



IN THE DISTRICT COURT OF CLEVELAND COUNTY  
STATE OF OKLAHOMA

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

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.,

Defendants.

**For Judge Balkman's  
Consideration**

Case No. CJ-2017-816  
Honorable Thad Balkman

William C. Hetherington  
Special Discovery Master

STATE OF OKLAHOMA } S.S.  
CLEVELAND COUNTY }

**FILED**

APR 18 2019

In the office of the  
Court Clerk MARILYN WILLIAMS

**MOTION TO SEAL CONFIDENTIAL FILING AND REFILE A REDACTED VERSION**

The Teva Defendants, Teva Pharmaceuticals USA, Inc. (“Teva USA”) and Cephalon, Inc. (“Cephalon”), and the Actavis Defendants, Watson Laboratories, Inc. (“Watson”), Actavis LLC (“Actavis LLC”), and Actavis Pharma, Inc. (“Actavis Pharma”), f/k/a Watson Pharma, Inc, submit this Motion to Seal Exhibit 4 of its prior filing. In support of this Motion, Defendants state:

1. On April 16, 2018, the parties entered an Amended Protective Order. The Amended Protective Order sets out the process for filing confidential documents. Confidential documents and references to the same are to be filed under seal with the Court:

*Any party wishing to file a document designated as Confidential or Highly Confidential -Attorneys' Eyes Only Information in connection with a motion, brief or other*

*submission to the Court, or file a motion, brief, or other submission containing Confidential or Highly Confidential-Attorneys' Eyes Only Information, may file such motion, brief or other submission to the Court under seal pursuant to 12 O.S. § 3226(C)(2) and 51 O.S. §§ 24A.29-30 and must also file a public version of such motion, brief or other submission to the Court wherein all Confidential or Highly Confidential-Attorneys' Eyes Only Information is redacted.*

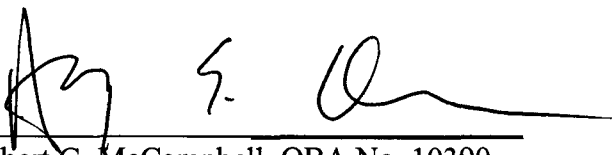
Amended Protective Order ¶ 13.

2. On April 9, 2019, the Teva Defendants and Actavis Defendants inadvertently filed a Reply to the State's Omnibus Brief on Severance which contained the State's unredacted Motion to Designate Alleged Confidential Documents and Brief and Support. This was inadvertent, Exhibit 4 should have been filled in its redacted form.

3. The Teva and Actavis Defendants move to seal Exhibit 4 and replace it with a properly redacted versions of the same.

Pursuant to the Amended Protective Order, Teva Defendants request the Court seal the currently filed version and order the same be removed from public access and further allow the resubmission of a properly redacted version of the same document.

Dated: April 18, 2019



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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was emailed this 18th day of April, 2019, to the following:

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