



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

MAY 03 2019

IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

<p>STATE OF OKLAHOMA, ex rel., MIKE HUNTER, ATTORNEY GENERAL OF OKLAHOMA,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>PURDUE PHARMA L.P., <i>et al.</i>,</p> <p style="text-align: center;">Defendants.</p>	<p style="text-align: right;"><i>In the office of the Court Clerk MARILYN WILLIAMS</i></p> <p>Case No. CJ-2017-816</p> <p>Judge Thad Balkman</p> <p>William C. Hetherington Special Discovery Master</p>
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**DEFENDANTS JANSSEN PHARMACEUTICALS, INC.
AND JOHNSON & JOHNSON'S MOTION *IN LIMINE* NO. 1
TO EXCLUDE INFLAMMATORY STATEMENTS**

REDACTED VERSION

THIS DOCUMENT WAS FILED IN ITS ENTIRETY APRIL 26, 2019,
UNDER SEAL
PER COURT ORDER DATED APRIL 16, 2018

Defendants Janssen Pharmaceuticals, Inc. (“Janssen”)¹ and Johnson & Johnson (“J&J”), move this Court for an order excluding from trial inflammatory statements, such as referring to Janssen or J&J as criminals or kingpins or references to the Vietnam War, terrorism, body bags, or Mother Teresa. Such statements should be excluded because they are irrelevant to the issues to be decided at trial, unfairly prejudicial, and would unnecessarily prolong the trial. *See* 12 O.S. §§ 2401, 2402, 2403. Janssen and J&J accordingly respectfully request that their Motion *in Limine* be granted, and for such other relief as the Court deems just and proper.

BRIEF IN SUPPORT

In support of this Motion *in Limine*, Janssen and J&J show the following:

I. INTRODUCTION

“Depraved criminals.” “Opioid Mafia.” “The kingpin behind this Public Health Emergency.” “Terrorist”. “Body bags.” The State has used all of this inflammatory name-calling and rhetoric, and much more, to vilify Janssen and J&J in this case. Not one of these provocative statements has any bearing on the State’s claims here. But more than merely irrelevant, these statements are unduly prejudicial—and designed to be so. These types of statements serve no purpose but to put on a show for the press and public. This Court must exclude these openly prejudicial statements at trial—not because they will prejudice the factfinder in this case, but because they may taint hundreds of other cases pending across the country. This Court’s decision to allow cameras in the courtroom will expose the public, including hundreds of thousands of potential jurors in *other* matters, to the evidence and arguments presented here. This Court should

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

therefore exclude all inflammatory statements that, in the context of a jury trial, it would find too prejudicial and of too limited probative value to admit.

II. ARGUMENT

The State has repeatedly engaged in inflammatory name-calling and rhetoric:

- The State's Petition begins with the following quote: "The most depraved criminals are often the dispensers of habit-forming drugs." Petition (June 30, 2017) at 1.
- [REDACTED]
- Plaintiff's expert witness, Dr. Andrew Kolodny, tweeted to the public: "Many will be surprised to learn that JnJ, same company that makes band aids and baby shampoo, has been an opioid 'kingpin.'" Ex. A, Andrew Kolodny (@AndrewKolodny) Twitter (Mar. 12, 2019, 5:45 am), <https://twitter.com/andrewkolodny/status/1105449861657317376>. [REDACTED]
- In his deposition, Dr. Kolodny also referred to the Pain Care Forum as "the 'Opioid Mafia.'" See Ex. C, Mar. 7, 2019 Deposition Tr. of Andrew Kolodny at 220:16-221:4.
- Quoting a letter former Governor Chris Christie sent to President Trump, State counsel stated, "Our people are dying. More than 175 lives are lost every day. If a terrorist organization was killing 175 Americans a day on American soil, what would we do to stop them[?] We would do anything and everything. We must do the same to stop the dying cause from within. I know you will." Counsel proceeded, "Governor Christie's words say it pretty clearly. . . . [W]hat can we do to stop people being put in hospitals, treatment facilities, and body bags[?]" Ex. D, Apr. 19, 2018 Hr. Tr. at 46:13-47:9.
- At one hearing, State counsel claimed: "We are losing every year almost as many people who died in the Vietnam War in one year, and it is getting worse. There are projections that by 2025, we'll be losing 95,000 people a year, annually. But for every person that dies, there's probably a thousand families who are going through the pain of having an addicted one who has not yet died." Ex. E, Mar. 9, 2018 Hr. Tr. at 92:15-93:1.
- "This is not a normal case, as you know. It is literally life and death. . . . And this really is a deal where people are dying every day." Ex. F, Aug. 10, 2018 Hr. Tr. at 36:14-24.

