



STATE OF OKLAHOMA } S.S.  
CLEVELAND COUNTY }

IN THE DISTRICT COURT OF CLEVELAND COUNTY  
STATE OF OKLAHOMA

**FILED**

MAY 15 2019

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

Plaintiff,

v.

PURDUE PHARMA L.P., *et al.*,

Defendants.

In the office of the  
Court Clerk MARILYN WILLIAMS

Case No. CJ-2017-816

Judge Thad Balkman

William C. Hetherington  
Special Discovery Master

**DEFENDANTS JANSSEN PHARMACEUTICALS, INC.**  
**AND JOHNSON AND JOHNSON'S MOTION *IN LIMINE* NO. 15 TO EXCLUDE**  
**TESTIMONY OF UNDISCLOSED WITNESSES**

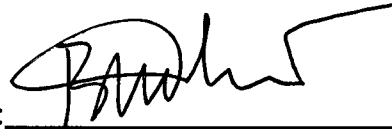
## BRIEF IN SUPPORT

On May 10, 2019, the State subpoenaed Kenneth Mount, of the University of Wisconsin-Madison Office of Legal Affairs, to testify at trial. *See* Exhibit A. The State did not include Mr. Mount on its witness list, and his testimony should be excluded accordingly. *See Aggressive Carriers, Inc. v. Tri-State Motors Transit Co.*, 1997 OK CIV APP 31, 941 P.2d 1101, 1013 (affirming exclusion of witness not included on witness list) (“It is clear the trial court had the power to exclude [the witness’s] testimony unless [the proponent] could show a manifest injustice would occur.”); *Short v. State*, 1999 OK CR 15, ¶ 21, 980 P.2d 1081, 1093 (“The failure of the defense to list Bayless as a witness was a violation of the Discovery Code... The trial courts are empowered to order the appropriate relief for the failure to comply with a discovery order. This relief may include prohibition of a witnesses [sic] testimony.”) (citations omitted).

In addition, the State’s witness list includes six individuals who were not identified in the State’s March 1, 2019 Disclosure of Individuals Likely to Have Discoverable Information that May Be Used to Support the Claims or Defenses. *See* Exhibits B and C. Those previously undisclosed individuals are: Craig Abraham, Elizabeth Wakefield, Holly Abraham, Mark Medina, Tim Mullen, and Eric Thornhill. *See* Exhibit C at 2, 4-5. The State’s failure to include them in its disclosure deprived Defendants of the opportunity to gather evidence potentially relevant to their testimony, and the Court should exclude their testimony accordingly. *Cf. Short*, 1999 OK CR 15, ¶ 21, 980 P.2d at 1093.

Dated: May 15, 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 May 15, 2019, a true and correct copy of the above and foregoing has been served via electronic mail, to the following:

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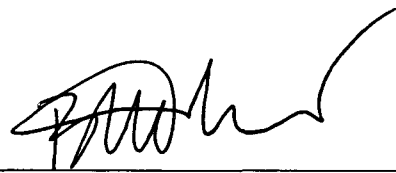
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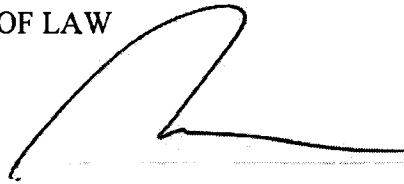


c/o Gesina Seiler Carson  
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GREETINGS – You are Hereby Commanded to appear before the District Court of Cleveland County, Oklahoma, at the courthouse therein, on the 30<sup>th</sup> day of May, 2019 at 9:00am, to testify as a witness in a the above-named action pending in said Court and not depart without leave of the court.

HEREOF FAIL NOT, UNDER PENALTY OF LAW

Issued May 10, 2019



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telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses.”

