



IN THE DISTRICT COURT OF CLEVELAND COUNTY  
STATE OF OKLAHOMA

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

vs.

- (1) PURDUE PHARMA L.P.;
  - (2) PURDUE PHARMA, INC.;
  - (3) THE PURDUE FREDERICK COMPANY;
  - (4) TEVA PHARMACEUTICALS  
USA, INC.;
  - (5) CEPHALON, INC.;
  - (6) JOHNSON & JOHNSON;
  - (7) JANSSEN PHARMACEUTICALS, INC.;
  - (8) ORTHO-McNEIL-JANSSEN  
PHARMACEUTICALS, INC., n/k/a  
JANSSEN PHARMACEUTICALS, INC.;
  - (9) JANSSEN PHARMACEUTICA, INC.,  
n/k/a JANSSEN PHARMACEUTICALS,  
INC.;
  - (10) ALLERGAN, PLC, f/k/a ACTAVIS PLC,  
f/k/a ACTAVIS, INC., f/k/a WATSON  
PHARMACEUTICALS, INC.;
  - (11) WATSON LABORATORIES, INC.;
  - (12) ACTAVIS LLC; and
  - (13) ACTAVIS PHARMA, INC.,  
f/k/a WATSON PHARMA, INC.,
- Defendants.

STATE OF OKLAHOMA } S.S.  
CLEVELAND COUNTY }  
**FILED** In The  
Office of the Court Clerk  
APR 26 2019

In the office of the  
Court Clerk MARILYN WILLIAMS

Case No. CJ-2017-816

Honorable Thad Balkman

**JANSSEN DEFENDANTS' JOINDER TO SELECT MOTIONS IN LIMINE FILED BY  
THE TEVA DEFENDANTS**

Defendants Janssen Pharmaceuticals, Inc. (“Janssen”)<sup>1</sup> and Johnson & Johnson (“J&J”) (collectively, “Janssen Defendants”) respectfully submit this Joinder to the following Motions *in Limine* filed by the Teva and Actavis Defendants<sup>2</sup> on April 26, 2019:

- To Impose Rules on Courtroom Conduct and Establish Trial Procedures;
- To Exclude New Opinions by Experts or Expert Reliance on New Evidence;
- To Exclude Evidence Regarding Defendants’ Political Activity and Alleged Public Relations Campaigns;
- To Exclude References to Defendants’ Litigation Strategy and Conduct; and
- To Exclude Lay Witness Testimony that is Not Based on Personal Knowledge.

For the reasons set forth in the Teva and Actavis Defendants’ Motions, the Janssen Defendants agree that the Court should enter orders (1) imposing rules on courtroom conduct and establishing trial procedures, and excluding (2) new opinions by experts or expert reliance on new evidence, (3) evidence regarding defendants’ political activity and alleged public relations campaigns, (4) references to defendants’ litigation strategy and conduct, and (5) lay witness testimony not based on personal knowledge. The Janssen Defendants’ hereby adopt the arguments of the Teva and Actavis Defendants and request the same relief. 12 O.S. § 2010(C).

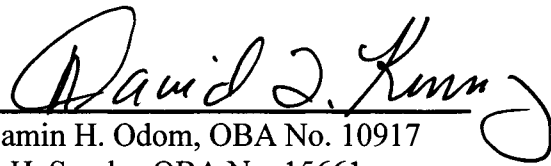
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<sup>1</sup> “Janssen” also refers to Janssen Pharmaceuticals, Inc.’s predecessors, Ortho-McNeil-Janssen Pharmaceuticals, Inc. and Janssen Pharmaceutica, Inc.

<sup>2</sup> “Teva and Actavis Defendants” refers collectively to Teva Pharmaceuticals USA, Inc., Cephalon, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc.

Dated: April 26, 2019

Respectfully submitted,

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**CERTIFICATE OF MAILING**

Pursuant to Okla. Stat. tit. 12, § 2005(D), and by agreement of the parties, this is to certify on April 26, 2019, a true and correct copy of the above and foregoing has been served via electronic mail, to the following:

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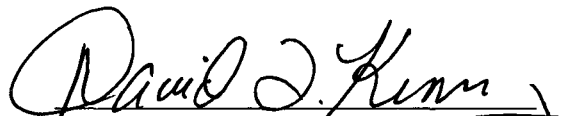
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