• [REDACTED]

The Court should exclude these types of inflammatory statements from trial.

The inflammatory statements are not relevant. Inflammatory statements like those identified above serve a single, illegitimate purpose: to vilify Janssen and J&J. The Court should not admit such statements. Evidence is admissible only if it is “relevant”—that is, if it “tend[s] to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence.” 12 O.S. §§ 2401, 2402; *Hohenberger v. United States*, 660 F. App’x 637, 641 (10th Cir. 2016) (affirming exclusion of irrelevant evidence at bench trial).² The State may present factual evidence to support its claims, and it can make appropriate legal arguments based on that evidence, but these statements—name-calling, references to the Vietnam War, terrorism, and the mafia—are not that. Incendiary emotional characterizations do not assist the factfinder in making decisions.

The inflammatory statements are unduly prejudicial. If this case were to be decided by a jury, this Court would surely exclude these inflammatory statements because they serve an inherently prejudicial purpose: to inflame visceral emotional reactions by characterizing Janssen and J&J as criminals responsible for acts equated with terrorism. See 12 O.S. § 2403³; *Hain v.*

² Because Sections 2401, 2402, and 2403 track their federal counterparts, Rules 401, 402, and 403 of the Federal Rules of Evidence, this Court can and should look to federal cases interpreting those federal rules as persuasive authority. See *Covel v. Rodriguez*, 2012 OK 5, ¶8, 272 P.3d 705, 709 (“Federal court decisions may be examined for persuasive value when they construe federal evidence rules with language substantially similar to that in [Oklahoma’s] evidence statutes.”).

³ Putting aside the Evidence Code, Oklahoma’s Rules of Professional Conduct further counsel in favor of granting this Motion. See 5 O.S. § 3 (“It is the duty of an attorney . . . [t]o abstain from

State, 1996 OK CR 26, ¶45, 919 P.2d 1130, 1143 (evidence that “tends to elicit an emotional rather than rational judgment” is unfairly prejudicial and should therefore be excluded); *Sykes v. State*, 1951 OK CR 154, 238 P.2d 384, 387 (reference to defendant as a “criminal” and “murderer” was unfairly prejudicial); *Bird v. Glacier Elec. Coop., Inc.*, 255 F.3d 1136, 1149–52 (9th Cir. 2001) (fundamental fairness offended where breach of contract defendant’s conduct linked to legacy of injustice against Native Americans, including references to “Custer massacre” and repeated analogies to “killing” by cavalry). Though some courts hold that prejudice exclusions are unnecessary in bench trials, *see, e.g., United States v. Kienlen*, 349 F. App’x 349, 351 (10th Cir. 2009), those decisions have little application here where the concern is not about the judge in this case but about exposing unduly prejudicial information to millions of Americans, including countless prospective jurors in hundreds of matters pending against Janssen and J&J across the country. The prejudice from inflammatory rhetoric designed to stoke emotion will not stop at the courthouse steps; it will infect each and every opioid-related trial that proceeds after this one. The Court should therefore bar any such evidence. *See State v. Miller*, 165 A.2d 829, 831 (N.J. App. Div. 1960) (“Even in a trial without jury, a defendant should not be required to contend with inadmissible evidence, where it appears that it may have a prejudicial effect.”).

The inflammatory statements would waste time. Unfairly prejudicial statements in any event should be excluded under Rule 2403 because it will cause undue delay—wasting the Court’s time and resources on irrelevant and inflammatory statements that Janssen and J&J will have to then address and rebut. 12 O.S. § 2403; *Glaros v. H.H. Robertson*, 797 F.2d 1564, 1573 (Fed. Cir.

all offensive personalities, and to advance no fact prejudicial to the honor or reputation of a party or witness unless required by the justice of the cause with which he is charged.”).


1986) (excluding evidence where admission “would have injected frolics and detours and ... required introduction of counter-evidence, all likely to create side issues . . .”).

III. CONCLUSION

For all these reasons, the Court should grant Janssen and J&J’s Motion *in Limine* and issue an order barring the State from making inflammatory statements, such as calling Janssen or J&J criminals or kingpins or making references to the Vietnam War, terrorism, or Mother Teresa.

