



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** In The  
Office of the Court Clerk

MAY 02 2019

In the office of the  
Court Clerk MARILYN WILLIAMS

**OBJECTIONS OF TEVA DEFENDANTS TO  
ADMINISTRATIVE ORDER REGARDING MEDIA**

Come now Defendants, Teva Pharmaceuticals, USA, Inc., Cephalon, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc., f/k/a Watson Pharma, Inc. (collectively, "Teva and Actavis Defendants"), and offer the following objections to the Administrative Order entered by the Court on April 16, 2019 regarding media in the Courtroom.

First, the Teva and Actavis Defendants, as if re-stated fully herein, renew all previous objections relative to the Court's April 16, 2019 Order as well as the original Order of August 22, 2018 relative to the presence of cameras and media in the Courtroom.

In addition, the Teva and Actavis Defendants offer the following more specific objections to certain sections of the Order:

1. **Policies - paragraph 2.** This section is intended to prevent persons from transmitting video or photographs without permission. Regardless of permission, once trial video or pictures is/are out on the internet, there is no way to recapture them. Thus, the Teva and Actavis Defendants would propose that the Court and/or the Special Master on this subject place some kind of additional restriction or responsibility on OPUBCO to police such activity.

2. **Procedures- paragraph 1.** This paragraph addresses OPUBCO's requests for use and placement of cameras and personnel. Those requests are to be submitted to the Special Master, but there is no requirement those requests are also to be sent to the parties. The Teva and Actavis Defendants request that such notice also be sent to the parties so that any comment or objection by any party might be entertained.

3. **Procedures – paragraph 3.** This paragraph addresses still photography, referencing only one camera at a time. The Teva and Actavis Defendants have concerns similar to those in paragraph 2 above with regard to notification so that any necessary comment or objection from the parties can be urged.

4. **Procedures- paragraph 7.** One issue here is with the phrase “free to record anyone who participates” in the trial, which seems relatively undefined. It could potentially include recording people who are just watching, administrative staff (the parties' or the Court's), or essentially anyone. Thus, the Teva and Actavis Defendants would simply ask for clarification, as it seems potentially intrusive upon those who are not actually “participating” in the trial in the classic sense.

5. Further, there is some seeming ambiguity in the phrase “tripod mounted cameras shall not be moved while the Court is in session”. The Teva and Actavis Defendants believe that the Court intended for this to mean that cameras, once placed, can only be taken down when the Court breaks for the day, which makes sense. However, some clarification may be needed, as this could be taken to mean cameras can be moved over a break. The Teva and Actavis Defendants would urge that once camera placement is decided upon, the cameras remain in the place each day until the end of trial - the only exception being that they can be taken down at the end of each day and then replaced and in position before the next day’s proceedings begin, so as to minimize distractions.

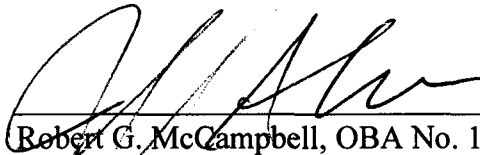
6. **Procedures – paragraph 8.** This paragraph provides that “seating will be reserved for the media”. The Teva and Actavis Defendants understand that such will be necessary pursuant to carrying out the Court’s Orders. The Teva and Actavis Defendants would respectfully request that a determination of the parties’ space and seating requirements (both in number and location in the courtroom) be determined before seating is reserved for any media.

The Teva and Actavis Defendants would further request that seating reserved for the media be situated such that the defense teams can have the conversations necessary to defend the case without concern of being overheard by members of the media on confidential matters.

Dated: May 2, 2019.

(SIGNATURE PAGE TO FOLLOW)

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

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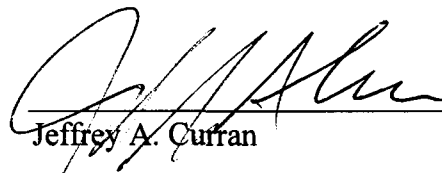
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