These Amended Disclosures are based upon information presently known to Plaintiff, and are made without prejudice to Plaintiff’s ability to produce information, documentation, or data that is subsequently discovered. Discovery is ongoing and Plaintiff’s investigation is continuing. As such, Plaintiff anticipates it will learn of additional persons that may have such information. Plaintiff further incorporates into these Amended Disclosures all individuals identified by all other parties to this action in their respective Amended Disclosures, all individuals presented by Defendants for depositions, and reserves the right to depose and rely upon the testimony of all such individuals. Plaintiff reserves the right to amend and/or supplement these Disclosures at any time, and further reserves the right to use any information provided or produced by Defendant who may join this action subsequent to these Amended Disclosures.

By making these Amended Disclosures, Plaintiff does not concede the relevance of any of the information provided or waive any protections available pursuant to any applicable privileges, such as the attorney-client and/or work product privileges.

Dated: March 1, 2019

Respectfully submitted,

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42. Kristi Hoos	Impact of the opioid crisis	To be contacted through Plaintiff's undersigned counsel.

43. Dustin Bailey	Impact of the opioid crisis	To be contacted through Plaintiff's undersigned counsel.
44. Jim Gibson	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
45. Andrew Kolodny	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
46. Ty Griffith	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
47. Claire Nguyen	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
48. Art Van Zee	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
49. Chris Ruhm	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
50. Adriane Fugh-Berman	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
51. Jason Beaman	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
52. Mel Pohl	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
53. Susan Sharp	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
54. Gary Mendell	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
55. Renzi Stone	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
56. Erin Krebs	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
57. Julio Rojas	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.



58. John Duncan	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
59. Bill McAllister	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
60. David Courtwright	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
61. Sam Martin	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
62. Daniel Clauw	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
63. Danesh Mazloomdoost	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
64. Julie Croff	See expert disclosure	To be contacted through Plaintiff's undersigned counsel.
65. Aaron Gilson	KOL/PPSG	Gesina Carson Assistant Attorney General Wisconsin Department of Justice
66. Lisa Robin	KOL/FSMB	Eric Fish 1300 Connecticut Ave, NW Suite 500 Washington, DC 20036
67. Ken Mount	PPSG	Gesina Carson Assistant Attorney General Wisconsin Department of Justice
68. Charles Argoff	Likely possesses knowledge regarding, inter alia, Defendants' marketing campaigns and funding from Defendants, and funding from Defendants.	Christopher Fenlon Hinckley Allen
69. Greg Panico	Johnson & Johnson employee	Johnson and Johnson Defendants

70. Russell Portenoy	Likely possesses knowledge regarding Defendants' marketing campaigns, including Defendants' involvement with the American Pain Foundation and American Academy of Pain Medicine, and funding from Defendants.	S. Amy Spencer Shaheen Gordon
71. Lynn Webster	Likely possesses knowledge regarding Defendants' marketing campaigns, including Defendants' involvement with the American Academy of Pain Medicine, and funding from Defendants.	John Robinson Gorden Rees Scully Mansukhani LLP
72. Scott Fishman	Likely possesses knowledge regarding, inter alia, Defendants' marketing campaigns and funding from Defendants.	John Robinson Gorden Rees Scully Mansukhani LLP
73. Elizabeth Sackler	Descendant of Arthur Sackler (member of the Medical Advertising Hall of Fame)	
74. Mortimer Sackler, Jr.	Purdue Board Member	Purdue Defendants
75. Jon Sackler	Purdue Board Member	Purdue Defendants
76. Pamela Bennett	Purdue former employee	See Deposition
77. Barry Fitzsimmons	Johnson & Johnson employee and corporate representative	Johnson & Johnson Defendants