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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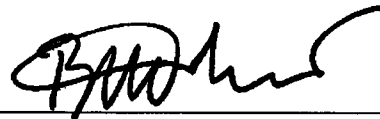
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EXHIBIT A



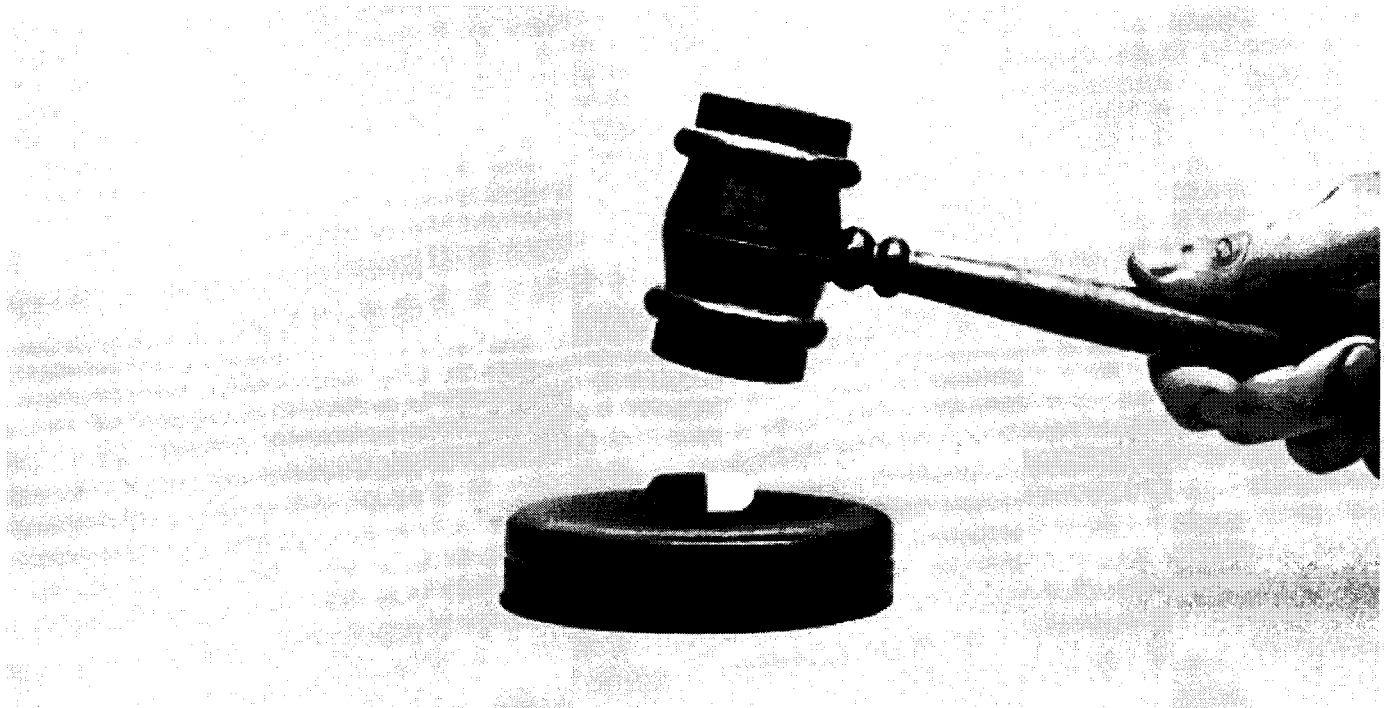
Andrew Kolodny

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Follow



Many will be surprised to learn that JnJ, same company that makes band aids and baby shampoo, has been an opioid "kingpin." See-Exclusive: Lawsuit says Johnson & Johnson was opioid "kingpin"



Oklahoma says Johnson & Johnson was the "kingpin" behind the opioid crisis

The opioid crisis is bigger than Purdue Pharma.

[axios.com](https://www.axios.com)

5:45 AM - 12 Mar 2019

EXHIBIT B

[FILED UNDER SEAL]

EXHIBIT C

1 IN THE DISTRICT COURT FOR CLEVELAND COUNTY

2 STATE OF OKLAHOMA

3 STATE OF OKLAHOMA, ex. rel.,)

4 MIKE HUNTER, ATTORNEY GENERAL))

5 OF OKLAHOMA,)

6 Plaintiff,)

7 -vs-)

No. CJ-2017-816

8 PURDUE PHARMA, L.P., et al.,)

9 Defendants.)

10

11

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13

VOLUME I

14

DEPOSITION OF ANDREW KOLODNY, M.D.

15

TAKEN ON BEHALF OF THE DEFENDANTS

16

ON MARCH 7, 2019

17

IN OKLAHOMA CITY, OKLAHOMA

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REPORTED BY: KIMI GEORGE, CSR

1 responsible as Cephalon for misrepresentations in
2 that book?

3 A. The sponsor of this book includes
4 organizations that were partners in this effort, and
5 it includes front groups that took money from your
6 client, and it includes other organizations that may
7 do some good work that also took money from your
8 client and participated in this effort. But this was
9 a book underwritten by opioid manufacturers, with the
10 goal of increasing prescribing of opioids, and I
11 believe this book had that impact.

