

IN THE DISTRICT COURT STATE OF DKLAHOMA

STATE OF OKLAHOMA EX PANNIK HUNTER, ATTORNEY GUNERAFUN OKLAHOMA.

Case No. CJ-2017-816

Plaintiff.

PURDUE PHARMA L.P., et about

v.

of Thonorstone Thad Balkman

In the One

TO BE HEARD BY

William C. Hetherington
Special Discovery Master

Defendants.

DEFENDANTS' EMERGENCY MOTION TO STAY EXPERT DEADLINES PENDING A RULING ON CONCURRENT MOTION FOR CONTINUANCE

Defendants respectfully request on an emergency basis that the Court stay the parties' expert deadlines to preserve the status quo while the Court rules on Defendants' motion for continuance, which is being filed concurrently. (See Exhibit A.)

As shown in that motion, just last week, the State *nearly doubled* the volume of all its prior document productions – with a last-minute dump of *1,596,369* pages of documents, which is so large that it took several days to download and process. And more are coming. For instance, within the last few days alone, the State has produced more than 8,500 pages of other documents – not including other document productions that continue to be rolled out by the State as of the time of this writing. This belated tidal wave of documents comes despite this Court's prior orders compelling the State to produce its documents long ago. Among other things, it is contrary to the Court's January 17, 2019 order compelling the State "to *complete* the required discovery and production on or before February 5, 2019" (Jan. 17, 2019 Hr'g Order at 7 (emphasis added).) It is also contrary to the Court's frequent directives to produce custodial file documents before depositions – many of which have already occurred. The prejudice to Defendants from the State's conduct is substantial, as shown in the motion for a continuance.

Emergency relief is necessary because the deadline for Defendants to issue expert disclosures is tomorrow, which is just six working days from when the State dumped more than 1.59 million pages of its documents. The State's actions deprived Defendants of any fair opportunity for its counsel or its experts to consider 1.59 million pages of the State's document production before making expert disclosures and deprived Defendants of using the State's documents to prepare for both fact and expert depositions.

While the Court rules on Defendants' motion for a continuance, the Court should prevent further prejudice to Defendants by suspending the March 1, 2019 deadline to make expert disclosures and the April 1, 2019 deadline to depose Plaintiffs' experts. These dates can then be reset upon ruling on the motion for a continuance to address the prejudice to Defendants from the State's conduct.

Date: February 28, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2019, I caused a true and correct copy of the following:

DEFENDANTS' EMERGENCY MOTION TO STAY EXPERT DEADLINES PENDING A RULING ON CONCURRENT MOTION FOR CONTINUANCE

to be served via email upon the counsel of record listed on the attached Service List.

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EXHIBIT A

IN THE DISTRICT COURT OF CLEVELAND COUNTY STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel., MIKE HUNTER, ATTORNEY GENERAL OF)
OKLAHOMA,	Case No. CJ-2017-816
Plaintiff,	Honorable Thad Balkman
v.	\(\)
PURDUE PHARMA L.P., et al.,	{
Defendants	{

DEFENDANTS'MOTION FOR A CONTINUANCE

The Court needs to continue the pre-trial deadlines and trial date in this case to avoid the substantial prejudice caused by the State's discovery failings. A continuance is necessary to address this prejudice from the State's conduct. Yet it may still be possible, should the State meet its discovery obligations, to keep this case on track to be the first of the nation's opioid cases scheduled for trial even after a continuance, and Defendants propose exactly that.

Last Thursday the State produced 165,000 documents totaling almost 1.6 million pages. To put this latest production in context, it doubles the total amount of information the State has provided—enough to fill approximately 450 bankers boxes—and it appears more is yet to come. For instance, within the last two days alone, the State has produced more than 8,500 pages of other documents—not including document productions that continue to be rolled out by the State as of the time of this writing.

Had Defendants received all of these documents months ago, when they were requested, we could have reviewed and used them to examine the State's fact and expert witnesses. We could also have provided them to our experts for consideration when forming their opinions in this case.

Now, however, that opportunity is lost under the Court's current schedule. Fact discovery will close March 15. Most of the State's witnesses have already been deposed, and the other depositions will happen without the benefit of meaningful review of these documents. At the same time, expert discovery is starting. Tomorrow, the Defendants' experts have to produce reports without the benefit of these newly produced documents, and then within days sit for depositions where they could be cross-examined with those same documents. Defendants must seek emergency relief from the deadline tomorrow as a result.

Maybe this massive 11th-hour production was the result of an oversight of monumental proportions, which begs the questions of whether the State and its private attorneys did their diligence before bringing this lawsuit, and why the State failed to find these documents sooner, despite repeated requests. Or maybe this was an intentional strategy of the State's private attorneys to protect their witnesses from difficult questions that would undermine the State's claims, or to play "gotcha" with Defendants' experts. Regardless, the prejudice to Defendants is plain, and it threatens the fairness and ultimate result of any trial.

Last week's avalanche is undoubtedly not the last of the State's last-minute discovery surprises. The State has been stonewalling discovery for much of the last year, forcing Defendants to file motion after motion, resulting in several orders to compel the State to produce discovery—orders that the State ignored. For instance, the Special Discovery Master's January 17, 2019 order compelled the State "to *complete* the required discovery and production on or before February 5, 2019" for a host of long-outstanding discovery requests. (Jan. 17, 2019 Hr'g Order at 7 (emphasis added).) It still has not happened: Among other examples, on February 22, 2019, Purdue catalogued in detail many of the State's outstanding discovery deficiencies, ranging from missing custodial files for prospective witnesses in many State agencies to defined

document categories – discovery sought many months ago in letters, motion practice, and Discovery Master Orders. (Feb. 22, 2019 Ltr. from E. Ryan to D. Pate (Ex. A).) The State did not respond.

The State believes it should recover billions of dollars for prescriptions that the Healthcare Authority authorized before they were dispensed, and that the Authority decided were medically necessary before they were reimbursed. Yet the State *still* has not produced key custodial files for Healthcare Authority employees who would be subject to deposition, several of whom have been requested since last October. (*Id.* at 2-3, 5-8.) Other documents categories from the Healthcare Authority are also still missing. (*Id.* at 9-10.) Do those missing documents show that the OHCA knowingly approved these prescriptions as medically necessary, which bars the State from now claiming they were improper? Or do the missing documents show that the OHCA violated federal law and knowingly approved as "medically necessary" prescriptions that were improper? Defendants do not know, because we just got these documents and need time to review them and then pose these questions to the State's witnesses.

Similarly, only now are Defendants finally getting access to the State's records that purportedly serve as the basis for the original and revised opinions of the State's experts. How will the defense experts prepare responses that take into account this newly produced evidence, and prepare for their own depositions?

Finally, due to the State's prior failure to produce timely expert reports that comply with the Oklahoma Rules and provide the basis for the experts' opinions, Defendants are now faced with a compressed schedule for the parties to brief and this Court to consider the dispositive motions and *Daubert* challenges still to come. Under the current schedule, for example, Defendants will have to brief the challenges to the admissibility of the State's experts before

their depositions are complete. Dispositive motions are due a day before the scheduled *Daubert* hearing. By the time the motions are fully briefed and the *Daubert* hearings concluded, the Court will have two weeks to consider and decide these critical and threshold legal issues, which may eliminate or narrow the issues and evidence to be presented at any trial.

These are real concerns that go to the heart of the fairness of this proceeding. A rush to trial has always been the favored strategy of the State's private attorneys, who have weaponized the discovery process and the expedited schedule, perhaps to pressure Defendants, and perhaps because they do not want evidence that would damage their case from coming to light. Either way, this is not even-handed justice.

The State will inevitably—and loudly—accuse Defendants of delay and cite their predictions about an eventual motion for continuance. Make no mistake: this motion is the result of the State's gamesmanship and discovery abuses. The State chose not to produce 1.6 million pages of responsive documents in response to timely discovery requests and Court orders from long ago. The State chose to make that production without explanation—literally days before the end of the discovery period—and without notice, despite numerous conferences and hearings, and near-daily efforts by Defendants to communicate about discovery. The State chose to produce those documents after the depositions of most State witnesses. Put simply, the State created the discovery problems that now require a continuance

Defendants therefore respectfully request a 100-day continuance of all pretrial dates other than the close of fact discovery, with the trial rescheduled to begin September 16. This is the minimum time required to further the requirements of fairness and due process, and it would still leave this as the first opioid case scheduled for trial. During this extended period, Defendants

should be afforded the opportunity to re-open necessary discovery against the State to the full extent warranted by the State's delinquent discovery responses.

ARGUMENT

Oklahoma law permits this Court to "continue [an] action at any stage of the proceedings upon terms as may be just." Okla. Stat. Ann. tit. 12, § 667. This statute aligns with the Court's inherent power to control its docket within sound discretion. *Boston v. Buchanan*, 2003 OK 114, 89 P.3d 1034, 1044 (citing *Hambright v. City of Cleveland*, 1960 OK 184, 360 P.2d 493, 496, *Kennedy v. District Court*, 121 Mont. 320, 194 P.2d 256, 264, 2 A.L.R.2d 1050 (1948)).

The mere desire to try a case fast is not an acceptable basis to deny a continuance that is necessary to protect the rights of the parties. For decades, the Supreme Court of Oklahoma has embraced this bedrock principle: "[W]hen a trial is forced with such dispatch as to result in depriving an interested party of reasonable opportunity to prepare for trial, and secure witnesses; and the whole circumstances are such as to convince that there was an abuse of judicial discretion, it is the duty of this court to reverse." *State v. Duerkson*, 1943 OK 6, 191 Okla. 670, 132 P.2d 649, 650. This is particularly true when the amount in controversy is "substantial and the case is quite important to all who are or may be interested." *Id.* The "chief test" when considering a continuance request is "whether the grant or denial of the motion operates in the furtherance of justice." *Id.*

The Supreme Court has also overruled a trial court's refusal to grant a continuance where a plaintiff's selective refusal to waive the doctor-patient privilege until trial allowed "plaintiff to present testimony of some doctors selected by him and close the mouth of another doctor he had consulted, who might contradict him." *Herbert v. Chicago*, R.I. & P. R. Co., 1975 OK 160, 544 P.2d 898, 901. Indeed, the denial of a continuance will violate due process when it denies the

defendant the opportunity to "fully develop the facts" that are needed for a "full and complete hearing." Cent. State Cmty. Serv. v. Anderson, 2012 OK CIV APP 110, ¶ 11, 292 P.3d 36, 39. The State's massive, last minute productions have significantly prejudiced Defendants at a critical pretrial juncture, fewer than 90 days from the current start of trial –just three weeks before the close of fact discovery— and notably beyond the time when Defendants could serve any follow-up discovery implicated by the State's productions, given the 30 days provided for responses. Defendants have no ability to review all of this material within the remaining discovery period, and certainly not by tomorrow, when defendants must disclose their experts' opinions. Defendants have already lost the ability to use this evidence with most of the State's witnesses. Within a matter of a few weeks, Defendants will also lose the opportunity to cross-examine the State's experts with the very evidence upon which they relied—much of which is still being produced long after it was requested by Defendants, required by the Oklahoma Rules, and ordered by the Court, and some of which is still being withheld for no good reason.

