



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

AUG 06 2019

IN THE DISTRICT COURT OF CLEVELAND COUNTY  
STATE OF OKLAHOMA

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 JOHNSON & JOHNSON AND JANSSEN PHARMACEUTICALS INC.'S  
RESPONSE TO CBS NEWS'S MOTION FOR LEAVE TO INTERVENE AND  
APPLICATION TO UNSEAL JUDICIAL RECORD**

On July 19, 2019, non-party CBS News filed a motion to intervene in this action “for the limited purpose of seeking an order to unseal . . . certain documents related to the defendants TEVA Pharmaceuticals USA, Inc, (‘TEVA’) and Cephalon Inc. (‘Cephalon’) that have been filed in this case under seal.” Mot. at 1. CBS News specifically requested that the Court unseal “documents pertaining to Cephalon and Teva’s marketing, sales and promotion of opioids, including but not limited to the following motions, exhibits, and all responses and replies thereto:

- Cephalon Motion for Partial Summary, filed February 26, 2019.
- TEVA Motion for Partial Summary Judgment filed March 15, 2019.
- TEVA/Cephalon Motion for Summary Judgment, sealed version filed April 23, 2019, redacted version filed May 2, 2019.
- TEVA/Cephalon Motion for Summary Judgment Exhibit Nos. 19-20, 37-40, 42-46, 49, 52-59, 61-62, and 76, filed under seal on May 2, 2019.
- TEVA/Cephalon Reply to Motion for Summary Judgment, filed May 9, 2019.
- Transcripts of any hearings or arguments on the foregoing summary judgment motions.
- Ex. 70 [TEVA\_OK 00107392-TEVA\_OK 00107461] identified as ‘70-page Actiq 2003 Marketing Plan’ in Teva Pharmaceuticals USA, Inc., Cephalon, Inc., Watson Laboratories, Inc., Actavis LLC, And Actavis Pharma, Inc. F/K/A Watson Pharma, Inc.’s Company Records Stipulation No. 1, filed on June 25, 2019, to the extent that it has been filed in this court (‘Stipulation No. 1’).”

Mot. at 3.

CBS News does not seek to unseal any documents or categories of documents beyond those expressly identified in its Motion. Mot. at 1. Defendants Johnson and Johnson and

Janssen<sup>1</sup> take no position on the Court's unsealing of these specific documents and categories of documents.

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<sup>1</sup> "Janssen" refers to Janssen Pharmaceuticals, Inc., Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc., and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a/ Janssen Pharmaceuticals, Inc.

Respectfully submitted,

By 

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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 August 6, 2019, a true and correct copy of the above and foregoing has been served via electronic mail, to the following:

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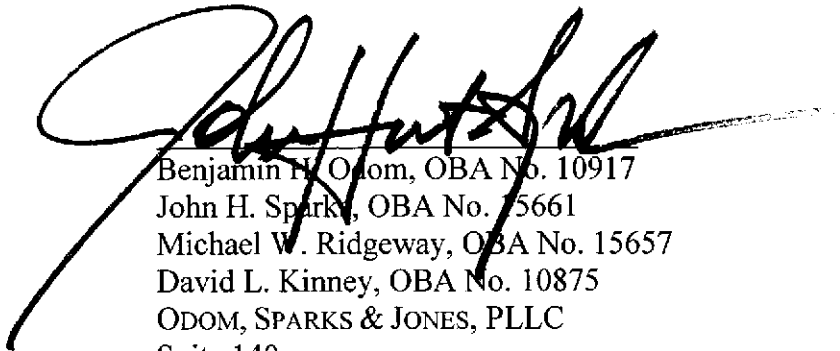
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