12 And the experts who would have been involved
13 in designing the content of this book were people who
14 had relationships to your client and to other opioid
15 manufacturers, like Purdue Pharma. And so, the
16 content of this book is content that serves the
17 interests of opioid manufacturers and contributed to
18 a public health catastrophe.

19 Q. It also is supported by the American Cancer
20 Society, right?

21 A. There are organizations that -- some
22 organizations that were -- were duped and put
23 their -- put their name on it. The Cancer Action
24 Network of the American Cancer Society is a group
25 that has actually taken money from opioid

1 manufacturers. I don't know if I would call them a
2 front group. I might use the term front group more
3 selectively. But the Cancer Action Network,
4 unfortunately, has been involved in efforts with the
5 Pain Care Forum and has participated in a campaign
6 underwritten by opioid manufacturers. That's --
7 that's what I believe.

8 Q. And they participated in -- the American
9 Cancer Society participated in -- in that campaign?

10 A. The Cancer Action --

11 MR. PATE: Object to form, misstates the
12 testimony.

13 Q. Well, what does that book say? Does it say
14 Cancer Action Network is a supporter of American
15 Cancer Society?

16 MR. PATE: Objection, asked and answered.

17 A. This book lists the American Cancer Society.
18 I happen to know that the Cancer Action Network of
19 the American Cancer Society, which is a lobby arm of
20 the American Cancer Society, took significant money
21 from opioids manufacturers, was involved in this, and
22 has been a member of the Pain Care Forum, which is a
23 group that I think is better described as the "Opioid
24 Mafia." And the Pain Care Forum has included many
25 different groups. It's included opioid

1 manufacturers, distributors, pure front groups, as
2 well as professional societies and other
3 organizations that have been influenced by the money
4 that they were taking.

5 Q. And the American Cancer Society has told you
6 that they were duped by -- into -- into supporting
7 that book, right?

8 A. No, and that's not my -- I don't believe the
9 American Cancer Society was duped. I believe that
10 the Cancer Action Network was one of the
11 organizations that have participated in a
12 multifaceted campaign, and the Cancer Action Network
13 has taken money from opioid manufacturers, and that
14 that funding has supported the Cancer Action
15 Network's opioid advocacy, to a point at which the
16 Cancer Action Network, who one might expect would
17 lobby on behalf of people with cancer, which they
18 should, they were lobbying for people without cancer
19 to be given more opioids.

20 Q. And they're not listed there.

21 A. The American Cancer Society is listed here.
22 Rebecca Kirch, who worked for the Cancer Action
23 Network, is listed here.

24 Q. Let's go on back to Exhibit 13. Prior to
25 2016, what massive and unprecedented marketing

1 campaign did Actavis LLC do?

2 MR. PATE: Object to form, asked and
3 answered.

4 A. So, the specific role of a specific drug
5 maker in this campaign, for me to, you know, answer a
6 question like that, my answer would be misleading
7 because this isn't a campaign that was driven by a
8 single drug maker. This was a campaign that involved
9 actions taken by multiple drug companies.

10 Q. I'm going to repeat my question.

11 A. I'm sorry?

12 Q. I'm going to repeat my question.

13 A. Okay.

14 Q. Prior to 2016, what facts do you have that
15 Actavis LLC engaged in any marketing campaign for its
16 opiates?

17 MR. PATE: Objection, asked and answered.
18 This already referred to sources back in this case
19 and many of the pages have been produced in this
20 case. You're not asking him to memorize all of those
21 documents and provide all of that information to you.
22 If you want him to read all of that stuff to you, we
23 can do that, but I don't think that you want him to
24 do that.

25 BY MR. BARTLE:

EXHIBIT D

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IN THE DISTRICT COURT OF CLEVELAND COUNTY

STATE OF OKLAHOMA

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

Plaintiff,)

vs.) Case No. CJ-2017-816

- (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;)
- (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.)

TRANSCRIPT OF PROCEEDINGS
HAD ON APRIL 19, 2018
AT THE CLEVELAND COUNTY COURTHOUSE
BEFORE THE HONORABLE WILLIAM C. HETHERINGTON, JR.
RETIRED ACTIVE JUDGE AND SPECIAL DISCOVERY MASTER
AND THE HONORABLE THAD BALKMAN
DISTRICT JUDGE

REPORTED BY: ANGELA THAGARD, CSR, RPR

1 addiction is a serious public health issue that must be
2 addressed. Later, it says, Addressing opioid abuse will
3 require collaboration among many stakeholders, and we will
4 continue to work with federal, state, and local officials to
5 support solutions. We are committed to be a part of the
6 ongoing dialogue and to doing our part to find ways to address
7 the crisis.

