.

7 If they have a good faith reason to believe that it
8 violates a previous ruling, then I suspect that they would be
9 able to bring that to the discovery master.

10 MR. MERKLEY: Fair enough, Judge. I'll do my very
11 best to make sure there's no violation.

12 THE COURT: Thank you, Mr. Merkley.

13 MR. DUCK: Thank you, Judge.

14 THE COURT: Mr. McCampbell?

15 MR. MCCAMPBELL: Yes, your Honor. We have -- if the
16 Court's done with the motions that are set, we have a couple of
17 logistics things we would like to talk about in the course of
18 getting this ready?

19 THE COURT: Sure.

20 MR. MCCAMPBELL: One of the things would be hearing
21 dates with your Honor and with Judge Hetherington. The last
22 time we were here, Judge Hetherington brought up the idea there
23 could be additional hearing dates scheduled. I remember
24 March 4 was one of the dates he said. I don't know if that
25 date is still available.