For example, even after repeated motion practice and discovery orders, the State still refuses to produce key documents from the Oklahoma Employee Group Insurance Division (EGID). This is the agency that continues to list OxyContin as "clinically appropriate" and a "preferred brand-name medicine[]." (HealthChoice Std. Medication List at 1 (Jan. 2019) (Ex. B) (emphasis added).) Yet EGID's Chief Medical Officer testified that the State's lawyers never asked him for documents, (Lawler Dep. (Ex. C) at 144:5-11), despite Defendants' months-long requests for his custodial file. Even worse, the State's lawyers never told the Chief Medical Officer to preserve documents until just two or three months ago. (Id. at 145:15-20.) This

testimony reveals that the State has not been attending to even basic discovery duties, and this failure may have led to spoliation of evidence.¹

As another example, when the State de-identified its claims data to remove patient and physician information, it superimposed anonymized codes in the complex data productions that do not correspond to one another (as the patient and physician information would). This resulted in another emergency motion by Defendants. (Defs' Emergency Mot. to Compel, filed Feb. 12, 2019.) On February 18, 2019, Special Master Hetherington ordered the State to correct these and other defects in their database productions, but not until March 1. (Feb. 18, 2019 Hr'g Order at 4.) That is just two weeks before the close of discovery, the day expert disclosures are due, and almost 14 months after Defendants requested the data.

Also consider Defendants' expert disclosures, which are due tomorrow. The experts have no chance to review the 1.6 million pages of documents just produced, so any disclosure will not be able to take that information into account. The experts also will not have the advantage of the numerous documents the State continues to withhold, even though Defendants requested them repeatedly, and the Court ordered the State to produce them. Because of this, the defense experts may also be open to unfair criticism from the State's lawyers.

The prejudice does not end with the close of expert discovery. Due to the State's failure to comply with the expert disclosure deadline, the Court had to substantially shift the timing for expert disclosures and extend the time for expert depositions. At the same time, the trial date remains unchanged, thereby compressing and overlapping the parties' and the Court's work on

¹ In the interest of full disclosure, Purdue also notes that it recently learned a (former) discovery vendor did not properly process approximately less than 1.0% of Purdue's documents, totaling about 51,000 documents, which led to their production in some instances without track changes or comment bubbles. In the coming days, Purdue is remedying this technical glitch with a corrected production.

Daubert and summary judgment issues Defendants will have to brief Daubert before the end of expert discovery and will simultaneously have to brief dispositive motions, which are due just one day after the Daubert hearing. The Daubert issues will be far from simple, for the State's unqualified experts use unprecedented theories to claim billions of dollars in state entitlements for routine state expenditures never before claimed by the State. By the time dispositive motions are fully briefed, the Court will have only two weeks to consider them. Perhaps by then it will be apparent to the Court that the State has no case at all. But at a minimum, the dispositive and other pretrial motions surely will narrow the evidence and issues appropriate for trial. In the interest of efficiency, fairness, and to ensure an adequate appellate record, the Court should leave itself time to give these motions the consideration they are due.

CONCLUSION

This is an important case for all parties and for Oklahomans. So it is also important to do this right—to allow Defendants the opportunity to prepare a defense that accounts for the massive amounts of information just produced, and the additional information sure to come in the next two weeks. A continuance serves the interests of justice and results in a relatively short delay. The alternative is a fundamentally unfair pretrial process that is destined to end in an equally unfair trial. Defendants respectfully submit that this Court should grant the request for a continuance and extend all deadlines apart from the close of fact discovery by 100 days.

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Pharma, Inc. f/k/a/ Watson Pharma, Inc.

EXHIBIT A

LYNN PINKER COX HURST

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February 22, 2019

Mr. Drew Pate
NIX PATTERSON, LLP
3600 North Capital of Texas Highway
Building B, Suite 350
Austin, Texas 78746

Re: Deficiencies in the State's Document Production in State of Oklahoma v. Purdue Pharma L.P., et al., Case No. CJ-2017-816, pending in the District Court of Cleveland County, Oklahoma

Dear Drew:

I write to follow up on (1) my January 23, 2019 e-mail to you regarding the State's failure to produce requested custodial files; (2) the January 24, 2019 conference call that you, Trey Cox, and I had regarding fact witness depositions and custodial file productions; (3) my February 1, 2019 letter to you regarding the State's failure to provide deposition dates and custodial files for multiple witnesses; and (4) my February 14, 2019 e-mail to you requesting deposition dates, custodial files, and various other previously requested documents the State has failed to produce. I have addressed each of the outstanding issues for which we need immediate responses from the State below.

A. Repeatedly Requested Custodial Files that the State Has Not Yet Produced

Purdue has repeatedly requested the files from the State for the following custodians. I have included the dates of Purdue's requests below. The State has not yet produced files from these custodians. Note that while you have told me that your firm does not represent a few of the individuals on this list, that does not obviate the State of its obligation to gather responsive documents from these custodians. Furthermore, many of these custodians are deponents in this case and the Court has ordered the State to produce files from deponents in advance of depositions. (See 10/18/2018 Order on Purdue's Mot. to Compel Custodial Files in Advance of Depos.; 12/26/2018 Order on Purdue's Motion to Compel.) The State has not complied with those orders. Please

Page 2

produce all responsive documents that are in the following individuals' possession, custody, and control by 5:00 p.m. Central Time on March 1, 2019.

Custodian	State Agency	Dates Purdue Requested Files
Becky Pasternik-Ikard	Health Care Authority	10/30/2018 Letter
		11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
		02/14/2019 E-mail
Bob Ricks	State Bureau of Investigation	10/30/2018 Letter
		11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
Carrie Daniels	Department of Mental Health &	10/30/2018 Letter
	Substance Abuse Services	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
		02/14/2019 E-mail
Carrie Evans	Oklahoma Health Care Authority	12/18/2018 Letter
		02/01/2019 Letter
		02/14/2019 E-mail
Carrie Slatton-Hodges	Department of Mental Health & -	10/30/2018 Letter
	Substance Abuse Services	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
		01/24/2019 Conference Call
•		02/01/2019 Letter
		02/14/2019 E-mail
Christopher Shearer	Osteopathic Association; Opioid	02/14/2019 E-mail
	Overdose Fatality Review Board	
Claire Nguyen	State Department of Health	01/21/2019 Letter
		02/15/2019 E-mail
Darrell Weaver	Bureau of Narcotics & Dangerous Drugs Control	01/14/2018 E-mail
Deborah Bruce	Board of Osteopathic Examiners	10/30/2018 Letter

Page 3

<u>Custodian</u>	State Agency	Dates Purdue Requested Files
	·	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
		02/14/2019 E-mail
Diana O'Neal	Office of Management & Enterprise	10/30/2018 Letter
	Services	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
		02/14/2019 E-mail
Don Vogt	Bureau of Narcotics & Dangerous	10/30/2018 Letter
	Drugs Control	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
Drew Edmondson	Former Attorney General	12/10/2018 Letter
		02/01/2019 Letter
		02/14/2019 E-mail
Durand Crosby	Department of Mental Health &	10/30/2018 Letter
	Substance Abuse Services	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
		02/14/2019 E-mail
Ed Lake	Department of Human Services;	02/14/2019 E-mail
	Opioid Overdose Fatality Review	
	Board	
Ed Long	Health Care Authority	12/18/2018 Letter
		02/01/2019 Letter
		02/14/2019 E-mail
Ellen Buettner	Department of Mental Health &	10/30/2018 Letter
	Substance Abuse Services	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
	•	01/24/2019 Conference Call
		02/01/2019 Letter

Mr. Drew Pate Nix Patterson, LLP February 22, 2019

Page 4

<u>Custodian</u>	State Agency	Dates Purdue Requested Files
		02/14/2019 E-mail
Ferris Barger	Office of Management & Enterprise	10/30/2018 Letter
	Services	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
		02/14/2019 E-mail
Frank Lawler	Office of Management & Enterprise	10/30/2018 Letter
	Services	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
		02/14/2019 E-mail
Frank Wilson	Office of Management & Enterprise	10/30/2018 Letter
	Services	12/06/2018 Motion to Compel
		01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
		02/14/2019 E-mail
Jason Beaman	Oklahoma State University Center for	10/30/2018 Letter
	Health Services	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
Jean Hausheer	State Medical Association; Opioid	02/14/2019 E-mail
	Overdose Fatality Review Board	
Jessica Hawkins	Department of Mental Health &	10/30/2018 Letter
	Substance Abuse Services	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
		02/14/2019 E-mail
Jill Geiger	Office of State Finance	02/01/2019
		02/14/2019
John Scully	Bureau of Narcotics & Dangerous	02/01/2019 Letter
	Drugs Control	02/14/2019 E-mail

Page 5

<u>Custodian</u>	State Agency	Dates Purdue Requested Files
Kevin Taubman	Opioid Overdose Fatality Review	02/14/2019 E-mail
	Board	
Liz Massey	Board of Nursing	10/30/2018 Letter
-	_	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
		02/14/2019 E-mail
Lyle Kesley	Medical Board	02/01/2019 Letter
-		02/14/2019 E-mail
Lynn Mitchell	State Department of Health;	10/30/2018 Letter
•	Employees Group Insurance Division	11/26/2018 Letter
	Board; Health Care Authority	12/06/2018 Motion to Compel
		01/23/2019 E-mail
Lynne Bajema	Office of Management & Enterprise	02/01/2019 Letter
	Services	02/14/2019 E-mail
Mark Liotta	Workers' Compensation Commission	10/30/2018 Letter
		11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
Mark Reynolds	Department of Mental Health &	10/30/2018 Letter
	Substance Abuse Services	12/06/2018 Motion to Compel
		01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
		02/14/2019 E-mail
Mark St. Cyr	State Board of Pharmacy	10/30/2018 Letter
		11/26/2018 Letter
		12/06/2018 Motion to Compel
	·	01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
		02/14/2019 E-mail
Mark Stewart	Bureau of Narcotics and Dangerous	10/30/2018 Letter
	Drugs Control	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail

Page 6

<u>Custodian</u>	State Agency	Dates Purdue Requested Files
Mark Woodward	Bureau of Narcotics & Dangerous	10/30/2018 Letter
	Drugs Control	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
Mary Fallin	Former Governor	12/10/2018 Letter
		02/01/2019 Letter
		02/14/2019 E-mail
Mike Fogarty	Health Care Authority	02/14/2019 E-mail
Mike Hunter	Attorney General	12/10/2018 Letter
		02/01/2019 Letter
		02/14/2019 E-mail
Nichole King	Office of Management & Enterprise	10/30/2018 Letter
_	Services	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
	}	02/14/2019 E-mail
Patricia Sommer	Workers' Compensation Commission	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
Paul King	Office of Management & Enterprise	10/30/2018 Letter
	Services	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
		02/14/2019 E-mail
Reji Varghese	Board of Medical Licensure &	10/30/2018 Letter
	Supervision	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
		02/14/2019 E-mail
Rick Adams	State Bureau of Investigation	02/01/2019 Letter
		02/14/2019 E-mail
Scott Pruitt .	Former Attorney General	12/10/2018 Letter
		02/01/2019 Letter

Page 7

<u>Custodian</u>	State Agency	Dates Purdue Requested Files
		02/14/2019 E-mail
Stephanie U'ren	State Department of Health	10/30/2018 Letter
-		11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
		02/01/2019 Letter
		02/14/2019 E-mail
Steven Buck	Office of Juvenile Affairs	10/30/2018 Letter
		11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
		02/14/2019 E-mail
Steven Crawford	Oklahoma Health Care Authority	10/30/2018 Letter
		11/26/2018 Letter
		12/06/2018 Motion to Compel
	·	01/23/2019 E-mail
		01/24/2019 Conference Call
Steven Montgomery	Employees Group Insurance Division	10/30/2018 Letter
	Board	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
		02/14/2019 E-mail
Susan Rogers	State Dental Board; Bureau of	10/30/2018 Letter
	Narcotics and Dangerous Drugs	12/06/2018 Motion to Compel
•	Control	01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
		02/14/2019 E-mail
Sylvia Lopez	Health Care Authority	12/18/2018 Letter
		02/01/2019 Letter
		02/14/2019 E-mail
Terri White	Department of Mental Health &	10/30/2018 Letter
	Substance Abuse Services	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail

Mr. Drew Pate Nix Patterson, LLP February 22, 2019

Page 8

Custodian	State Agency	Dates Purdue Requested Files
Theresa South	Office of Management & Enterprise	10/30/2018 Letter
	Services	11/26/2018 Letter
		12/06/2018 Motion to Compel
:		01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
		02/14/2019 E-mail
Tom Bates	Former Assistant State Attorney	02/14/2019 E-mail
	General	
Travis Tate	Office of Management & Enterprise	10/30/2018 Letter
	Services	11/26/2018 Letter
		12/06/2018 Motion to Compel
		01/23/2019 E-mail
		01/24/2019 Conference Call
		02/01/2019 Letter
		02/14/2019 E-mail
Vickie Kersey	Oklahoma Health Care Authority	12/18/2018 Letter
		02/01/2019 Letter
	<u> </u>	02/14/2019 E-mail

B. Responsive Documents that the State Has Not Produced

In addition to files from the relevant custodians identified above, the State has not produced the following documents or categories of documents, which are responsive to Purdue's document requests, including document requests that were the subject of (1) the Court's order from April 25, 2018 compelling production; and (2) the Court's order from the January 17, 2019 hearing, which required the State to produce responsive documents by February 5, 2019. The State has not fully complied with those orders. Accordingly, please produce these documents by 5:00 p.m. Central Time on March 1, 2019.

