

IN THE DIS	TRICT COURT OF CLEVELAND COUNTY
ST	ATESTATEOFORICALECEMA
STATE OF OKLAHOMA, C	ATESOATE OF OKLAND COUNTY EVELAND COUNTY FXELAND COUNTY ALLAND COUNTY AL
ATTORNEY GENERAL OF (JKLAHOWA, j
	$\mathbf{MAP} () 4 \mathbf{Z} \mathbf{U} 5 \mathbf{J}$
v.	In the office of the Case No. CJ-2017-816 Court Clerk MARILYN WILLIAMS
PURDUE PHARMA L.P., et a	
)
Defendants.)

Defendants.

MOTION TO ASSOCIATE DAVID STEVEN COALE AS COUNSEL

Defendants Purdue Pharma, L.P., Purdue Pharma, Inc. and The Purdue Frederick Company, Inc. hereby move the Court for an Order permitting out-of-state counsel David Steven Coale to practice in the above-styled and numbered cause pursuant to the Rules Creating and Controlling the Oklahoma Bar Association, 5 O.S. Ch. 1, App. 1, Art. II. This motion is supported by the attached "Signed Application" (Exhibit A), "Certificate of Good Standing" (Exhibit B), and the "Certificate of Compliance" from the Oklahoma Bar Association (Exhibit C).

DATED: <u>March 4</u>, 2019.

Respectfully submitted,

SANFORD C. COATS, OBA #18268 JOSHUA D. BURNS, OBA #32967 **CROWE & DUNLEVY** A Professional Corporation **Braniff Building** 324 N. Robinson Ave., Suite 100 Oklahoma City, Oklahoma 73102 (405) 235-7700; (405) 239-6651 (Facsimile) sandy.coats@crowedunlevy.com joshua.burns@crowedunlevy.com

ATTORNEYS FOR DEFENDANTS PURDUE PHARMA, L.P., PURDUE PHARMA, INC. AND THE PURDUE FREDERICK **COMPANY, INC.**

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing was e-mailed, this <u>4</u> day of <u>March</u>, 2019 to:

WHITTEN BURRAGE Michael Burrage Reggie Whitten 512 N. Broadway Avenue, Suite 300 Oklahoma City, OK 73102 mburrage@whittenburragelaw.com rwhitten@whittenburragelaw.com *Counsel for Plaintiff the State of Oklahoma*

NIX, PATTERSON & ROACH, LLP Bradley E. Beckworth Jeffrey J. Angelovich Lloyd "Trey" Nolan Duck, III Andrew Pate Lisa Baldwin Nathan B. Hall 512 N. Broadway Ave., Suite 200 Oklahoma City, OK 73102 bbeckworth@nixlaw.com jangelovich@npraustin.com tduck@nixlaw.com dpate@nixlaw.com lbaldwin@nixlaw.com nhall@nixlaw.com Counsel for Plaintiff the State of Oklahoma

ODOM, SPARKS & JONES PLLC Benjamin H. Odom John H. Sparks Michael W. Ridgeway David L. Kinney HiPoint Office Building 2500 McGee Drive Ste. 140 Oklahoma City, OK 73072 odomb@odomsparks.com sparksj@odomsparks.com ridgewaym@odomsparks.com kinneyd@odomsparks.com Counsel for Defendants Janssen Pharmaceuticals, Inc., Johnson & Johnson, Janssen Pharmaceutica, Inc. n/k/a/ Janssen Pharmaceuticals, Inc., and Ortho-McNeil-Janssen Pharmaceuticals. Inc. n/k/a/

OKLAHOMA OFFICE OF THE ATTORNEY GENERAL Mike Hunter Abby Dillsaver Ethan A. Shaner 313 NE 21st St Oklahoma City, OK 73105 abby.dillsaver@oag.ok.gov ethan.shaner@oag.ok.gov *Counsel for Plaintiff the State of Oklahoma*

GLENN COFFEE & ASSOCIATES, PLLC Glenn Coffee 915 N. Robinson Ave. Oklahoma City, OK 73102 gcoffee@glenncoffee.com Counsel for Plaintiff the State of Oklahoma

FOLIART, HUFF, OTTAWAY &

BOTTOM Larry D. Ottaway Amy Sherry Fischer 201 Robert S. Kerr Avenue, 12th Floor Oklahoma City, OK 73102 larryottaway@oklahomacounsel.com amyfischer@oklahomacounsel.com Attorneys for Defendants Johnson & Johnson, Janssen Pharmaceuticals, Inc., Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc., and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a/ Janssen Pharmaceuticals, Inc and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a/ Janssen Pharmaceuticals, Inc.

