



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

**IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA**

AUG 06 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

**PURDUE'S LIMITED RESPONSE TO CBS NEWS' MOTION FOR LEAVE TO
INTERVENE AND APPLICATION TO UNSEAL JUDICIAL RECORDS**

Purdue Pharma L.P., Purdue Pharma Inc., and The Purdue Frederick Company Inc. (collectively "Purdue") respectfully submit this Limited Response to CBS News' Motion for Leave to Intervene and Application to Unseal Judicial Records ("Motion"). By its plain language, the Motion *only* seeks to unseal certain documents of Teva Pharmaceuticals, Inc. ("Teva") and Cephalon Inc. ("Cephalon") that have been filed in the above-captioned action. Mot. at 1 ("Specifically, CBS News seeks access to certain documents related to the defendants TEVA...and Cephalon...that have been filed in this case under seal."). The Motion does not mention Purdue or request any relief with respect to Purdue's documents.

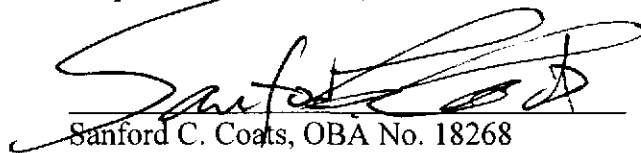
Though this limited scope is stated in the Motion, the Court's previously entered order necessitates clarification of this point. On July 22, 2019, this Court entered an order granting the Motion. This order was filed on July 25, 2019. The Court has now withdrawn this order so as to give Teva and Cephalon an opportunity to respond to this Motion. However, by its terms, this withdrawn order appeared to grant relief that was not sought by CBS News insofar as the order referred to the "parties" providing "a list of documents filed under seal that they wish to keep

under seal.” July 22, 2019 Order at 1. Though CBS News *only* sought the unsealing of Teva and Cephalon documents, this order could be misconstrued as applying to *all* documents.

Purdue does not believe that this was the Court’s intent – including because Purdue is no longer a party – and it respectfully requests that the scope of any order on the Motion be limited to the relief that CBS News actually requested, *i.e.*, the unsealing of the documents of Teva and Cephalon. To the extent that the Court intends to enter relief with respect to other parties’ or non-parties’ documents, those other entities should be properly notified and given a fair opportunity to respond and be heard upon the Motion. *See Guy H. James Constr. Co. v. State ex rel. Okla. Dep’t of Transp.*, 1982 OK 150, 655 P.2d 553, 555 (“at a minimum, due process requires notice and an opportunity for a hearing...”).

Dated: August 6, 2019

Respectfully submitted,



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