8 Teva says, We take a multifaceted approach to this complex
9 issue. We work to educate communities and healthcare providers
10 on appropriate medicine use of prescribing. We comply closely
11 with all federal and state regulations regarding these
12 medicines. And through our R&D pipeline, we're developing
13 nonopioid treatments that have the potential to bring relief to
14 patients in chronic pain.

15 Teva says they collaborate closely with other
16 stakeholders, including providers, prescribers, regulators,
17 public health officials, and patient advocates to understand
18 how to prevent prescription drug abuse without sacrificing
19 patients' needs, needed access to pain medicine.

20 I also say with respect to those two defendants, when we
21 filed our motion requesting a settlement judge in this case,
22 you know, one of the issues we said is that this is a crisis
23 where people are dying daily and that there was some urgency in
24 trying figure out potential resolutions that could be agreed to
25 by the parties, even though we may ultimately have to go to the

1 judge and jury to get final resolution on other issues.

2 And one of the things that the defendants said, and I
3 believe it was Johnson & Johnson was that, you know, your
4 Honor, we need to have all the stakeholders involved. You
5 know, to have a real meaningful settlement conversation, we've
6 got to have every stakeholder.

7 Well, the primary stakeholders in the state of Oklahoma
8 are in this room. That's chief law enforcement officer, who's
9 bringing this case on behalf of the State, and that's the
10 defendants who we allege caused this problem.

11 And so what our deposition topic gets to is: What do
12 these stakeholders think needs to be done factually to stop
13 this problem. In the White House Commission report that
14 President Trump Commission Governor Christie said -- this in
15 the first page when he wrote a letter dated November 1, 2017 to
16 the president.

17 He said: Our people are dying. More than 175 lives are
18 lost every day. If a terrorist organization was killing 175
19 Americans a day on American soil, what would we do to stop
20 them. We would do anything and everything. We must do the
21 same to stop the dying cause from within. I know you will.

22 That's an important statement. And in the context of this
23 lawsuit, the stopping ultimately will be in the hands partially
24 of a jury, but ultimately in the hands of Judge Balkman,
25 because in an abatement case like we have, he will be asked if

1 they are found responsible on creating a nuisance, Judge
2 Balkman will be asked to abate that nuisance.

3 The law's very clear on it. He will have to craft a
4 remedy that says, Here's what I think is going to be required
5 to abate the nuisance, and that's a very critical issue in this
6 case. I mean, it is the issue. And Governor Christie's words
7 say it pretty clearly. What would you do, what can we do to
8 stop people being put in hospitals, treatment facilities, and
9 body bags.

10 So when we asked for this deposition, our purpose was to
11 start getting to the defendants' factual views of what they
12 believe needs to happen to abate this nuisance.

13 And your Honor, while the issue of the newspaper ad that
14 Purdue ran, we've resolved that issue on the deposition, that
15 newspaper ad is highly, highly relevant to this topic. And if
16 I may, I'm going to approach?

17 THE COURT: Sure.

18 MR. BECKWORTH: This is a December 14, 2017 ad that
19 Purdue took out in the New York Times, and you can keep that
20 copy if you would like.

21 THE COURT: I have it on the computer. I'm looking
22 right at it.

23 MR. BECKWORTH: Okay. So that's the real one. Some
24 people still read the newspaper. I'm one of them.

25 That ad said some things that are directly on point,

1 acutely on point to the issue that we've noticed here. I'll
2 just read a few of them. Patients' needs and safety have
3 guided our steps. Today it's what has spurred us to redouble
4 our efforts in light -- I'm sorry, in the fight against the
5 prescription and illicit opioid abuse crisis. It's why we're
6 taking action. It's why we're taking action.

7 Let me just stop right there on that first paragraph. I
8 want to address something you're going to hear from us a lot in
9 this case. It's not an opioid abuse crisis. It's an opioid
10 addiction crisis. And that is going to be a very important
11 thing for everyone to understand in this case.

12 They next say, We support recommendations in the
13 President's commission on combatting drug addiction and the
14 opioid crisis and the FDA's opioid action plan. There are too
15 many prescription opioid pills in people's medicine cabinets.

16 I won't read the whole thing to your Honor, but I think
17 there's two statements that we have to really consider here.
18 The first one is in the first line of the third paragraph: Our
19 industry and our company have and will continue to take
20 meaningful action to reduce opioid abuse. And then there's the
21 last one. No one solution will end the crisis, but multiple
22 overlapping efforts will. We want everyone engaged to know you
23 have a partner in Purdue Pharma. This is our fight too.