Document or Category of Documents	Notes
Oklahoma Department of Public Safety documents	The Court ordered production on October 4, 2018. The State has not produced these documents.
Oklahoma Drug Threat Assessments	The State has produced only the 2017 report. Purdue reminded the State to produce these

Page 9

Document or Category of Documents	<u>Notes</u>
	responsive documents on January 7, 2019. At a minimum, these documents are responsive to Purdue Pharma LP's First Requests for Production Nos. 3, 6, and 8.
Medical examiner summaries relied upon in compiling statistics related to overdose deaths in Oklahoma.	Purdue reminded the State to produce these responsive documents on January 21, 2019. At a minimum, these documents are responsive to Purdue Pharma LP's First Requests for Production Nos. 3 and 6.
Dr. Burl Beasley's February 5, 2019 presentation at the Medicaid Innovations Forum in Orlando, Florida, as well as any drafts or related documents.	Purdue reminded the State to produce these responsive documents on February 15, 2019. At a minimum, these documents are responsive to Purdue Pharma LP's First Requests for Production Nos. 6 and 8.
Dr. Burl Beasley's Spring 2018 presentations to the Board of Pharmacy in Oklahoma City and Tulsa, as well as any drafts or related documents.	Purdue reminded the State to produce these responsive documents on February 15, 2019. At a minimum, these documents are responsive to Purdue Pharma LP's First Requests for Production Nos. 6 and 8.
Dr. Burl Beasley's presentation to the Oklahoma Health Care Authority related to the estimated cost of implementing an electronic records system, as well as any drafts or related documents.	Purdue reminded the State to produce these responsive documents on February 15, 2019. At a minimum, these documents are responsive to Purdue Pharma LP's First Requests for Production No. 5.
All contracts between the Oklahoma Health Care Authority and Pharmacy Management Consultants, including all proposals and RFIs from Pharmacy Management Consultants and other interested vendors that were received in connection with those contracts.	Purdue reminded the State to produce these responsive documents on February 15, 2019. At a minimum, these documents are responsive to Purdue Pharma LP's First Requests for Production No. 3 and Purdue Frederick's First Requests for Production No. 3.
All documents related to the Oklahoma Health Care Authority's audit of compounded topical medications and subsequent determination to	Purdue reminded the State to produce these responsive documents on February 15, 2019. At a minimum, these documents are

Mr. Drew Pate Nix Patterson, LLP February 22, 2019

Page 10

Document or Category of Documents	Notes
cease coverage and reimbursement for those medications.	responsive to Purdue Pharma LP's First Requests for Production No. 6 and Purdue Pharma Inc.'s First Requests for Production No. 4.
All documents related to the Oklahoma Health Care Authority's ongoing initiative to review Pharmacy Management Consultants' processing of prior authorizations.	Purdue reminded the State to produce these responsive documents on February 15, 2019. At a minimum, these documents are responsive to Purdue Frederick's First Requests for Production Nos. 5, 6, and 7, and Purdue Pharma Inc.'s First Requests for Production Nos. 2 and 3.
Mandatory quarterly reports for the Centers for Disease Control on opioid prescribing statistics, including statistics on high prescribers, doctor shoppers, PDMP alters on conflicting and dangerous prescriptions, none of which contain individualized patient data.	The State has not produced these documents. At a minimum, these documents are responsive to Purdue Pharma LP's First Requests for Production Nos. 3, 6, and 8.
Oklahoma Bureau of Narcotics & Dangerous Drugs Control's diversion reports.	The State has only produced the 2006-2007 report. At a minimum, these documents are responsive to Purdue Pharma LP's First Requests for Production Nos. 3, 6, and 8.
All minutes of meetings of the Oklahoma Board of Dentistry during which opioid medications or diversion of prescription drugs were discussed.	The State has not produced these documents. At a minimum, these documents are responsive to Purdue Pharma LP's First Requests for Production Nos. 6 and 8.
All communications from the Oklahoma Board of Dentistry or its officers addressing draft or proposed legislation related to opioids.	The State has not produced these documents. At a minimum, these documents are responsive to Purdue Pharma LP's First Requests for Production No. 6.
All meetings of minutes for the Drug Utilization Review Board during which opioid medications, diversion of prescription drugs, addiction to prescription drugs, or Medicaid fraud were discussed.	The State has not produced these documents. At a minimum, these documents are responsive to Purdue Pharma LP's First Requests for Production Nos. 2, 6, and 8.

Page 11

Document or Category of Documents	<u>Notes</u>
All Drug Utilization Review Board Reports.	The State has produced very few of the existing reports. At a minimum, these documents are responsive to Purdue Pharma LP's First Requests for Production Nos. 2, 6, and 8.
Documents within the possession, custody, or control of Employee's Group Insurance Department and the Office of Management and Enterprise Services.	The State has produced only 68 documents from Employee's Group Insurance Department. At a minimum, these documents are responsive to Purdue Pharma LP's First Requests for Production Nos. 6 and 8 and Purdue Frederick's First Requests for Production Nos. 5, 6, and 7.
Oklahoma Bureau of Narcotics and Dangerous Drugs' PowerPoints and public education presentations, including drafts, regarding prescription drugs or opioids.	Mark Woodward testified that he has approximately 24 years of presentations in his possession, which the State has not produced. At a minimum, these documents are responsive to Purdue Pharma LP's First Requests for Production Nos. 6 and 8.
The meeting minutes from any State-sponsored or State-formed group or commission related to opioids, including but not limited to the minutes from the meetings of the groups that met to discuss the opioid prescribing guidelines.	The State has not produced these documents. At a minimum, these documents are responsive to Purdue Pharma LP's First Requests for Production Nos. 6 and 8.

C. The State's February 21, 2019 Productions

Finally, I note that yesterday, the State produced documents through approximately sixty-three separate production e-mails and links. Purdue is beginning its review of that production. If you contend the State's most recent production satisfied the State's production obligations that I have addressed here, then please provide me the Bates label ranges for the responsive custodial files, documents, or categories of documents.

Mr. Drew Pate Nix Patterson, LLP February 22, 2019

Page 12

Please contact me if you have any questions.

Thank you,

Elizabeth Yvonne Ryan

EYR:as

EXHIBIT B

HealthChoice Standard Medication List

The HealthChoice Standard Medication List is a guide within select therapeutic categories for clients, plan members and health care providers. Generics should be considered the first line of prescribing. If there is no generic available, there may be more than one brand-name medicine to treat a condition. These preferred brand-name medicines are listed to help identify products that are clinically appropriate and cost-effective. Generics listed in therapeutic categories are for representational purposes only. This is not an all-inclusive list. This list represents brand products in CAPS, branded generics in upper- and lowercase Italics, and generic products in lowercase

PLAN MEMBER

HealthChoice provides you with prescription benefits administered by CVS Caremark®. Ask your doctor to consider prescribing, when medically appropriate, a preferred medicine from this list. Take this list along when you or a covered family member sees a doctor.

Please note:

- Your specific prescription benefit plan design may not cover certain products or categories, regardless of their appearance in this document. Products recently approved by the U.S. Food and Drug Administration (FDA) may not be covered upon release to the market.
- You may be responsible for the full cost of non-formulary products that are removed from coverage.
- For specific information regarding your prescription benefit coverage and copay1 information, please visit www.caremark.com or contact a CVS Caremark Customer Care representative at 1-877-720-9375. If you have a hearing impairment and need telecommunications device (TDD) assistance, please dial 1-800-863-5488.
- CVS Caremark may contact your doctor after receiving your prescription to request consideration of a drug list product or generic equivalent. This may result in your doctor prescribing. when medically appropriate, a different brand-name product or generic equivalent in place of your original prescription.
- In most instances, a brand-name drug for which a generic product becomes available will be designated as a nonpreferred option upon release of the generic product to the market.

HEALTH CARE PROVIDER

Your patient is covered under HealthChoice prescription benefits administered by CVS Caremark. As a way to help manage health care costs, we encourage you to authorize generic substitutions whenever possible. If you believe a brand-name product is necessary, consider prescribing a brand-name product on this list.

Please note:

- Generics should be considered the first line of prescribing.
- This drug list represents a summary of prescription coverage. It is not all-inclusive and does not guarantee coverage. HealthChoice prescription benefits may not cover certain products or categories, regardless of their appearance in this document. Products recently approved by the FDA may not be covered upon release to the market.
- HealthChoice may have a different copay1 for specific products on the list.
- Unless specifically indicated, drug list products will include all dosage forms.
- Log on to www.caremark.com to check coverage and copay1 information for a specific medicine.

ANALGESICS

§ NSAIDs

diclofenac sodium meloxicam naproxen

§ NSAIDs, COMBINATIONS

diclofenac sodiummisoprostol

§ NSAIDs, TOPICAL

diclofenac sodium gel 1% diclofenac sodium solution

§ COX-2 INHIBITORS

celecoxib

§ GOUT allopurinol

colchicine tablet probenecid COLCRYS

ULORIC

§ OPIOID ANALGESICS

codeine-acetaminophen fentanyl transdermal fentanyl transmucosal lozenae

hydrocodone-acetaminophen hydromorphone

hydromorphone ext-rel methadone morphine

morphine ext-rel morphine suppository oxycodone

oxycodone-acetaminophen tramadol tramadol ext-rel

ABSTRAL **BELBUCA BUTRANS EMBEDA**

HYSINGLA ER NUCYNTA **NUCYNTA ER** OXYCONTIN SUBSYS

ANTI-INFECTIVES

ANTIBACTERIALS § CEPHALOSPORINS

cefdinir cefprozil cefuroxime axetil cephalexin SUPRAX

§ ERYTHROMYCINS / **MACROLIDES**

azithromycin clarithromycin clarithromycin ext-rel erythromycins

DIFICID

§ FLUOROQUINOLONES

ciprofloxacin ciprofloxacin ext-rel levofloxacin moxifloxacin

§ PENICILLINS

amoxicillin amoxicillin-clavulanate dicloxacillin penicillin VK

§ TETRACYCLINES

doxycycline hyclate minocycline tetracycline

§ ANTIFUNGALS

fluconazole itraconazole terbinafine tablet

ANTIVIRALS

§ CYTOMEGALOVIRUS **AGENTS**

valganciclovir

§ HERPES AGENTS

acvclovir valacyclovir

§ INFLUENZA AGENTS

oseltamivir RELENZA

§ MISCELLANEOUS

clindamycin ivermectin linezolid metronidazole nitrofurantoin sulfamethoxazole-

Your specific prescription benefit plan design may not cover certain products or categories, regardless of their appearance in this document. For specific information, visit www.caremark.com or contact a CVS Caremark Customer Care representative.