78. Bruce Moskowitz	Johnson & Johnson corporate representative and former employee	Johnson & Johnson Defendants
79. John Hassler	Teva employee and corporate representative	Teva Defendants
80. Lisa Miller	Purdue employee and corporate representative	Purdue Defendants
81. Keith Darragh	Purdue employee and corporate representative	Purdue Defendants
82. Richard Ponder	Johnson & Johnson employee and corporate representative	Johnson & Johnson Defendants
83. Bruce Colligen	Johnson & Johnson employee and corporate representative	Johnson & Johnson Defendants
84. Bill Grubb	Noramco employee	Daniel Jarcho Alston & Bird LLP 950 F Street, N.W. Washington, D.C. 20004-1404
85. Mike D'Agati	Johnson & Johnson employee	Johnson & Johnson Defendants
86. Patrick Verheyen	Johnson & Johnson employee	Johnson & Johnson Defendants
87. Ronald Kuntz	Johnson & Johnson employee	Johnson & Johnson Defendants
88. Stephen Ives	Purdue Agent	R. Richard Love, III   Partner Conner & Winters LLP 4000 One Williams Center Tulsa, OK 74172-0148
89. Donough McGuire	Purdue employee and corporate representative	Purdue Defendants
90. Kimberly Deem-Eshleman	Johnson & Johnson employee and corporate representative	Johnson & Johnson Defendants
91. Frank Mashett	Johnson & Johnson employee and	Johnson & Johnson Defendants

	corporate representative	
92. Phil Cramer	Purdue employee and corporate representative	Purdue Defendants
93. Richard Fanelli	Purdue employee	Purdue Defendants
94. Fred Tewell	Johnson & Johnson employee	Johnson & Johnson Defendants
95. Kathleen Chupa	Johnson & Johnson former employee	See Deposition
96. Deborah Bearer	Teva employee	Teva Defendants
97. Dolly Judge	Teva employee	Teva Defendants
98. Susan Larijani	Teva employee	Teva Defendants
99. Roxanne McGregor-Beck	Johnson & Johnson employee	Johnson & Johnson Defendants
100. Gary Vorsanger	Johnson & Johnson employee	Johnson & Johnson Defendants
101. Cynthia Condodina	Teva employee	Teva Defendants
102. Larry Westfall	Johnson & Johnson former employee	See deposition
103. Christine Baeder	Teva employee	Teva Defendants
104. Paula Williams	Teva employee	Teva Defendants
105. Frank DeMiro	Johnson & Johnson employee	Johnson & Johnson Defendants
106. Jeff Buel	Johnson & Johnson employee	Johnson & Johnson Defendants
107. Patricia Yap	Johnson & Johnson employee	Johnson & Johnson Defendants
108. Matthew Martin	Noramco employee	Alston Bird LLP 950 F Street, N.W. Washington, D.C. 20004-1404
109. Matt Minardi	Noramco employee	Alston Bird LLP 950 F Street, N.W. Washington, D.C. 20004-1404
110. Burt Rosen	Purdue lobbyist	Purdue Defendants

111. Randy Spokane	Teva employee	Teva Defendants
112. Jim Reilly	Teva employee	Teva Defendants
113. Norman Sandusky	Purdue former sales representative	See Deposition
114. Kristi Jeri Carter	Purdue former sales representative	See Deposition
115. Jennifer Wells	Purdue former sales representative	See Deposition
116. Paul Brinkman	Johnson & Johnson former sales representative	See Deposition
117. Drue Disselhorst	Johnson & Johnson former sales representative	See Deposition
118. William Guthrie	Johnson & Johnson former sales representative	See Deposition
119. Keith Auer	Johnson & Johnson former sales representative	See Deposition
120. Melynda McClure	Johnson & Johnson former sales representative	See Deposition
121. David Everly	Johnson & Johnson former sales representative	See Deposition
122. Stephen Howard	Johnson & Johnson former sales representative	See Deposition
123. Angela Lockhart	Johnson & Johnson former sales representative	See Deposition
124. Jennifer Mason	Purdue former sales representative	See Deposition
125. Cullen Bryant	Purdue former sales representative	See Deposition
126. Brian Vaughn	Teva current sales representative	Teva Defendants
127. Kelly Wolfinbarger	Purdue former sales representative	See Deposition
128. Joanna Samples	Johnson & Johnson sales representative	Johnson & Johnson Defendants
129. Pamela Costa	Teva current sales representative	Teva Defendants