O'MELVENY & MYERS LLP Charles C. Lifland Jennifer D. Cardelús 400 S. Hope Street Los Angeles, CA 90071 clifland@omm.com jcardelus@omm.com *Counsel for Defendants Janssen* Janssen Pharmaceuticals, Inc and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a/ Janssen Pharmaceuticals, Inc.

O'MELVENY & MYERS LLP Stephen D. Brody David K. Roberts 1625 Eye Street NW Washington, DC 20006 sbrody@omm.com droberts2@omm.com *Counsel for Defendants Janssen Pharmaceuticals, Inc., Johnson & Johnson, Janssen Pharmaceutica, Inc. n/k/a/ Janssen Pharmaceuticals, Inc., and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a/ Janssen Pharmaceuticals, Inc. and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a/ Janssen Pharmaceuticals, Inc.*

DECHERT, LLP

Sheila Birnbaum Mark S. Cheffo Hayden A. Coleman Paul A. LaFata Jonathan S. Tam Erik Snapp Three Bryant Park 1095 Avenue of the Americas New York, New York 10036 sheila.birnbaum@dechert.com mark.cheffo@dechert.com hayden.coleman@dechert.com paul.lafata@dechert.com jonathan.tam@dechert.com erik.snapp@dechert.com Counsel for Purdue Pharma L.P., Purdue Pharma Inc. and The Purdue Frederick Company Inc.

GABLEGOTWALS Robert G. McCampbell Nicholas V. Merkley Ashley E. Quinn One Leadership Square, 15th Fl. 211 North Robinson Oklahoma City, OK 73102-7255 RMcCampbell@Gablelaw.com Pharmaceuticals, Inc., Johnson & Johnson, Janssen Pharmaceutica, Inc. n/k/a/ Janssen Pharmaceuticals, Inc., and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a/ Janssen Pharmaceuticals, Inc.

LYNN PINKER COX & HURST, LLP Eric Wolf Pinker John Thomas Cox III Lynn Pinker Cox & Hurst, LLP 2100 Ross Avenue, Suite 2700 Dallas, TX 75201 epinker@lynnllp.com tcox@lynnllp.com *Counsel for Purdue Pharma L.P., Purdue Pharma Inc. and The Purdue Frederick Company Inc.*

MORGAN, LEWIS & BOCKIUS LLP Steven A. Reed Harvey Bartle IV Rebecca Hillyer Lindsey T. Mills 1701 Market Street Philadelphia, PA 19103-2921 steven.reed@morganlewis.com harvey.bartle@morganlewis.com rebeccahillyer@morganlewis.com lindsey.mills@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.*

MORGAN, LEWIS & BOCKIUS LLP Brian M. Ercole 200 S. Biscayne Blvd., Suite 5300 Miami, FL 33131 brian.ercole@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. NMerkley@Gablelaw.com AQuinn@Gablelaw.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.

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AP	PL	ICA	TI	ON	



OUT OF STATE ATTORNEY REGISTRATION

David Steve		, A	Applicant,	respectfully	represents:
1. Applicant is an			er of the	law firm of	Lynn Pinker
<u>Cox & Hurst, LLP</u>	("LPCH")				
with its principal of	ffices located a		s Avenue)
Dallas		Dallas ,	TX	75201	
City	1	County	State	Zip Code	, ;
(214) 981-3800	. (214) 981-3813	. (21	4)981-383	9.
Telephone (Firm)		ne (Applicant's Direct			<u> </u>
dcoale@lynnllp.cc E-mail Address (Applicant)					t from above,
please provide the	e following:				
		Ma	iling Address		
City	,,	County	,State	_,Zip Co	de ,
City		Jouny	0.0.0	p 00	
2. Applicant is	admitted to	practice and	is a me	ember in g	ood standing
(certificates of goo	od standing att	ached) of the	bar(s) of	the highest	state court(s)
of the following sta	ate(s):				
State			D	ate of Admis	ssion
Texas			N	ovember 5,	1993