trimethoprim EMVERM XIFAXAN 550 MG

ANTINEOPLASTIC AGENTS

HORMONAL ANTINEOPLASTIC AGENTS § ANTIANDROGENS bicalutamide

§ MISCELLANEOUS VISTOGARD

CARDIOVASCULAR

§ ACE INHIBITORS

fosinopril lisinopril quinapril ramipril

§ ACE INHIBITOR / DIURETIC COMBINATIONS

fosinopril-hydrochlorothiazide lisinopril-hydrochlorothiazide quinapril-hydrochlorothiazide

§ ANGIOTENSIN II RECEPTOR ANTAGONISTS / DIURETIC COMBINATIONS

candesartan / candesartanhydrochlorothiazide eprosartan irbesartan / irbesartanhydrochlorothiazide losartan / losartanhydrochlorothiazide olmesartan / olmesartanhydrochlorothiazide telmisartan / telmisartanhydrochlorothiazide valsartan / valsartanhydrochlorothiazide

§ ANGIOTENSIN II RECEPTOR ANTAGONIST / CALCIUM CHANNEL BLOCKER COMBINATIONS

amlodipine-olmesartan amlodipine-telmisartan amlodipine-valsartan

§ ANGIOTENSIN II RECEPTOR ANTAGONIST / CALCIUM CHANNEL BLOCKER / DIURETIC COMBINATIONS

amlodipine-valsartanhydrochlorothiazide olmesartan-amlodipinehydrochlorothiazide

§ ANTIARRHYTHMICS

sotalol MULTAQ

ANTILIPEMICS
§ BILE ACID RESINS

cholestyramine

colesevelam

§ CHOLESTEROL ABSORPTION INHIBITORS ezetimibe

§ FIBRATES

fenofibrate fenofibric acid

§ HMG-CoA REDUCTASE INHIBITORS / COMBINATIONS

atorvastatin ezetimibe-simvastatin fluvastatin lovastatin pravastatin rosuvastatin simvastatin

§ NIACINS

VASCEPA

niacin ext-rel

§ OMEGA-3 FATTY ACIDS omega-3 acid ethyl esters

§ BETA-BLOCKERS

atenolol
carvedilol
metoprolol succinate ext-rel
metoprolol tartrate
nadolol
pindolol
propranolol
propranolol ext-rel
BYSTOLIC
COREG CR

§ CALCIUM CHANNEL BLOCKERS

amlodipine diltiazem ext-rel² nifedipine ext-rel verapamil ext-rel

§ CALCIUM CHANNEL BLOCKER / ANTILIPEMIC COMBINATIONS

amlodipine-atorvastatin

§ DIGITALIS GLYCOSIDES digoxin

DIRECT RENIN INHIBITORS / DIURETIC COMBINATIONS

TEKTURNA /
TEKTURNA HCT

§ DIURETICS

amiloride furosemide hydrochlorothiazide metolazone spironolactonehydrochlorothiazide torsemide triamterenehydrochlorothiazide

HEART FAILURE

BIDIL CORLANOR ENTRESTO

§ NITRATES

nitroglycerin lingual spray nitroglycerin sublingual

§ MISCELLANEOUS RANEXA

CENTRAL NERVOUS SYSTEM

§ ANTICONVULSANTS

carbamazepine carbamazepine ext-rel diazepam rectal gel divalproex sodium divalproex sodium ext-rel ethosuximide gabapentin lamotrigine lamotrigine ext-rel **levetiracetam** levetiracetam ext-rel oxcarbazepine phenobarbital phenytoin phenytoin sodium extended primidone tiagabine topiramate valproic acid zonisamide **FYCOMPA** OXTELLAR XR TROKENDI XR VIMPAT

§ ANTIDEMENTIA

donepezil
galantamine
galantamine ext-rel
memantine
rivastigmine
rivastigmine transdermal
NAMZARIC

ANTIDEPRESSANTS

§ SELECTIVE SEROTONIN REUPTAKE INHIBITORS (SSRIs)

citalopram
escitalopram
fluoxetine
paroxetine HCI
paroxetine HCI ext-rel
sertraline
TRINTELLIX
VIIBRYD

§ SEROTONIN NOREPINEPHRINE REUPTAKE INHIBITORS (SNRIS)

desvenlafaxine ext-rel duloxetine venlafaxine venlafaxine ext-rel capsule

§ MISCELLANEOUS AGENTS

bupropion bupropion ext-rel mirtazapine trazodone

§ ANTIPARKINSONIAN AGENTS

amantadine
carbidopa-levodopa
carbidopa-levodopa ext-rel
carbidopa-levodopaentacapone
entacapone
pramipexole
pramipexole ext-rel
rasagiline
ropinirole
ropinirole ext-rel
selegiline
NEUPRO

ANTIPSYCHOTICS § ATYPICALS

aripiprazole
clozapine
olanzapine
quetiapine
quetiapine ext-rel
risperidone
ziprasidone
ABILIFY MAINTENA
ARISTADA
LATUDA
VRAYLAR

§ ATTENTION DEFICIT HYPERACTIVITY DISORDER

amphetaminedextroamphetamine
mixed salts
amphetaminedextroamphetamine
mixed salts ext-rel
atomoxetine
guanfacine ext-rel
methylphenidate
methylphenidate ext-rel
MYDAYIS
VYVANSE

FIBROMYALGIA

LYRICA SAVELLA

HYPNOTICS

§ NONBENZODIAZEPINES eszopiclone zolpidem

zolpidem ext-rel zolpidem sublingual BELSOMRA

TRICYCLICS
SILENOR

MIGRAINE § ERGOTAMINE DERIVATIVES

ergotamine-caffeine

§ SELECTIVE SEROTONIN AGONISTS

eletriptan naratriptan rizatriptan sumatriptan zolmitriptan ONZETRA XSAIL ZEMBRACE SYMTOUCH ZOMIG NASAL SPRAY

SELECTIVE SEROTONIN
AGONIST / NONSTEROIDAL
ANTI-INFLAMMATORY
DRUG (NSAID)
COMBINATIONS
TREXIMET

§ MUSCULOSKELETAL THERAPY AGENTS

cyclobenzaprine

§ NARCOLEPSY armodafinil

POSTHERPETIC NEURALGIA (PHN)

GRALISE

PSYCHOTHERAPEUTIC - MISCELLANEOUS § OPIOID ANTAGONISTS naloxone injection

NARCAN NASAL SPRAY

§ PARTIAL OPIOID AGONIST / OPIOID ANTAGONIST COMBINATIONS

buprenorphine-naloxone sublingual tablet SUBOXONE FILM ZUBSOLV

PSEUDOBULBAR AFFECT AGENTS

NUEDEXTA

§ VASOMOTOR SYMPTOM AGENTS

paroxetine mesylate

ENDOCRINE AND METABOLIC

§ ANDROGENS

testosterone gel testosterone solution ANDRODERM ANDROGEL 1.62%

∴ He lthChoice

ANTIDIABETICS
AMYLIN ANALOGS
SYMLINPEN

§ BIGUANIDES

metformin

metformin ext-rel

§ BIGUANIDE / SULFONYLUREA COMBINATIONS alipizide-metformin

DIPEPTIDYL PEPTIDASE-4 (DPP-4) INHIBITORS JANUVIA

DIPEPTIDYL PEPTIDASE-4 (DPP-4) INHIBITOR / BIGUANIDE COMBINATIONS

JANUMET XR

INCRETIN MIMETIC AGENTS

OZEMPIC TRULICITY VICTOZA

INCRETIN MIMETIC AGENT / INSULIN COMBINATIONS

SOLIQUA

INSULINS
BASAGLAR
FIASP
HUMULIN R U-500
LEVEMIR
NOVOLIN 70/30
NOVOLIN N
NOVOLIN R
NOVOLOG
NOVOLOG MIX 70/30
TRESIBA

§ INSULIN SENSITIZERS pioglitazone

§ INSULIN SENSITIZER / BIGUANIDE COMBINATIONS

pioglitazone-metformin

§ INSULIN SENSITIZER / SULFONYLUREA COMBINATIONS

pioglitazone-glimepiride

§ MEGLITINIDES

nateglinide repaglinide

SODIUM-GLUCOSE CO-TRANSPORTER 2 (SGLT2) INHIBITORS

FARXIGA JARDIANCE

SODIUM-GLUCOSE CO-TRANSPORTER 2 (SGLT2) INHIBITOR / BIGUANIDE COMBINATIONS SYNJARDY SYNJARDY XR XIGDUO XR

SODIUM-GLUCOSE
CO-TRANSPORTER 2
(SGLT2) INHIBITOR /
DIPEPTIDYL PEPTIDASE-4
(DPP-4) INHIBITOR
COMBINATIONS
GLYXAMBI

§ SULFONYLUREAS glimepiride glipizide

glipizide ext-rel SUPPLIES

OTERN

ACCU-CHEK AVIVA PLUS STRIPS AND KITS ³ ACCU-CHEK COMPACT PLUS STRIPS AND KITS ³ ACCU-CHEK GUIDE STRIPS AND KITS ³ ACCU-CHEK SMARTVIEW STRIPS AND KITS ³ BD ULTRAFINE INSULIN SYRINGES AND NEEDLES

CALCIUM REGULATORS § BISPHOSPHONATES

alendronate ibandronate risedronate

§ CALCITONINS calcitonin-salmon

§ CARNITINE DEFICIENCY AGENTS

levocamitine

CONTRACEPTIVES § MONOPHASIC

ethinyl estradioldrospirenone ethinyl estradioldrospirenone-levomefolate

ethinyl estradiolnorethindrone acetate

norethindrone acet ethinyl estradiol-

norethindrone acetate-iron SAFYRAL

§ BIPHASIC LO LOESTRIN FE

§ TRIPHASIC

ethinyl estradiol-norgestimate
FOUR PHASE

§ EXTENDED CYCLE ethinyl estradiol-

levonorgestrel

NATAZIA

§ TRANSDERMAL ethinyl estradiolnorelgestromin

VAGINAL NUVARING

ESTROGENS § ORAL estradiol estropipate

PREMARIN

§ TRANSDERMAL

estradiol DIVIGEL EVAMIST MINIVELLE

§ VAGINAL estradiol ESTRACE CREAM ESTRING

§ ORAL

PREMARIN CREAM
ESTROGEN / PROGESTINS

estradiol-norethindrone PREMPHASE PREMPRO

TRANSDERMAL CLIMARA PRO COMBIPATCH

ESTROGEN / SELECTIVE ESTROGEN RECEPTOR MODULATOR COMBINATIONS

DUAVEE

§ GLUCOCORTICOIDS

dexamethasone methylprednisolone prednisolone solution prednisone

GLUCOSE ELEVATING AGENTS

GLUCAGEN HYPOKIT GLUCAGON EMERGENCY

§ PHOSPHATE BINDER AGENTS

calcium acetate
lanthanum carbonate
sevelamer carbonate
PHOSLYRA
VELPHORO

POTASSIUM-REMOVING AGENTS

VELTASSA
PROGESTINS

§ ORAL

medroxyprogesterone megestrol acetate progesterone, micronized VAGINAL CRINONE ENDOMETRIN

§ SELECTIVE ESTROGEN RECEPTOR MODULATORS

raloxifene OSPHENA

§ THYROID SUPPLEMENTS levothyroxine

GASTROINTESTINAL

§ ANTIEMETICS

SYNTHROID

dronabinol
granisetron
meclizine
metoclopramide
ondansetron
prochlorperazine
promethazine
trimethobenzamide
DICLEGIS
SANCUSO
VARUBI