130. Rebecca Disselhorst	Johnson & Johnson former sales representative	See Deposition
131. David Tilley	Johnson & Johnson former sales representative	See Deposition
132. Jason Flanary	Johnson & Johnson employee	Johnson & Johnson Defendants
133. Elizabeth Hightower	Johnson & Johnson former sales representative	See Deposition
134. Eric Wayman	Purdue former sales representative and district manager	See Deposition
135. Tiffany Featherstone	Purdue former sales representative	See Deposition
136. Alan Must	Purdue employee and corporate representative	Purdue Defendants
137. Don Kyle	Purdue employee and corporate representative	Purdue Defendants
138. Thomas Mosley	Teva former sales representative	8843 Belcaro Dr. Edmon, OK 73034-8188
139. Jason Day	Johnson & Johnson current sales representative	Johnson & Johnson Defendants
140. Robyn Kohn	Johnson & Johnson former employee	Marty Sharit 141 Main St. Hackensack, NJ 07601
141. Carly Reisner	American Pain Society	Jack Hynes 10 S LaSalle St, Chicago, IL 60603
142. Philip Siagh	American Academy of Pain Medicine	Jack Bierig 233 S Wacker Dr # 7100 Chicago, IL 60606
143. Melinda Dickson Humphrey	Current Johnson & Johnson employee	Johnson & Johnson Defendants
144. Kelly VanBurkleo	Current Johnson & Johnson employee	Johnson & Johnson Defendants

145. James Wolfbarger	Purdue former sales representative	13255 S 117 <sup>th</sup> East Ct, Broken Arrow, OK 74011-5207
146. Tammy Ohrynowicz	Purdue former sales representative	4733 S Lakewood Ave, Tulsa, OK 74135-6863
147. Angela Trindle	Current Johnson & Johnson employee	Johnson & Jonhson Defendants
148. Tyler Bradley	Purdue former sales representative	3201 SE 32 <sup>nd</sup> St, Oklahoma City, OK 73165-7361
149. Steven Butterfield	Current Johnson & Johnson employee	Johnson & Jonhson Defendants
150. Kelly Hague	Current Johnson & Johnson employee	Johnson & Jonhson Defendants
151. Kathryn Kurin	Purdue former sales representative	Purdue Defendants
152. Shelly Liston	Purdue former sales representative	Purdue Defendants
153. Corporate Representative(s) as duly subpoenaed for Purdue Defendants		Purdue Defendants
154. Corporate Representative(s) as duly subpoenaed for Janssen Defendants		Janssen Defendants
155. Corporate Representative(s) as duly subpoenaed for Teva Defendants		Teva Defendants

**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
	§	The Honorable Thad Balkman
	§	
(1) PURDUE PHARMA L.P.;	§	
(2) PURDUE PHARMA, INC.;	§	William C. Hetherington
(3) THE PURDUE FREDERICK COMPANY;	§	Special Discovery Master
(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.	§	

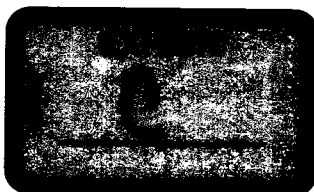
**THE STATE’S TRIAL WITNESS LIST**

In compliance with the Court’s Scheduling Order, below is the State’s Trial Witness List.<sup>1</sup>

The list does not include witnesses that the State may call by deposition designation or for impeachment.

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<sup>1</sup> The State reserves the right to update this list should it discover the existence of additional relevant witnesses that Defendants have failed to disclose. The State also reserves the right to call any witnesses live that Defendants bring to trial.