24 It was in that context that we asked for this deposition.
25 And what we were told is, by Purdue specifically, We don't even

EXHIBIT E

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IN THE DISTRICT COURT OF CLEVELAND COUNTY

STATE OF OKLAHOMA

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

Plaintiff,)

vs.)

Case No. CJ-2017-816

- (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;)
- (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.)

TRANSCRIPT OF PROCEEDINGS
HAD ON MARCH 9, 2018
AT THE CLEVELAND COUNTY COURTHOUSE
BEFORE THE HONORABLE WILLIAM C. HETHERINGTON, JR.
RETIRED ACTIVE JUDGE and DISCOVERY MASTER

REPORTED BY: ANGELA THAGARD, CSR, RPR

1 you'll look back at the Zyprexa case I put there before you,
2 the Court notes, Obviously, you've got to balance the
3 public's -- you've got to take into account litigants' privacy
4 rights in addition to the public's right of -- or interest to
5 see information. And the balance struck should incorporate
6 consideration of the overarching purpose of the discovery
7 process. Discovery involves the use of compulsory process to
8 facilitate orderly preparation for trial, not to educate or
9 titillate the public.

10 We're talking today about a discovery order. When we get
11 to trial and we get issues before the Court and they're in
12 documents before the Court, we can deal with whether or not
13 we're going to seal the record, which is an entirely separate
14 issue than what we're dealing with today.

15 Our procedure actually allows us to designate the
16 documents consistent with what's undisputed Oklahoma law, get
17 them to the plaintiffs, and deal with the issue later, if it is
18 an issue.

19 The plaintiff's objection is based merely on speculation.
20 They're speculating on whether the defendants will
21 overdesignate in this case and saying because they're afraid we
22 may overdesignate, don't give us the protections that 3226
23 undisputedly allows us to have.

24 And I submit, your Honor, if we overdesignate, the
25 protective order provides for a procedure to challenge the

1 designations. And we'll get to that, and your Honor's
2 perfectly capable of resolving that dispute. That's why we
3 have it if it happens. But we shouldn't be denied the
4 protections that are clearly afforded to us by law simply
5 because they're speculating that we may overdesignate or
6 blanket designate.

7 So your Honor, to sum that whole issue up, again, we're
8 here to talk about discovery protections unquestionably
9 permitted by law. These kinds of orders are no doubt favored,
10 especially in complex cases. And so we respectfully submit
11 that the scope provided in our order is warranted under
12 Oklahoma law and should be entered.

13 MR. WHITTEN: May I offer my two cents on behalf of
14 the State of Oklahoma? With all due respect to their
15 arguments, this is not about titillating the public. We are
16 losing every year almost as many people who died in the Vietnam
17 War in one year, and it is getting worse.

18 There are projections that by 2025, we'll be losing 95,000
19 people a year, annually. But for every person that dies,
20 there's probably a thousand families who are going through the
21 pain of having an addicted one who has not yet died.

22 This is not about titillation. This is a public epidemic.
23 It's the largest manmade epidemic in the history of the world.
24 Now, this started in '96. This is not new to them. We've had
25 opioids for thousands of years, and everybody knew they were

1 addictive.

2 They started a fraudulent marketing campaign in '96, and
3 they began to tell doctors that they were not addictive. And
4 the rest is history. We have the graphs that show sales go up,
5 but so do deaths and overdoses. And that's how this epidemic
6 started. It took us 20-something years to get in it. It's
7 probably going to take 50 years to get out of it.

8 Now, the media's not here today. I'm a little bit
9 surprised. But I predict if they get to hide documents in a
10 blanket protective order, we'll see all kinds of newspapers
11 entering appearances in this case. The public does have a
12 right to go on Pacer. They do have a right to see the very
13 documents they're turning over.

14 And from the media attention that everybody knows about,
15 we know exactly what they're going to do. They're going to be
16 wanting to watch this lawsuit proceed. This is not a lawsuit
17 by one injured person or one person that died. The State of
18 Oklahoma is totally innocent here. They had to pay for picking
19 up the pieces for the epidemic they caused. The taxpayers,
20 especially in this time of budgetary crisis, they have a right
21 to watch this litigation proceed.

22 Now, the defense has a right to keep trade secrets
23 protected, but that's exactly what I predict they're going to
24 do. They're trying to hide this from the public, and they
25 should not be allowed to do it. Much of the authority he cites

1 is old authority. I think we all know the recent trend with
2 cases that have just recently come out on matters that are far
3 less important, i.e., a divorce, than this case have shown we
4 don't need these blanket protective orders anymore and they're
5 wrong.

