



IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

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

Plaintiff,

SEALED
STATE OF OKLAHOMA
CLEVELAND COUNTY
FILED In The
Office of the Court Clerk
MAY 02 2019

for Judge Balkman's
Consideration

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;
- (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.,

In the office of the
Court Clerk MARILYN WILLIAMS

Case No. CJ-2017-816
Honorable Thad Balkman

William C. Hetherington
Special Discovery Master

Defendants

SEALED

DEFENDANTS TEVA PHARMACEUTICALS USA, INC.,
CEPHALON, INC., WATSON LABORATORIES, INC., ACTAVIS LLC,
AND ACTAVIS PHARMA, INC., f/k/a WATSON PHARMA, INC.'S
MOTION FOR SUMMARY JUDGMENT AND BRIEF IN SUPPORT

EXHIBIT 62 FILED UNDER SEAL

EXHIBIT 62

8. During the 1990's, including when APS and AAPM released the 1997 Consensus Statement entitled "The Use of Opioids for the Treatment of Chronic Pain," there existed only a small amount of data concerning long-term efficacy of opioids for chronic non-cancer pain (a situation which still exists today although there is now considerably more data on risk). This to me is a clear indicator of the lack of support for research on pain. Even when there is a lack of conclusive evidence in a medical field, experts should still express their consensus opinions based on the data that does exist at the time.

9. In 1999, I was Chair of the Professional Development Program of APS's Annual Scientific Meeting, where we had symposia for multi-disciplinary and multi-modal approaches to pain therapy, including content that stressed that a limited approach to pain was not enough.

10. In 2008, I joined the APS Board. During my time on the Board, I was aware of industry funds provided for many society activities, including awards to individuals for their pain research or advocacy, "Centers of Excellence" awards to multidisciplinary pain care practices, and small grant programs to help further pain research. However, there was never any representation from industry on the Board and no possibility for influence on Board decision-making as Board members had little or no information concerning exactly what industry sources were contributing how much to APS

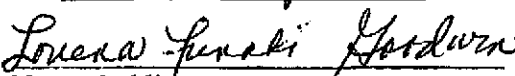
11. I have never seen APS influenced in any way by industry opinions.

Further Affiant Sayeth Naught.



GREGORY TERMAN, MD PHD

Subscribed and Sworn to before me
this 23rd day of April, 2018



Notary Public