<b>Last</b>	<b>First</b>	<b>Title/Subject</b>	<b>Contact</b>
Abraham	Craig	Former J&J Sales Employee	J&J Defendants
Abraham	Holly	Former J&J Sales Representative	J&J Defendants
Auer	Keith	Former J&J Sales Representative	J&J Defendants
Baeder	Christine	Teva employee - See deposition	Teva Defendants
Barnhouse	Jenny	Peer Assistance Program Coordinator Oklahoma Board of Nursing - See deposition	State's Counsel
Beaman	Jason	See expert disclosure and depositions	State's Counsel
Beasley	Burl	Director of Pharmacy Operations Oklahoma Health Care Authority - See depositions	State's Counsel
Box	Craig	See deposition	State's Counsel
Buel	Jeff	J&J employee - See deposition	J&J Defendants
Butterfield	Steven	J&J employee	J&J Defendants
Cambra	Lauren	See deposition	See deposition
Chupa	Kati	Former J&J employee	J&J Defendants
Clauw	Daniel	See expert disclosure and deposition	State's Counsel
Colligen	Bruce	J&J employee - See deposition	J&J Defendants
Costa	Pamela	Teva sales representative - See deposition	Teva Defendants
Courtwright	David	See expert disclosure and deposition	State's Counsel
Cramer	Phil	Purdue Employee and Corporate Representative - See deposition	Purdue Defendants
Crawford	Stephen	Chairman of OU Health Sciences Center - See deposition	State's Counsel
Croff	Julie	See expert disclosure and deposition	State's Counsel
Curtis	Byron	Chief Toxicologist Office of Chief Medical Examiner - See deposition	State's Counsel
Day	Jason	J&J Sales Representative	J&J Defendants
Deem- Eshleman	Kimberly	J&J employee	J&J Defendants
Deem- Eshleman	Kimberly	J&J corporate representative	J&J Defendants
Dickson	Melinda	J&J Sales Representative	J&J Defendants
Diesselhorst	Drue	Former J&J Sales Representative	J&J Defendants

Diesselhorst	Rebecca	Former J&J Sales Representative	J&J Defendants
Duncan	John	See expert disclosure and deposition	State's Counsel
Everly	David	Former J&J Sales Representative	State's Counsel
Fishman	Scott	See deposition	John Robinson, Gorden Rees Scully Mansukhani LLP
Flanary	Jason	J&J employee - See deposition	J&J Defendants
Fugh-Berman	Adrian	See expert disclosure and deposition	State's Counsel
Gibson	Jim	See expert disclosure and deposition	State's Counsel
Gilson	Aaron	See deposition	Gesina Carson, Assistant Attorney General, Wisconsin
Griffith	Ty	See expert disclosure and deposition	State's Counsel
Grubb	Bill	Noramco Employee - See deposition	Daniel Jarcho, Alston & Bird LLP
Guthrie	William	Former J&J Sales Representative	J&J Defendants
Hague	Kelly	J&J employee	J&J Defendants
Hassler	John	Teva Employee - See deposition	Teva Defendants
Hassler	John	Teva Corporate Representative - See depositions	Teva Defendants
Hawkins	Jessica	See expert disclosure and deposition	State's Counsel
Herndon	Mike	Chief Medical Officer, Oklahoma Health Care Authority - See depositions	State's Counsel
Hightower	Elizabeth	Former J&J Sales Representative - See deposition	J&J Defendants
Holderread	Bethany	Pharmacy Management Consultants, OU College of Pharmacy - See deposition	State's Counsel
Hoos	Kristi	See deposition	State's Counsel
Howard	Stephen	Former J&J Sales Representative - See deposition	J&J Defendants
Keast	Shellie	Oklahoma College of Pharmacy - See deposition	State's Counsel
Kolodny	Andrew	See expert disclosure and deposition	State's Counsel
Kuntz	Ronald	J&J Employee - See deposition	J&J Defendants