§ H2 RECEPTOR ANTAGONISTS

ranitidine

INFLAMMATORY BOWEL DISEASE

§ ORAL AGENTS

balsalazide
budesonide capsule
sulfasalazine
sulfasalazine delayed-rel
APRISO
LIALDA
PENTASA
UCERIS

§ RECTAL AGENTS

hydrocortisone enema mesalamine rectal suspension CANASA CORTIFOAM

§ IRRITABLE BOWEL SYNDROME

alosetron AMITIZA LINZESS VIBERZI

§ LAXATIVES

lactulose peg 3350-electrolytes SUPREP

OPIOID-INDUCED CONSTIPATION MOVANTIK

PANCREATIC ENZYMES

CREON VIOKACE ZENPEP

§ PROTON PUMP INHIBITORS

esomeprazole lansoprazole omeprazole pantoprazole DEXILANT

§ STEROIDS, RECTAL PROCTOFOAM-HC

§ ULCER THERAPY COMBINATIONS PYLERA

GENITOURINARY

§ BENIGN PROSTATIC HYPERPLASIA

alfuzosin ext-rel doxazosin dutasteride dutasteride-tamsulosin finasteride tamsulosin terazosin RAPAFLO

§ URINARY ANTISPASMODICS

darifenacin ext-rel oxybutynin oxybutynin ext-rel totterodine totterodine ext-rel trospium trospium ext-rel MYRBETRIQ TOVIAZ VESICARE

HEMATOLOGIC

§ ANTICOAGULANTS

warfarin ELIQUIS XARELTO

§ PLATELET AGGREGATION INHIBITORS

clopidogrel dipyridamole ext-rel-aspirin prasugrel BRILINTA

> IMMUNOLOGIC AGENTS

ALLERGENIC EXTRACTS

GRASTEK RAGWITEK

> NUTRITIONAL / SUPPLEMENTS

§ ELECTROLYTES potassium chloride liquid

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VITAMINS AND MINERALS § PRENATAL VITAMINS

prenatal vitamins CITRANATAL

RESPIRATORY

§ ANAPHYLAXIS TREATMENT AGENTS

epinephrine auto-injector **EPIPEN** EPIPEN JR

§ ANTICHOLINERGICS

ipratropium inhalation solution **INCRUSE ELLIPTA SPIRIVA**

ANTICHOLINERGIC / BETA **AGONIST COMBINATIONS**

§ SHORT ACTING

ipratropium-albuterol inhalation solution COMBIVENT RESPIMAT

LONG ACTING

ANORO ELLIPTA **BEVESPI AEROSPHERE** STIOLTO RESPIMAT

ANTICHOLINERGIC / BETA AGONIST / STEROID INHALANT COMBINATIONS

TRELEGY ELLIPTA

BETA AGONISTS. **INHALANTS**

§ SHORT ACTING

albuterol inhalation solution levalbuterol tartrate CFC-free aerosol PROAIR HFA PROAIR RESPICLICK

LONG ACTING

Hand-held Active Inhalation

SEREVENT STRIVERDI RESPIMAT

Nebulized Passive Inhalation

PERFOROMIST

§ LEUKOTRIENE MODULATORS

montelukast zafirlukast zileuton ext-rel

§ NASAL ANTIHISTAMINES

azelastine olopatadine

§ NASAL STEROIDS / COMBINATIONS

flunisolide fluticasone mometasone triamcinolone **DYMISTA**

PHOSPHODIESTERASE-4

INHIBITORS DALIRESP

STEROID / BETA AGONIST COMBINATIONS

ADVAIR BREO ELLIPTA SYMBICORT

§ STEROID INHALANTS

budesonide inhalation suspension ARNUITY ELLIPTA ASMANEX FLOVENT DISKUS FLOVENT HFA PULMICORT FLEXHALER OVAR **QVAR REDIHALER**

TOPICAL

DERMATOLOGY ACNE

§ Topical

adapalene benzovl peroxide clindamycin solution clindamycin-benzoyl peroxide erythromycin solution erythromycin-benzoyl peroxide

tretinoin **ATRALIN** DIFFERIN **EPIDUO RETIN-A MICRO TAZORAC**

§ ACTINIC KERATOSIS

fluorouracil cream 5% fluorouracil solution imiquimod **PICATO** TOLAK **ZYCLARA**

§ ANTIFUNGALS

ciclopirox clotrimazole econazole ketoconazole nystatin JUBLIA LUZU NAFTIN

§ ANTIPSORIATICS

acitretin calcipotriene methoxsalen

§ ATOPIC DERMATITIS

tacrolimus ELIDEL **EUCRISA**

CORTICOSTEROIDS

§ Low Potency desonide hydrocortisone

§ Medium Potency

clocortolone hydrocortisone butyrate mometasone triamcinolone

§ High Potency

desoximetasone fluocinonide

§ Very High Potency

clobetasol cream, foam, gel, lotion, ointment, shampoo

§ ROSACEA metronidazole **FINACEA**

ORACEA

SOOLANTRA

MOUTH / THROAT / **DENTAL AGENTS PROTECTANTS**

EPISIL

OPHTHALMIC § ANTIALLERGICS

azelastine cromolyn sodium olopatadine LASTACAFT **PAZEO**

§ ANTI-INFECTIVES

ciprofloxacin erythromycin gentamicin levofloxacin moxifloxacin ofloxacin sulfacetamide tobramycin **BESIVANCE** CILOXAN OINTMENT MOXEZA

§ ANTI-INFECTIVE / **ANTI-INFLAMMATORY COMBINATIONS**

neomycin-polymyxin Bbacitracin-hydrocortisone neomycin-polymyxin Bdexamethasone tobramycin-dexamethasone TOBRADEX OINTMENT TOBRADEX ST **ZYLET**

ANTI-INFLAMMATORIES

§ Nonsteroidal

bromfenac diclofenac ketorolac **ACUVAIL ILEVRO NEVANAC**

§ Steroidal

dexamethasone prednisolone acetate 1% DUREZOL **FLAREX**

FML FORTE FML S.O.P. MAXIDEX PRED MILD

BETA-BLOCKERS

§ Nonselective

timolol maleate solution **BETIMOL**

Selective BETOPTIC S

§ CARBONIC ANHYDRASE **INHIBITORS**

dorzolamide AZOPT

§ CARBONIC ANHYDRASE INHIBITOR / BETA-**BLOCKER COMBINATIONS**

dorzolamide-timolol

CARBONIC ANHYDRASE INHIBITOR I SYMPATHOMIMETIC **COMBINATIONS**

DRY EYE DISEASE

RESTASIS XIIDRA

SIMBRINZA

§ PROSTAGLANDINS

latanoprost LUMIGAN TRAVATAN Z

RHO KINASE INHIBITORS RHOPRESSA

§ SYMPATHOMIMETICS brimonidine ALPHAGAN P

SYMPATHOMIMETIC / BETA-**BLOCKER COMBINATIONS** COMBIGAN

OTIC

§ ANTI-INFECTIVE / ANTI-INFLAMMATORY COMBINATIONS CIPRODEX

QUICK REFERENCE DRUG LIST

ABILIFY MAINTENA

A

ABSTRAL ACCU-CHEK AVIVA PLUS STRIPS AND KITS 3 ACCU-CHEK COMPACT PLUS STRIPS AND KITS³ ACCU-CHEK GUIDE STRIPS AND KITS³ ACCU-CHEK SMARTVIEW STRIPS AND KITS 3

acitretin **ACUVAIL** acyclovin adapalene **ADVAIR**

albuterol inhalation solution alendronate alfuzosin ext-rel allopurinol alosetron ALPHAGAN P

amantadine amiloride **AMITIZA** amlodipine

amlodipine-atorvastatin amlodipine-olmesartan amlodipine-telmisartan amlodipine-valsartan amlodipine-valsartanhydrochlorothiazide amoxicillin

amoxicillin-clavulanate amphetaminedextroamphetamine mixed salts amphetaminedextroamphetamine mixed salts ext-rel **ANDRODERM** ANDROGEL 1.62% ANORO ELLIPTA

APRISO

aripiprazole **ARISTADA** armodafinil ARNUITY ELLIPTA **ASMANEX** atenolol atomoxetine atorvastatin **ATRALIN** azelastine azithromvcin

AZOPT

В

balsalazide
BASAGLAR
BD ULTRAFINE INSULIN
SYRINGES AND
NEEDLES
BELBUCA
BELSOMRA
benzoyl peroxide
BESIVANCE
BETIMOL
BETOPTIC S

BEVESPI AEROSPHERE bicalutamide

BIDIL BREO ELLIPTA BRILINTA

brimonidine bromfenac budesonide capsule

budesonide inhalation suspension buprenorphine-naloxone sublingual tablet

bupropion bupropion ext-rel BUTRANS BYSTOLIC

c

calcipotriene
calcitonin-salmon
calcium acetate
CANASA
candesartan
candesartanhydrochlorothiazide
carbamazepine
carbamazepine ext-rel
carbidopa-levodopa
carbidopa-levodopa
entacapone
carvedilol
cefainir

cerainir
cefprozil
cefuroxime axetil
celecoxib
cephalexin
cholestyramine
ciclopirox

CILOXAN OINTMENT

CIPRODEX
ciprofloxacin ext-rel
citalopram
CITRANATAL
clarithromycin
clarithromycin ext-rel
CLIMARA PRO
clindamycin

clindamycin solution clindamycin-benzoyl peroxide

clobetasol cream, foam, gel, lotion, ointment, shampoo clocortolone clopidogrel clotrimazole clozapine codeine acet

codeine-acetaminophen colchicine tablet COLCRYS colesevelam COMBIGAN COMBIPATCH

COMBIVENT RESPIMAT COREG CR CORLANOR

CREON CRINONE cromolyn sodium cyclobenzaprine

CORTIFOAM

D

DALIRESP darifenacin ext-rel desonide desoximetasone desvenlafaxine ext-rel dexamethasone **DEXILANT** diazepam rectal gel **DICLEGIS** diclofenac diclofenac sodium diclofenac sodium gel 1% diclofenac sodium solution diclofenac sodiummisoprostol dicloxacillin DIFFERIN DIFICID digoxin diltiazem ext-rel² dipyridamole ext-rel-aspirin divalproex sodium

divalproex sodium ext-rel

DIVIGEL

donepezil

doxazosin

dronabinol

DUAVEE

duloxetine

dorzolamide

dorzolamide-timolol

doxycycline hyclate

DUREZOL
dutasteride
dutasteride-tamsulosin
DYMISTA

E
econazole

econazole
eletriptan
ELIDEL
ELIQUIS
EMBEDA
EMVERM
ENDOMETRIN
entacapone
ENTRESTO
EPIDUO
epinephrine auto-injector

EPIPEN

EPIPEN JR EPISIL eprosartan ergotamine-caffeine erythromycin erythromycin solution erythromycin-benzoyl

peroxide erythromycins escitalopram esomeprazole ESTRACE CREAM estradiol

estradiol-norethindrone ESTRING estropipate

eszopiclone ethinyl estradioldrospirenone ethinyl estradiol-

drospirenone-levomefolate ethinyl estradiol-

levonorgestrel ethinyl estradiolnorelgestromin ethinyl estradiolnorethindrone acetate

ethinyl estradiolnorethindrone acetate-iron ethinyl estradiol-norgestimate

ethosuximide EUCRISA EVAMIST ezetimibe

ezetimibe-simvastatin

F

FARXIGA fenofibrate fenofibric acid fentanyl transdermal fentanyl transmucosal

lozenge FIASP FINACEA finasteride FLAREX FLOVENT

FLOVENT DISKUS FLOVENT HFA fluconazole flunisolide fluocinonide

fluorouracil cream 5% fluorouracil solution fluoxetine fluticasone

fluvastatin FML FORTE FML S.O.P. fosinopril

fosinopril-hydrochlorothiazide furosemide FYCOMPA

G

gabapentin galantamine galantamine ext-rel gentamicin glimepiride glipizide glipizide ext-rel glipizide-metformin GLUCAGEN HYPOKIT GLUCAGON EMERGENCY KIT GLYXAMBI GRALISE granisetron