3. Applicant is admitted to practice before the following United States District Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States, and/or other tribunals on the dates indicated for each, and is presently a member in good standing of the bars of said courts:

DAVID STEVEN COALE APPLICATION

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Exhibit A

State Bar of Texas	November 5, 1993	
United States District Court for the Northern District of Texas	December 16, 1994	
United States District Court for the Eastern District of Texas	January 3, 1995	
United States District Court for the Southern District of Texas	April 19, 1995	
United States District Court for the Western District of Texas	April 21, 1995	
United States Court of Appeals – 3rd Circuit	May 26, 2015	
United States Court of Appeals – 5th Circuit	February 15, 1995	
United States Court of Appeals – 9th Circuit	March 29, 2007	
United States Court of Appeals - 10th Circuit	May 4, 2018	

4. Have you ever been suspended or disbarred in any court except as hereinafter provided (Give particulars; e.g. court, jurisdiction, date): <u>No</u>

5. Are you currently subject to any pending disciplinary proceedings by any organization with authority to discipline attorneys at law except as hereinafter provided (Give particulars; e.g. court, discipline authority, date, status): <u>No</u>

6. Have you ever received public discipline including, but not limited to, suspension or disbarment, by any organization with authority to discipline attorneys at law except as hereinafter provided (Give particulars; e.g. court, discipline authority, type of discipline, date, status): No

7. Have you ever had any certificate or privilege to appear and practice before any regulatory or administrative body suspended or revoked except as hereinafter provided (Give particulars; e.g. administrative body, date, status of suspension or reinstatement):

No

8. Applicant seeks admission to practice in the State of Oklahoma in the following matter (give particulars; e.g. caption of case, court or agency, type of matter, party to be represented): Note - A separate application is to be submitted for each matter in which the applicant seeks admission! State of Oklahoma, ex rel., Mike Hunter, Attorney General of Oklahoma v. (1) Purdue Pharma, L.P., (2) Purdue Pharma, Inc., (3) The Purdue Frederick Company, (4) Teva Pharmaceuticals USA, Inc., (5) Cephalon, Inc., (6) Johnson & Johnson, (7) Janssen Pharmaceuticals, Inc., (8) Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc., (9) Janssen Pharmaceutica, Inc., n/k/a Janssen Pharmaceuticals, Inc., (10) Allergan, PLC f/k/a Actavis PLC, f/k/a Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc., (11) Watson Laboratories, Inc., (12) Actavis, LLC, and (13) Actavis Pharma, Inc., f/k/a Watson Pharma, Inc.; Case No. CJ-2017-816, in the District Court of Cleveland County, State of Oklahoma; This is a fraud and consumer protection action. LPCH seeks to represent (1) Purdue Pharma, L.P., (2) Purdue Pharma, Inc., and (3) The Purdue Frederick Company.

9. The Oklahoma Bar Association member who is counsel of record for Applicant in this matter is:

Sanford	С.	Coats	18268	
First Name	Middle Name	Last Name	O.B.A. Number	
324 N. Robinsc Mailing Addr	n Avenue, Suite 100 ess), <u>Oklahoma City,</u> _{City}	<u>OK</u> , <u>73102</u> State Zip Co	, ode
(405) 235-7700 Telephone Number	, <u>(405) 239-66</u> Fax Number		ts@crowedunlevy nail Address	<u>/.com</u>
10. The follow	ing accurately repre	sents the names	of each party in	this matter
and the names	and addresses of	each counsel of	record who appe	ear for that
party:				

PARTY NAME(S)	COUNSEL NAME(S)	ADDRESS OF COUNSEL
Purdue Pharma L.P. Purdue Pharma Inc. The Purdue Frederick Company Inc.	Sanford C. Coats Joshua D. Burns	324 N. Robinson Avenue, Suite 100 Oklahoma City, OK 73102
Teva Pharmaceuticals USA, Inc. Cephalon, Inc. Watson Laboratories, Inc. Actavis LLC Actavis Pharma, Inc. f/k/a Watson Pharma, Inc.	Robert G. McCampbell Nicholas Merkley	One Leadership Square 15th Floor, 211 North Robinson Oklahoma City, OK 73102-7255
Johnson & Johnson Janssen Pharmaceuticals, Inc. Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc. Janssen Phannaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc.	Benjamin H. Odom John Sparks	HiPoint Office Building 2500 McGee Drive Suite 140 Oklahoma City, OK 73072
Johnson & Johnson Janssen Pharmaceuticals, Inc. Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc. Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc.	Larry D. Ottaway Amy Sherry Fischer	201 Robert S. Kerr Avenue 12 th Floor Oklahoma City, OK 73102
State of Oklahoma, ex rel., Mike Hunter, Attorney General of Oklahoma	Michael Burrage Reggie Whitten	512 N. Broadway Avenue Suite 300 Oklahoma City, OK 73102