6 And they should have to do it the right way. If it's
7 protected, tell us about it. Other than that, it's wide open,
8 and that's how it should be, your Honor.

9 THE COURT: All right. Thank you.

10 MR. DUCK: There's some confusion about whether we
11 are confused about what this order means, and we're not. We
12 know that the cases you've cited refer to documents that have
13 been filed in the Court. And there's a lot of case law about
14 the public's right to access court filings. We get that.

15 The documents they produce are going to become court
16 filings. We intend to use this evidence early on. And one of
17 the reasons for that is both to inform the Court of the issues
18 of this case, and so the public does have access to that
19 information.

20 So call this what you want to. Place it anywhere along
21 the litigation spectrum. If they're allowed to designate
22 nonconfidential documents confidential, we've got two options:
23 File it under seal, or deal with it with your Honor to get it
24 D-designated. The burden's going to be there no matter what.

25 Our proposal will disincentivize the overdesignation,

EXHIBIT F

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IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

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

Plaintiff,)

vs.)

Case No. CJ-2017-816

- (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;)
- (9) JANSSEN PHARMACEUTICA, INC.)
- n/k/a JANSSEN PHARMACEUTICALS,)
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- (10) ALLERGAN, PLC, f/k/a)
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- 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.)

**TRANSCRIPT OF PROCEEDINGS
HAD ON AUGUST 10, 2018
AT THE CLEVELAND COUNTY COURTHOUSE
BEFORE THE HONORABLE THAD BALKMAN
DISTRICT JUDGE
AND WILLIAM C. HETHERINGTON, JR.
RETIRED ACTIVE JUDGE AND SPECIAL DISCOVERY MASTER**

REPORTED BY: ANGELA THAGARD, CSR, RPR

1 after defeating a motion to quash, and some of those
2 depositions were to happen with literally I think a day or two
3 after the removal was filed.

4 We have re-noticed those to happen next week. There's
5 depositions that we've currently scheduled for August 22nd right on
6 through the 29th. I believe every one of those was one that a
7 motion -- the motion practice had already been ruled upon. So
8 they're clean as far as the dispute has been resolved by Judge
9 Hetherington.

10 So we plan to go forward with those as noticed. And those
11 would be the ones on the far right column that go to August
12 30th. I think -- I don't know, Reggie, if you've got anything
13 else, but I could be real dramatic about it, your Honor, but
14 the truth is it's pretty mundane.

15 We've got a job to do. You've ordered us to do it. And
16 we can't do it if we're beating our heads into a wall. And
17 that is exactly what happened. And I don't mean that
18 colloquially or disrespectful to these guys. They're doing
19 their job. But we have to be able to move forward here.

20 To be in this case as long as we've been in it and not be
21 able to have taken but one deposition, that just doesn't work.
22 And that's not because of the removal; that's because of the
23 process and the way they've acted about it.

24 And the last thing I'll say is with respect to due process
25 or what they're claiming about getting information from us,

1 Judge Hetherington's ruled. We're producing documents. If
2 they don't like the documents we produce, we can have a hearing
3 on the scope of privacy concerns that we have.

4 But we all need to remember that we served these
5 defendants with discovery right after we served this lawsuit.
6 They chose to move for delay then. They asked for a stay of
7 discovery then. They refused to participate in discovery until
8 you ruled in December that they had to.

9 They blew six or seven months, not us. That's not our
10 fault. That was their choice, and they made their bed. We
11 have made no secrets in anything that we've done in this Court
12 or when we were up in the federal court about what we believe
13 to be the sense of dire urgency here.

14 This is not a normal case, as you know. It is literally
15 life and death. Now, I don't think it's fair to say right now
16 that that life and death is caused by these defendants, but
17 that is our allegation. And if we're right and we prove it,
18 then this Court is going to have a tremendously important job
19 to do to fashion a remedy for it.

20 But we think we're right. I think the Court -- your Honor
21 thought we were right enough to let us move to discovery and
22 deny their motions to dismiss. And because of that, we've got
23 to do our job. And this really is a deal where people are
24 dying every day. We've briefed it. You know what we think
25 about it.

1 But these aren't our words. They're their words. And if
2 you'll look at our motion for bifurcation, we provided quotes
3 from each of these defendants or their lawyers admitting that
4 the crisis exists and it is that dire. The question is, what
5 responsibility, if any, did these manufacturers have for it.

6 We've got to get to the truth of that. And all I can tell
7 you is that everybody at this table from the attorney general's
8 office and our team, Mr. Coffee, and everybody else, we're
9 going to give this thing what we've been giving it for a year,
10 which is our heart and soul. But we need help from this Court
11 and Judge Hetherington to let us do that, or we all ought to
12 just pack it in. Thank you.