н

GRASTEK

quanfacine ext-rel

HUMULIN R U-500 hydrochlorothiazide hydrocodone-acetaminophen hydrocortisone hydrocortisone butyrate hydrocortisone enema hydromorphone hydromorphone ext-rel HYSINGLA ER

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ibandronate
ILEVRO
imiquimod
INCRUSE ELLIPTA
ipratropium inhalation
solution
ipratropium-albuterol
inhalation solution
irbesartan
irbesartanhydrochlorothiazide
itraconazole
ivermectin

J JAN

JANUMET JANUMET XR JANUVIA JARDIANCE JUBLIA

K

ketoconazole ketorolac

L

lactulose lamotrigine lamotrigine ext-rel iansoprazole lanthanum carbonate LASTACAFT latanoprost LATUDA levalbuterol tartrate CFC-free aemsol **LEVEMIR** levetiracetam levetiracetam ext-rel levocamitine levofloxacin levothyroxine LIALDA linezolid

LINZESS
lisinopril
lisinopril-hydrochlorothiazide
LO LOESTRIN FE
losartan
losartan-hydrochlorothiazide
lovastatin
LUMIGAN
LUZU
LYRICA

M

MAXIDEX meclizine medroxyprogesterone megestrol acetate meloxicam memantine mesalamine rectal suspension metformin metformin ext-rel methadone methoxsalen methylphenidate methylphenidate ext-rel methylprednisolone metoclopramide metolazone metoprolol succinate ext-rel metoprolol tartrate metronidazole MINIVELLE minocycline mirtazapine mometasone montelukast morphine morphine ext-rel morphine suppository MOVANTIK MOXEZA moxifloxacin MULTAQ **MYDAYIS MYRBETRIQ**

N

nadolol NAFTIN naloxone injection NAMZARIC naproxen naratriptan NARCAN NASAL SPRAY NATAZIA natealinide neomycin-polymyxin Bbacitracin-hydrocortisone neomycin-polymyxin Bdexamethasone **NEUPRO NEVANAC** niacin ext-rel nifedipine ext-rel nitrofurantoin nitroglycerin lingual spray nitroglycerin sublingual NOVOLIN 70/30



NOVOLIN N NOVOLIN R NOVOLOG NOVOLOG MIX 70/30 NUCYNTA **NUCYNTA ER** NUEDEXTA **NUVARING** nystatin

ō

ofloxacin olanzapine olmesartan

olmesartan-amlodipinehydrochlorothiazide olmesartan-

hydrochlorothiazide olopatadine

omega-3 acid ethyl esters omeprazole

ondansetron **ONZETRA XSAIL ORACEA** oseltamivir **OSPHENA** oxcarbazepine OXTELLAR XR oxybutynin

oxycodone oxycodone-acetaminophen **OXYCONTIN**

OZEMPIC

oxybutynin ext-rel

P

pantoprazole paroxetine HCI paroxetine HCl ext-rel paroxetine mesylate **PAZEO**

peg 3350-electrolytes penicillin VK **PENTASA PERFOROMIST** phenobarbital

phenytoin phenytoin sodium extended **PHOSLYRA**

ALCORTIN A

PICATO pindolol pioalitazone

pioglitazone-glimepiride pioglitazone-metformin potassium chloride liquid

pramipexole pramipexole ext-rel prasugrel pravastatin PRED MILD

prednisolone acetate 1% prednisolone solution prednisone

PREMARIN PREMARIN CREAM **PREMPHASE PREMPRO** prenatal vitamins primidone

PROAIR HEA PROAIR RESPICLICK probenecid

prochlorperazine PROCTOFOAM-HC progesterone, micronized promethazine propranolol propranolol ext-rel

PULMICORT FLEXHALER **PYLERA**

Q

QTERN quetiapine quetiapine ext-rel

quinapril quinapril-hydrochlorothiazide

QVAR

QVAR REDIHALER

R

RAGWITEK raloxifene ramipril **RANEXA** ranitidine **RAPAFLO** rasagiline

RELENZA repaglinide

RESTASIS RETIN-A MICRO RHOPRESSA risedronate risperidone

rivastiamine rivastigmine transdermal

rizatriptan ropinirole ropinirole ext-rel rosuvastatin

s

SAFYRAL SANCUSO SAVELLA seleailine SEREVENT sertraline

sevelamer carbonate SILENOR SIMBRINZA simvastatin SOLIQUA SOOLANTRA sotalol **SPIRIVA**

spironolactonehydrochlorothiazide STIOLTO RESPIMAT STRIVERDI RESPIMAT SUBOXONE FILM

SUBSYS sulfacetamide sulfamethoxazoletrimethoprim

sulfasalazine sulfasalazine delayed-rel

sumatriptan SUPRAX SUPREP SYMBICORT **SYMLINPEN** SYNJARDY SYNJARDY XR

SYNTHROID

T

tacrolimus tamsulosin TAZORAC TEKTURNA TEKTURNA HCT telmisartan telmisartanhydrochlorothiazide terazosin terbinafine tablet

testosterone solution tetracycline tiagabine

testosterone gel

timolol maleate solution TOBRADEX OINTMENT TOBRADEX ST

tobramycin tobramycin-dexamethasone

TOLAK tolterodine tolterodine ext-rel topiramate torsemide **TOVIAZ** tramadol tramadol ext-rel TRAVATAN Z trazodone

TRELEGY ELLIPTA **TRESIBA** tretinoin TREXIMET triamcinolone triamterene-

hydrochlorothiazide trimethobenzamide TRINTELLIX TROKENDI XR trospium trospium ext-rel

u **UCERIS** ULORIC

TRULICITY

v

valacyclovir valganciclovir valproic acid valsartan

valsartan-hydrochlorothiazide

VARUBI VASCEPA VELPHORO **VELTASSA** venlafaxine

venlafaxine ext-rel capsule verapamil ext-rel

VESICARE VIBERZI VICTOZA VIIBRYD VIMPAT VIOKACE VISTOGARD **VRAYLAR** VYVANSE

w

warfarin

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XARELTO XIFAXAN 550 MG XIGDUO XR **XIIDRA**

Z

zafirlukast ZEMBRACE SYMTOUCH

ZENPEP zileuton ext-rel ziprasidone zolmitriptan zolpidem zolpidem ext-rel zolpidem sublingual ZOMIG NASAL SPRAY

zonisamide ZUBSOLV **ZYCLARA** ZYLET

PREFERRED OPTIONS LIST

DRUG NAME(S)	PREFERRED OPTION(S)*
ABILIFY	aripiprazole, clozapine, olanzapine, quetiapine, quetiapine ext-rel, risperidone, ziprasidone, LATUDA, VRAYLAR
ACANYA	adapalene, benzoyl peroxide, clindamycin solution, clindamycin-benzoyl peroxide, erythromycin solution, erythromycin-benzoyl peroxide, tretinoin, ATRALIN, DIFFERIN, EPIDUO, RETIN-A MICRO, TAZORAC
ACTICLATE	doxycycline hyclate
ACTOS	pioglitazone
ADDERALL XR	amphetamine-dextroamphetamine mixed salts ext-rel, methylphenidate ext-rel, MYDAYIS, VYVANSE

desonide, hydrocortisone

PREFERRED OPTION(S)*

ALEVICYN GEL, ALEVICYN KIT. desonide, hydrocortisone ALEVICYN SG, Alevicyn solution

ALLISON MEDICAL INSULIN SYRINGES 5

ALORA

DRUG NAME(S)

ALTOPREV

ALVESCO

AMRIX ANDROGEL 1%

BD ULTRAFINE INSULIN SYRINGES

estradiol, DIVIGEL, EVAMIST, MINIVELLE

atorvastatin, ezetimibe-simvastatin, fluvastatin, lovastatin, pravastatin, rosuvastatin, simvastatin

ARNUITY ELLIPTA, ASMANEX, FLOVENT DISKUS.