Kyle	Donald	Purdue employee - See deposition	Purdue Defendants
Larijani	Susan	Teva employee - See deposition	State's Counsel
Lockhart	Angela	Former J&J Sales Representative - See deposition	J&J Defendants
Martin	Sam	See expert disclosure and deposition	State's Counsel
Mashett	Frank	J&J employee - See deposition	J&J Defendants
Mashett	Frank	J&J corporate representative - See deposition	J&J Defendants
Mazloomdoost	Danesh	See expert disclosure and deposition	State's Counsel
McAllister	Bill	See expert disclosure and deposition	State's Counsel
McClure	Melynda	Former J&J Sales Representative - See deposition	J&J Defendants
McGregor	John	See deposition	State's Counsel
Medina	Mark	Former J&J Sales Representative - See deposition	J&J Defendants
Mendell	Gary	See expert disclosure and deposition	State's Counsel
Miller	Lisa	Purdue employee - See deposition	Purdue Defendants
Miller	Matthew	Noramco employee - See deposition	Daniel Jarcho, Alston & Bird LLP
Moskovitz	Bruce	J&J employee - See deposition	J&J Defendants
Mosley	Thomas	Former Teva Sales Representative - See deposition	Teva Defendants
Mullen	Tim	Former Teva Sales Representative - See deposition	Teva Defendants
Must	Alan	Purdue employee - See deposition	Purdue Defendants
Nguyen	Claire	See expert disclosure and deposition	State's Counsel
Panico	Greg	J&J employee	J&J Defendants
Pfeifer	Eric	Chief Medical Examiner - See deposition	State's Counsel
Ponder	Richard	J&J employee	J&J Defendants
Portenoy	Russell	See deposition	S. Amy Spencer, Shaheen Gordon
Radcliffe	Tonya	See deposition	State's Counsel

Robin	Lisa	FSMB - See deposition	Eric Fish, 1300 Connecticut Ave, NW Suite 500, Washington, DC 20036
Robyn	Kohn	Former J&J employee - See deposition	J&J Defendants
Rojas	Julio	See expert disclosure and deposition	State's Counsel
Rosen	Burt	Purdue employee - See deposition	Purdue Defendants
Ruhm	Chris	See expert disclosure and deposition	State's Counsel
Samples	Joanna	J&J Sales Representative	J&J Defendants
Sharp	Susan	See expert disclosure and deposition	State's Counsel
Stewart	Mark	Chief Agent of Enforcement, OBN - See deposition	State's Counsel
Stone	Renzi	See expert disclosure and deposition	State's Counsel
Tate	Travis	Director of Pharmacy, HealthChoice - See deposition	State's Counsel
Thornhill	Eric	Former J&J Sales Representative	J&J Defendants
Tilley	David	Former J&J Sales Representative - See deposition	J&J Defendants
Trindle	Angela	J&J employee	J&J Defendants
VanBurkelo	Kelly	J&J employee	J&J Defendants
Vaughan	Brian	Teva sales representative - See deposition	Teva Defendants
Verheyen	Patrick	J&J employee - See deposition	J&J Defendants
Vorsanger	Gary	J&J employee - See deposition	J&J Defendants
Wakefield	Elizabeth	Former J&J Sales Representative - See deposition	J&J Defendants
Wayman	Eric	Former Purdue Sales Employee - See deposition	Purdue Defendants
White	Terri	See expert disclosure and deposition	State's Counsel
Williams	Paula	Teva employee - See deposition	Teva Defendants
Woodward	Mark	Education Officer and Legislative Liaison, OBN - See deposition	State's Counsel
Corporate Representative(s) of the State of Oklahoma			
Corporate Representative(s) of J&J Defendants			

Corporate Representative(s) of Teva Defendants
--

Any fact or expert witnesses brought to trial by any Defendant
--

Respectfully submitted,

s/ Michael Burrage

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the above and foregoing was emailed on April 26, 2019, to:

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*s/ Michael Burrage* \_\_\_\_\_  
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