13 MR. BARTLE: Your Honor, thank you. Harvey Bartle on
14 behalf of the Teva defendants. You know, just as an initial
15 matter, your Honor, with regard to the scheduling order, I
16 mean, that could have been e-mailed to us, this proposed, give
17 us a call. We could have saved probably this Court and
18 everyone about 20 minutes of argument over proposed dates.
19 Just send it to us. We're reasonable people, and we certainly
20 can work on dates. I believe we have.

21 One thing, to address the deposition notices, your Honor,
22 I still am unclear and maybe Mr. Burrage and Mr. Beckworth can
23 address this. As to the pending motions before Judge
24 Hetherington, we filed motion to quash on individuals, third
25 parties, witnesses who were subpoenaed, who we now represent,

EXHIBIT G

[FILED UNDER SEAL]

1 IN THE DISTRICT COURT OF CLEVELAND COUNTY

2 STATE OF OKLAHOMA

3 STATE OF OKLAHOMA, ex rel.,
4 MIKE HUNTER,
ATTORNEY GENERAL OF OKLAHOMA,

5 Plaintiff,

Case Number
CJ-2017-816

6 VS.

7 (1) PURDUE PHARMA L.P.;
8 (2) PURDUE PHARMA, INC.;
9 (3) THE PURDUE FREDERICK COMPANY;
10 (4) TEVA PHARMACEUTICALS USA, INC.;
11 (5) CEPHALON, INC.;
12 (6) JOHNSON & JOHNSON;
13 (7) JANSSEN PHARMACEUTICALS, INC.;
14 (8) ORTHO-McNEIL-JANSSEN
15 PHARMACEUTICALS, INC., f/k/a
16 JANSSEN PHARMACEUTICALS, INC.;
17 (9) JANSSEN PHARMACEUTICA, INC.,
18 f/k/a JANSSEN PHARMACEUTICALS, INC.;
19 (10) ALLERGAN, PLC, f/k/a WATSON
20 PHARMACEUTICALS, INC.;
21 (11) WATSON LABORATORIES, INC.;
22 (12) ACTAVIS, LLC; and
23 (13) ACTAVIS PHARMA, INC.,
24 f/k/a WATSON PHARMA, INC.,

25 Defendants.

VIDEO DEPOSITION OF BRUCE COLLIGEN
TAKEN ON BEHALF OF THE PLAINTIFF
ON NOVEMBER 27, 2018, BEGINNING AT 2:08 P.M.
IN OKLAHOMA CITY, OKLAHOMA

Reported by: Cheryl D. Rylant, CSR, RPR

Video Technician: Gabe Pack

[REDACTED]

[REDACTED]

[REDACTED]

19 (Whereupon, Colligen Exhibit No. 11 was
20 marked for identification and made part of the
21 record.)

22 Q. (By Mr. Beckworth) I'll hand you Exhibit 11.
23 It's a document your company put out. This is a
24 request for proposal that your company put out. If
25 you look on the front page under background, it

1 says --

2 MR. GALIN: Do we have copies --

3 Q. (By Mr. Beckworth) -- in the fifth --

4 MR. GALIN: -- for the other folks?

5 MR. BECKWORTH: I handed you the copies I
6 have.

7 Q. (By Mr. Beckworth) It says --

8 MR. GALIN: I just have one copy.

9 MR. VOLNEY: We have copies.

10 Q. (By Mr. Beckworth) "In fact, as many as one
11 in four patients receiving long-term opioid therapy
12 in the primary care setting struggles with opioid
13 addiction," correct?

14 A. That's what it says.

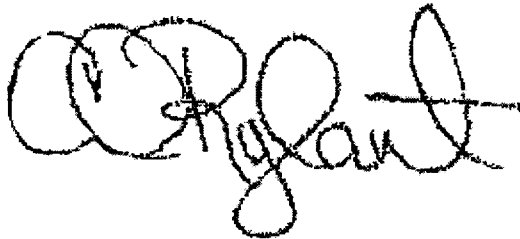
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CERTIFICATE

I, Cheryl D. Rylant, Certified Shorthand Reporter, certify that the above-named witness was sworn, that the deposition was taken in shorthand and thereafter transcribed; that it is true and correct; and that it was taken on November 27, 2018, in Oklahoma City, county of Oklahoma, state of Oklahoma, pursuant to Notice, the Oklahoma Rules of Civil Procedure, and under the stipulations set out, and that I am not an attorney for nor relative of any of said parties or otherwise interested in the event of said action.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal this 28th day of November, 2018.



CHERYL D. RYLANT, CSR, RPR

Certificate No. 1448