FLOVENT HFA, PULMICORT FLEXHALER, QVAR,

QVAR REDIHALER

cyclobenzaprine

testosterone gel, testosterone solution, ANDRODERM, ANDROGEL 1.62%



DRUG NAME(S)	PREFERRED OPTION(S)*	DRUG NAME(S)	PREFERRED OPTION(S)*	
ANGELIQ	estradiol-norethindrone, PREMPHASE, PREMPRO	CAFERGOT	eletriptan, ergotamine-caffeine, naratriptan, rizatriptan, sumatriptan, zolmitriptan, ONZETRA XSAIL, ZEMBRACE SYMTOUCH, ZOMIG NASAL SPRAY	
ANTARA	fenofibrate, fenofibric acid			
APEXICON E	desoximetasone, fluocinonide	CAMBIA	diclofenac sodium, meloxicam, naproxen	
APIDRA	FIASP, NOVOLOG	CARAC	fluorouracil cream 5%, fluorouracil solution, imiquimod,	
ARMOUR THYROID	levothyroxine, SYNTHROID		PICATO, TOLAK, ZYCLARA	
ARTHROTEC	celecoxib; diclofenac sodium, meloxicam or	CARDIZEM	diltiazem ext-rel (except generic CARDIZEM LA)	
	naproxen WITH esomeprazole, lansoprazole, omeprazole, pantoprazole or DEXILANT	CARDIZEM CD	diltiazem ext-rel (except generic CARDIZEM LA)	
ASACOL HD	balsalazide, sulfasalazine, sulfasalazine delayed-rel,	CARDIZEM LA (and its generics)	dittiazem ext-rel (except generic CARDIZEM LA)	
	APRISO, LIALDA, PENTASA	CARNITOR	levocamitine	
ASCENSIA STRIPS AND KITS 4	ACCU-CHEK AVIVA PLUS STRIPS AND KITS 3, ACCU-CHEK COMPACT PLUS STRIPS AND KITS 3,	CARNITOR SF	levocamitine	
	ACCU-CHEK GUIDE STRIPS AND KITS 3,	CLINDAGEL	erythromycin solution	
	ACCU-CHEK SMARTVIEW STRIPS AND KITS 3	clobetasol spray	clobetasol foam	
ATACAND, ATACAND HCT	candesartan, candesartan-hydrochlorothiazide, eprosartan, irbesartan, irbesartan-hydrochlorothiazide,	CLOBEX SPRAY	clobetasol foam	
	losartan, losartan-hydrochlorothiazide, olmesartan, olmesartan-hydrochlorothiazide, telmisartan,	COLAZAL	balsalazide	
ATROVENT HFA	telmisartan-hydrochlorothiazide, valsartan, valsartan-hydrochlorothiazide ipratropium inhalation solution, INCRUSE ELLIPTA,	CONTOUR NEXT STRIPS AND KITS 4	ACCU-CHEK AVIVA PLUS STRIPS AND KITS 3, ACCU-CHEK COMPACT PLUS STRIPS AND KITS 3, ACCU-CHEK GUIDE STRIPS AND KITS 3, ACCU-CHEK SMARTVIEW STRIPS AND KITS 3	
71110721771177	SPIRIVA	CONTOUR STRIPS AND KITS 4	ACCU-CHEK AVIVA PLUS STRIPS AND KITS 3,	
AVENOVA	Consult doctor	CONTOUR STRIPS AND RITS	ACCU-CHEK COMPACT PLUS STRIPS AND KITS 3, ACCU-CHEK GUIDE STRIPS AND KITS 3,	
AXERT	eletriptan, naratriptan, rizatriptan, sumatriptan, zolmitriptan, ONZETRA XSAIL, ZEMBRACE SYMTOUCH, ZOMIG NASAL SPRAY	CRESTOR	ACCU-CHEK SMARTVIEW STRIPS AND KITS 3 atorvastatin, ezetimibe-simvastatin, fluvastatin,	
AZELEX adapalene, benzoyl peroxide, clindamycin solu clindamycin-benzoyl peroxide, erythromycin so erythromycin-benzoyl peroxide, tretinoin, ATRA	,		lovastatin, pravastatin, rosuvastatin, simvastatin	
	clindamycin-benzoyl peroxide, erythromycin solution, erythromycin-benzoyl peroxide, tretinoin, ATRALIN,	CYMBALTA	desvenlafaxine ext-rel, duloxetine, venlafaxine, venlafaxine ext-rel capsule	
BECONASE AQ	DIFFERIN, EPIDUO, RETIN-A MICRO, TAZORAC flunisolide, fluticasone, mometasone, triamcinolone,	DELZICOL	balsalazide, sulfasalazine, sulfasalazine delayed-rel, APRISO, LIALDA, PENTASA	
	DYMISTA	DETROL LA	darifenacin ext-rel, oxybutynin ext-rel, tolterodine,	
BENICAR, BENICAR HCT	candesartan, candesartan-hydrochlorothiazide, eprosartan, irbesartan, irbesartan-hydrochlorothiazide,	le.	totterodine ext-rel, trospium, trospium ext-rel, MYRBETRIQ, TOVIAZ, VESICARE	
losartan, losartan-hydrochlorothiazide, olmesa olmesartan-hydrochlorothiazide, telmisartan,	losartan, losartan-hydrochlorothiazide, olmesartan,	DEXPAK	dexamethasone, methylprednisolone, prednisolone solution, prednisone	
	valsartan-hydrochlorothiazide	DIOVAN, DIOVAN HCT	candesartan, candesartan-hydrochlorothiazide,	
BENSAL HP	desonide, hydrocortisone		eprosartan, irbesartan, irbesartan-hydrochlorothiazide, losartan, losartan-hydrochlorothiazide, olmesartan,	
BENZAC AC	adapalene, benzoyl peroxide, clindamycin solution, clindamycin-benzoyl peroxide, erythromycin solution, erythromycin-benzoyl peroxide, tretinoin, ATRALIN,		olmesartan-hydrochlorothiazide, telmisartan, telmisartan-hydrochlorothiazide, valsartan, valsartan-hydrochlorothiazide	
BENZACLIN adapalene, benzo	DIFFERIN, EPIDUO, RETIN-A MICRO, TAZORAC adapatene, benzoyl peroxide, clindamycin solution,	DORAL	eszopiclone, zolpidem, zolpidem ext-ret, zolpidem sublingual, BELSOMRA, SILENOR	
	clindamycin-benzoyl peroxide, erythromycin solution, erythromycin-benzoyl peroxide, tretinoin, ATRALIN, DIFFERIN, EPIDUO, RETIN-A MICRO, TAZORAC	DORYX	doxycycline hyclate	
		DORYX MPC	doxycycline hyclate	
BENZIQ	adapalene, benzoyl peroxide, clindamycin solution, clindamycin-benzoyl peroxide, erythromycin solution,	DULERA	ADVAIR, BREO ELLIPTA, SYMBICORT	
erythromyd	erythromycin-benzoyl peroxide, tretinoin, ATRALIN,	DUTOPROL	metoprolol succinate ext-rel WITH hydrochlorothiazide	
DIFFERIN, EPIDUO, RETIN-A MICRO, TAZORAC	DYRENIUM	amiloride		
BETAPACE, BETAPACE AF BREEZE 2 STRIPS AND KITS 4	sotalol ACCU-CHEK AVIVA PLUS STRIPS AND KITS 3, ACCU-CHEK COMPACT PLUS STRIPS AND KITS 3, ACCU-CHEK GUIDE STRIPS AND KITS 3, ACCU-CHEK SMARTVIEW STRIPS AND KITS 3	EDARBI, EDARBYCLOR	candesartan, candesartan-hydrochlorothiazide, eprosartan, irbesartan, irbesartan-hydrochlorothiazide, losartan, losartan-hydrochlorothiazide, olmesartan, olmesartan-hydrochlorothiazide, telmisartan, telmisartan-hydrochlorothiazide, valsartan,	
butalbital-acetaminophen- caffeine capsule	diclofenac sodium, naproxen	EDLUAR	valsartan-hydrochlorothiazide eszopiclone, zolpidem, zolpidem ext-rel,	
BYDUREON	OZEMPIC, TRULICITY, VICTOZA	E D 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	zolpidem sublingual, BELSOMRA, SILENOR	
BYETTA	OZEMPIC, TRULICITY, VICTOZA	E.E.S. GRANULES	erythromycins	



DRUG NAME(S)	PREFERRED OPTION(S)*	DRUG NAME(S)	PREFERRED OPTION(S)*
EFFEXOR XR	desvenlafaxine ext-rel, duloxetine, venlafaxine,	ISTALOL	timolol maleate solution, BETIMOL
ENABLEX	venlafaxine ext-rel capsule darifenacin ext-rel, oxybutynin ext-rel, tolterodine, tolterodine ext-rel, trospium, trospium ext-rel,	JALYN	dutasteride-tamsulosin; dutasteride or finasteride WITH alfuzosin ext-rel, doxazosin, tamsulosin, terazosin, RAPAFLO
	MYRBETRIQ, TOVIAZ, VESICARE	JENTADUETO	JANUMET, JANUMET XR
ERYPED	erythromycins	JENTADUETO XR	JANUMET, JANUMET XR
EVZIO	naloxone injection, NARCAN NASAL SPRAY	KAZANO	JANUMET, JANUMET XR
EXFORGE	amlodipine-olmesartan, amlodipine-telmisartan,	KOMBIGLYZE XR	JANUMET, JANUMET XR
EXFORGE HCT	amlodipine-valsartan amlodipine-valsartan-hydrochlorothiazide,	LANOXIN TABLET (125 MCG and 250 MCG only)	digoxin
CANADT	lmesartan-amlodipine-hydrochlorothiazide	LANTUS	BASAGLAR, LEVEMIR, TRESIBA
FANAPT	aripiprazole, clozapine, olanzapine, quetiapine, quetiapine ext-rel, risperidone, ziprasidone, LATUDA, VRAYLAR	LAZANDA	fentanyl transmucosal lozenge, ABSTRAL, SUBSYS
FEMRING	estradiol, ESTRACE CREAM, ESTRING, PREMARIN CREAM	LESCOL XL	atorvastatin, ezetimibe-simvastatin, fluvastatin, lovastatin, pravastatin, rosuvastatin, simvastatin
FETZIMA	desvenlafaxine ext-rel, duloxetine, venlafaxine, venlafaxine ext-rel capsule	levorphanol	fentanyl transdermal, hydromorphone ext-rel, methadone, morphine ext-rel, EMBEDA, HYSINGLA ER, NUCYNTA ER, OXYCONTIN
FIORICET CAPSULE	diclofenac sodium, naproxen	LIPITOR	atorvastatin, ezetimibe-simvastatin, fluvastatin,
fluorouracil cream 0.5%	fluorouracil cream 5%, fluorouracil solution, imiquimod, PICATO, TOLAK, ZYCLARA	LIVALO	lovastatin, pravastatin, rosuvastatin, simvastatin atorvastatin, ezetimibe-simvastatin, fluvastatin,
FORTAMET	metformin, metformin ext-rel		lovastatin, pravastatin, rosuvastatin, simvastatin
FORTESTA	testosterone gel, testosterone solution, ANDRODERM, ANDROGEL 1.62%	LUNESTA	eszopiclone, zolpidem, zolpidem ext-rel, zolpidem sublingual, BELSOMRA, SILENOR
FOSAMAX PLUS D	alendronate, ibandronate, risedronate	MACRODANTIN	nitrofurantoin
FOSRENOL		Matzim LA	diltiazem ext-rel (except generic CARDIZEM LA)
	sevelamer carbonate, PHOSLYRA, VELPHORO	MENEST	estradiol, estropipate, PREMARIN
FREESTYLE STRIPS AND KITS 4	ACCU-CHEK AVIVA PLUS STRIPS AND KITS 3, ACCU-CHEK COMPACT PLUS STRIPS AND KITS 3,	MENOSTAR	estradiol
	ACCU-CHEK GUIDE STRIPS AND KITS 3, ACCU-CHEK SMARTVIEW STRIPS AND KITS 3	MIACALCIN INJECTION	alendronate, calcitonin-salmon, ibandronate, risedronate, FORTEO, PROLIA, TYMLOS
FROVA		MIACALCIN NASAL SPRAY	calcitonin-salmon
0	zolmitriptan, ONZETRA XSAIL, ZEMBRACE SYMTOUCH, ZOMIG NASAL SPRAY	MICARDIS, MICARDIS HCT	candesartan, candesartan-hydrochlorothiazide, eprosartan, irbesartan, irbesartan-hydrochlorothiazide, losartan, losartan-hydrochlorothiazide, olmesartan, olmesartan-hydrochlorothiazide, telmisartan, telmisartan-hydrochlorothiazide, valsartan,
GLUMETZA	metformin, metformin ext-rel		
HORIZANT	gabapentin, GRALISE		
HUMALOG	FIASP, NOVOLOG	MULIDDED	valsartan-hydrochlorothiazide
HUMALOG MIX 50/50	NOVOLOG MIX 70/30	MILLIPRED	dexamethasone, methylprednisolone, prednisolone solution, prednisone
HUMALOG MIX 75/25	NOVOLOG MIX 70/30	MINOCIN	minocycline
HUMULIN 70/30	NOVOLIN 70/30	NAPRELAN	diclofenac sodium, meloxicam, naproxen
HUMULIN N	NOVOLIN N	NATESTO	testosterone gel, testosterone solution, ANDRODERM,
HUMULIN R	NOVOLIN R		ANDROGEL 1.62%
INDOCIN	diclofenac sodium, meloxicam, naproxen	NESINA	JANUVIA
INNOPRAN XL	atenolol, carvedilol, metoprolol succinate ext-rel, metoprolol tartrate, nadolol, pindolol, propranolol, propranolol ext-rel, BY.STOLIC, COREG CR	NEXIUM	esomeprazole, lansoprazole, omeprazole, pantoprazole, DEXILANT
INTERMEZZO eszopiclone, zolpidem, zolpidem ext-rel, zolpidem sublingual, BELSOMRA, SILENOR		NILANDRON	bicalutamide, XTANDI, ZYTIGA
		NITROMIST	nitroglycerin lingual spray, nitroglycerin sublingual
	amphetamine-dextroamphetamine mixed salts ext-rel, atomoxetine, guanfacine ext-rel, methylphenidate ext-rel, MYDAYIS, VYVANSE	NORITATE	metronidazole, FINACEA, SOOLANTRA
		NORVASC	amlodipine
INVOKAMET	SYNJARDY, SYNJARDY XR, XIGDUO XR	NOVACORT	desonide, hydrocortisone
INVOKAMET XR	SYNJARDY, SYNJARDY XR, XIGDUO XR	NOVO NORDISK NEEDLES 5	BD ULTRAFINE NEEDLES
INVOKANA	FARXIGA, JARDIANCE	NUVIGIL	armodafinil
		OLEPTRO	trazodone