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÷	Mike Hunter Abby Dillsaver Ethan A. Shaner	313 N.E. 21st Street, Oklahoma City, OK 73105
	Bradley E. Beckworth Jeffrey J. Angelovich	512 N. Broadway Avenue Suite 200 Oklahoma City, OK 73102
	Glenn Coffee	915 N. Robinson Avenue Oklahoma City, OK 73102

11. Applicant certifies that he shall be subject to the jurisdiction of the courts and disciplinary boards of this state with respect to the laws of this state governing the conduct of attorneys to the same extent as a member of the Oklahoma Bar Association.

12. Applicant understands and shall comply with the standards of professional conduct required of members of the Oklahoma Bar Association.

13. Applicant has disclosed in writing to the client that the Applicant is not admitted to practice in this jurisdiction and the client has consented to such representation.

I, <u>David Steven Coale</u>, do hereby swear/affirm under penalty of perjury that the assertions of this application are true:

I am the Applicant in the above referenced matter; I have read the foregoing and know the contents thereof; the same is true of my own knowledge except as to those matters therein stated on information and belief, and as to those matters I believe them to be true.

I further certify that I am subject to the jurisdiction of the Courts and disciplinary boards of this state with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the Oklahoma Bar Association; I understand and shall comply with the standards of professional conduct required by members of the Oklahoma Bar Association; and that I am subject to the disciplinary jurisdiction of the Oklahoma Bar Association with respect to any of my actions occurring in the course of such appearance.

DATED this 18th day of February, 2019.

Applicant

Mail with check or money order (payable to the OBA) to:

Out-of-State Attorney Registration Oklahoma Bar Association P.O. Box 53036 Oklahoma City, OK 73152-3036

:

Form 200B

STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

February 11, 2019

Re: Mr. David S. Coale, State Bar Number 00787255

To Whom It May Concern:

This is to certify that Mr. David S. Coale was licensed to practice law in Texas on November 05, 1993, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension from the practice of law.

This certification expires 30 days from the date, unless sooner revoked or rendered invalid by operation of rule or law.

Sincerely,

James Ehler Interim Chief Disciplinary Counsel LA/web



P.O. BOX 12487, CAPITOL STATION, AUSTIN, TEXAS 78711-2487, 512.427.1350; FAX: 512.427.4167

Exhibit **B**

The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

I, BLAKE HAWTHORNE, Clerk of the Supreme Court of Texas, certify that the records of this office show that

David S. Coale

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 5th day of November, 1993.

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

David S. Coale

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



No. 0892C.1

IN TESTIMONY WHEREOF witness my signature

and the seal of the Supreme Court of Texas at the City of Austin, this, the

11th day of February, 2019.

BLAKE HAWTHORNE, Clerk

Clerk, Supreme Court of Texas

This certification expires thirty days from this date, unless sooner revoked or rendered invalid by operation of rule or law.



Certificate of Compliance

Oklahoma Bar Association 1901 North Lincoln Boulevard Post Office Box 53036 Oklahoma City, Oklahoma 73152-3036

The Oklahoma Bar Association, in response to the application of out-ofstate attorney, submits the following certificate pursuant to 5 O.S. Ch.1 App.1, Art. II

- 1. Applicant has submitted a signed application of out-of-state attorneys, certificate(s) of good standing, and the non-refundable application fee pursuant to the Rules Creating and Controlling the Oklahoma Bar Association, 5 O.S. Ch. 1, App. 1, Art. II.
- 2. Date of Application: February 19, 2019
- 3. Application Number: 2019-139
- 4. Applying Attorney: David Steven Coale Lynn Pinker Cox & Hurst, LLP 2100 Ross Avenue, Suite 2700 Dallas, TX 75201
- 5. The Application was: **GRANTED**

Dated this 19th day of February, 2019.



Gina L. Hendryx, General Counsel Oklahoma Bar Association

Exhibit C