DRUG NAME(S)	PREFERRED OPTION(S)*	DRUG NAME(S)	PREFERRED OPTION(S)*
OLUX-E	clobetasol foam	RIOMET	metformin, metformin ext-rel
OMNARIS	flunisolide, fluticasone, mometasone, triamcinolone, DYMISTA	ROZEREM	eszopiclone, zolpidem, zolpidem ext-rel, zolpidem sublingual, BELSOMRA, SILENOR
ONETOUCH ULTRA STRIPS AND KITS 4	ACCU-CHEK AVIVA PLUS STRIPS AND KITS 3, ACCU-CHEK COMPACT PLUS STRIPS AND KITS 3, ACCU-CHEK GUIDE STRIPS AND KITS 3, ACCU-CHEK SWADT/IEM STRIPS AND KITS 3	SEROQUEL XR	aripiprazole, ckozapine, olanzapine, quetiapine, quetiapine ext-rel, risperidone, ziprasidone, LATUDA, VRAYLAR
ONETOUCH VERIO STRIPS	ACCU-CHEK SMARTVIEW STRIPS AND KITS 3 ONETOUCH VERIO STRIPS ACCU-CHEK AVIVA PLUS STRIPS AND KITS 3.		calcipotriene
AND KITS 4 A	ACCU-CHEK COMPACT PLUS STRIPS AND KITS 3,	SPRIX	diclofenac sodium, meloxicam, naproxen
	ACCU-CHEK GUIDE STRIPS AND KITS 3, ACCU-CHEK SMARTVIEW STRIPS AND KITS 3	STRIANT	testosterone gel, testosterone solution, ANDRODERM, ANDROGEL 1.62%
ONEXTON	adapalene, benzoyl peroxide, clindamycin solution, clindamycin-benzoyl peroxide, erythromycin solution, erythromycin-benzoyl peroxide, tretinoin, ATRALIN, DIFFERIN, EPIDUO, RETIN-A MICRO, TAZORAC	SURE-TEST STRIPS AND KITS 4	ACCU-CHEK AVIVA PLUS STRIPS AND KITS 3, ACCU-CHEK COMPACT PLUS STRIPS AND KITS 3, ACCU-CHEK GUIDE STRIPS AND KITS 3, ACCU-CHEK SMARTVIEW STRIPS AND KITS 3
ONGLYZA	JANUVIA	SYNERDERM	desonide, hydrocortisone
OSENI	JANUMET, JANUMET XR	TANZEUM	OZEMPIC, TRULICITY, VICTOZA
OWEN MUMFORD NEEDLES 5	BD ULTRAFINE NEEDLES	TARGADOX	doxycycline hyclate
OXYTROL	darifenacin ext-rel, oxybutynin ext-rel, tolterodine, tolterodine ext-rel, trospium, trospium ext-rel, MYRBETRIQ, TOVIAZ, VESICARE	TESTIM	testosterone gel, testosterone solution, ANDRODERM, ANDROGEL 1.62%
PANCREAZE	CREON, VIOKACE, ZENPEP	testosterone gel 1% 6	testosterone gel, testosterone solution, ANDRODERM, ANDROGEL 1.62%
PENNSAID	diclofenac sodium, diclofenac sodium gel 1%, diclofenac sodium solution, meloxicam, naproxen	TIROSINT	levothyroxine, SYNTHROID
PERRIGO NEEDLES 5	BD ULTRAFINE NEEDLES	TOUJEO	BASAGLAR, LEVEMIR, TRESIBA
PERTZYE	CREON, VIOKACE, ZENPEP	TRADJENTA	JANUVIA
PEXEVA	citalopram, escitalopram, fluoxetine, paroxetine HCI,	TRICOR	fenofibrate, fenofibric acid
	paroxetine HCl ext-rel, sertraline, TRINTELLIX, VIIBRYD	TRIGLIDE	fenofibrate, fenofibric acid
PLAVIX	clopidogrel, prasugrel, BRILINTA	TRILIPIX	fenofibrate, fenofibric acid
PRADAXA	warfarin, ELIQUIS, XARELTO	TRIVIDIA INSULIN SYRINGES 5	BD ULTRAFINE INSULIN SYRINGES
PRECISION XTRA STRIPS AND KITS 4	ACCU-CHEK AVIVA PLUS STRIPS AND KITS 3, ACCU-CHEK COMPACT PLUS STRIPS AND KITS 3, ACCU-CHEK GUIDE STRIPS AND KITS 3, ACCU-CHEK SMARTVIEW STRIPS AND KITS 3	TRUETEST STRIPS AND KITS 4	ACCU-CHEK AVIVA PLUS STRIPS AND KITS 3, ACCU-CHEK COMPACT PLUS STRIPS AND KITS 3, ACCU-CHEK GUIDE STRIPS AND KITS 3, ACCU-CHEK SMARTVIEW STRIPS AND KITS 3
PRED FORTE	dexamethasone, prednisolone acetate 1%, DUREZOL, FLAREX, FML FORTE, FML S.O.P., MAXIDEX, PRED MILD	TRUETRACK STRIPS AND KITS 4	ACCU-CHEK AVIVA PLUS STRIPS AND KITS 3, ACCU-CHEK COMPACT PLUS STRIPS AND KITS 3, ACCU-CHEK GUIDE STRIPS AND KITS 3, ACCU-CHEK SMARTVIEW STRIPS AND KITS 3
PREFERAOB	generic prenatal vitamins, CITRANATAL	TUDORZA	INCRUSE ELLIPTA, SPIRIVA
PREFEST	estradiol-norethindrone, PREMPHASE, PREMPRO	ULTIMED INSULIN SYRINGES 5	BD ULTRAFINE INSULIN SYRINGES
PRENATAL PLUS	generic prenatal vitamins, CITRANATAL	ULTIMED NEEDLES 5	BD ULTRAFINE NEEDLES
PREVACID	esomeprazole, lansoprazole, omeprazole, pantoprazole, DEXILANT	UROXATRAL	affuzosin ext-rel, doxazosin, tamsulosin, terazosin, RAPAFLO
PRIMLEV	hydrocodone-acetaminophen, hydromorphone, morphine, oxycodone-acetaminophen, NUCYNTA	VALCYTE	valganciclovir
PROTONIX	esomeprazole, lansoprazole, omeprazole, pantoprazole,	VALTREX	acyclovir, valacyclovir
PROTOPIC	DEXILANT	VANATOL LQ	diclofenac sodium, naproxen
PROVENTIL HFA	tacrolimus, ELIDEL, EUCRISA levalbuterol tartrate CFC-free aerosol, PROAIR HFA,	VANATOL S	diclofenac sodium, naproxen
QNASL	PROAIR RESPICLICK flunisolide, fluticasone, mometasone, triamcinolone,	Vanoxide-HC	adapalene, benzoyl peroxide, clindamycin solution, clindamycin-benzoyl peroxide, erythromycin solution, erythromycin-benzoyl peroxide, tretinoin, ATRALIN,
RAYOS	DYMISTA dexamethasone, methylprednisolone,	VELTIN	DIFFERIN, EPIDUO, RETIN-A MICRO, TAZORAC adapalene, benzoyl peroxide, clindamycin solution, clindamycin-benzoyl peroxide, erythromycin solution, erythromycin-benzoyl peroxide, tretinoin, ATRALIN, DIFFERIN, EPIDUO, RETIN-A MICRO, TAZORAC
	prednisolone solution, prednisone		
RELION INSULIN	NOVOLIN INSULIN		
RELISTOR	MOVANTIK	venlafaxine ext-rel tablet (except 225 mg)	desvenlafaxine ext-rel, duloxetine, venlafaxine, venlafaxine ext-rel capsule
RIMSO-50	Consult doctor		



DRUG NAME(S)	PREFERRED OPTION(S)*	DRUG NAME(S)	PREFERRED OPTION(S)*	
VENLAFAXINE EXT-REL TABLET (except 225 MG)	desvenlafaxine ext-rel, duloxetine, venlafaxine, venlafaxine ext-rel capsule	ZIANA	adapalene, benzoyl peroxide, clindamycin solution, clindamycin-benzoyl peroxide, erythromycin solution, erythromycin-benzoyl peroxide, tretinoin, ATRALIN, DIFFERIN, EPIDUO, RETIN-A MICRO, TAZORAC	
VENTOLIN HFA	levalbuterol tartrate CFC-free aerosol, PROAIR HFA, PROAIR RESPICLICK			
VITAFOL-ONE	generic prenatal vitamins, CITRANATAL	ZOLPIMIST	eszopiclone, zolpidem, zolpidem ext-rel, zolpidem sublingual, BELSOMRA, SILENOR	
VOGELXO	testosterone gel, testosterone solution, ANDRODERM, ANDROGEL 1.62%	ZONEGRAN	carbamazepine, carbamazepine ext-rel, divalproex sodium, divalproex sodium ext-rel, gabapentin, lamotrigine, lamotrigine ext-rel, levetiracetam, levetiracetam ext-rel, oxcarbazepine, phenobarbital, phenytoin, phenytoin sodium extended,	
XOPENEX HFA	levalbuterol tartrate CFC-free aerosol, PROAIR HFA, PROAIR RESPICLICK			
ZEGERID	esomeprazole, lansoprazole, omeprazole, pantoprazole, DEXILANT		tiagabine, topiramate, valproic acid, zonisamide, FYCOMPA, OXTELLAR XR, TROKENDI XR, VIMPAT	
ZETIA	ezetimibe	ZUPLENZ	granisetron, ondansetron, SANCUSO	
ZETONNA	flunisolide, fluticasone, mometasone, triamcinolone, DYMISTA	ZYFLO, ZYFLO CR	montelukast, zafirlukast, zileuton ext-rel	

You may be responsible for the full cost of certain non-formulary products that are removed from coverage. Please check with your plan sponsor for more information.

FOR YOUR INFORMATION: Generics should be considered the first line of prescribing. This drug list represents a summary of prescription coverage. It is not all-inclusive and does not guarantee coverage. New-to-market products and new variations of products already in the marketplace will not be added to the formulary immediately. Each product will be evaluated for clinical appropriateness and cost-effectiveness. Recommended additions to the formulary will be presented to the CVS Caremark National Pharmacy and Therapeutics Committee (or other appropriate reviewing body) for review and approval. In most instances, a brand-name drug for which a generic product becomes available will be designated as a non-preferred option upon release of the generic product to the market. Specific prescription benefit plan design may not cover certain products or categories, regardless of their appearance in this document. The member's prescription benefit plan may have a different copay' for specific products on the list. Unless specifically indicated, drug list products will include all dosage forms. This list represents brand products in CAPS, branded generics in upper- and lowercase *ltalics*, and generic products in lowercase *italics*. Generics fisted in therapeutic categories are for representational purposes only. Listed products may be available generically in certain strengths or dosage forms. Dosage forms on this list will be consistent with the category and use where listed. Log in to www.caremark.com to check coverage and copay' information for a specific medicine.

An exception process may exist for specific clinical or regulatory circumstances that may require coverage of an excluded medication.

- * The preferred options in this list are a broad representation within therapeutic categories of available treatment options and do not necessarily represent clinical equivalency.
- § Generics are available in this class and should be considered the first line of prescribing.
- 1 Copayment, copay or coinsurance means the amount a member is required to pay for a prescription in accordance with a Plan, which may be a deductible, a percentage of the prescription price, a fixed amount or other charge, with the balance, if any, paid by a Plan.
- ² Listing does not include generic CARDIZEM LA.
- 3 An ACCU-CHEK blood glucose meter may be provided at no charge by the manufacturer to those individuals currently using a meter other than ACCU-CHEK. For more information on how to obtain a blood glucose meter, call: 1-877-418-4746.
- 4 ACCU-CHEK brand test strips are the only preferred options.
- 5 BD ULTRAFINE syringes and needles are the only preferred options.
- ⁶ Listing reflects the authorized generics for TESTIM and VOGELXO.

Plan member privacy is important to us. Our employees are trained regarding the appropriate way to handle members' private health information.

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