



STATE OF OKLAHOMA } S.S.
CLEVELAND COUNTY }

FILED

IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA JUN 10 2019

STATE OF OKLAHOMA, ex rel.,)	
MIKE HUNTER,)	In the office of the
ATTORNEY GENERAL OF OKLAHOMA,)	Court Clerk MARILYN WILLIAMS
)	
Plaintiff,)	
)	
vs.)	Case No. CJ-2017-816
)	The Honorable Thad Balkman
PURDUE PHARMA L.P., et al.,)	
)	Special Master: William Hetherington
Defendants.)	

**PURDUE PHARMA L.P., PURDUE PHARMA, INC. AND THE PURDUE FREDERICK
COMPANY RECORDS STIPULATION NO. 2**

Purdue Pharma, L.P., Purdue Pharma, Inc. and The Purdue Frederick Company (“Purdue”) hereby stipulate and agree that the following facts are true and correct:

1. During the course of the above-styled and numbered cause (“Action”), and in response to one or more discovery requests from Plaintiff to Purdue, Purdue produced to Plaintiff the following documents generally identified as follows:

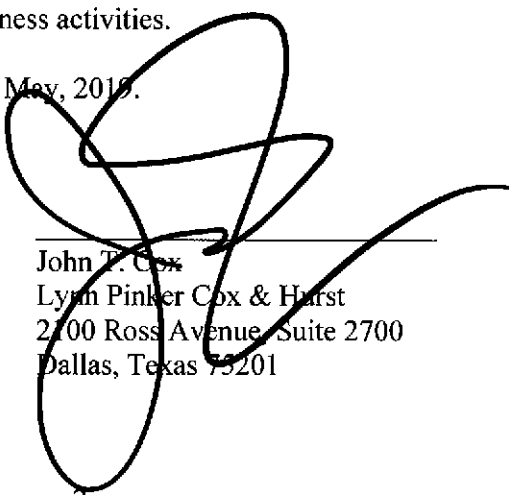
Bates Number(s)	Summary Description
Exhibit A	List of Proposed Target KOLs for PPR Communications
Exhibit B	2-page document containing correspondence from Noramco to E. Miglarese
Exhibit C	14-page document containing a Supply Agreement between PF Laboratories, Inc. and Noramco
Exhibit D	10/13/99 Memo from Friedman to Mortimer, Raymond and Richard Sackler re: Business Quarterly Report
Exhibit E	33-page document entitled Kansas City East Team November 2000 Team Meeting
Exhibit F	Counseling Your Patients and Their Families Regarding the Use of Opioids

2. The documents identified as Exhibit A, Exhibit B, Exhibit C, Exhibit D, Exhibit E and Exhibit F in paragraph 1 are exact duplicates of documents within the possession and control of Purdue that were produced in this Action as identified in paragraph 1.
3. Exhibit A was made at or near the time identified on the document, was made by or from information transmitted by a person having knowledge of those matters, was kept in the course of Purdue's regularly conducted business activities and was made pursuant to Purdue's regularly conducted business activities.
4. Exhibit B was made at or near the time identified on the document, was made by or from information transmitted by a person having knowledge of those matters, was kept in the course of Purdue's regularly conducted business activities and was made pursuant to Purdue's regularly conducted business activities.
5. Exhibit C was made at or near the time identified on the document, was made by or from information transmitted by a person having knowledge of those matters, was kept in the course of Purdue's regularly conducted business activities and was made pursuant to Purdue's regularly conducted business activities.

Exhibit C is confidential, shall remain confidential and, if offered at trial, shall only be offered under seal.

6. Exhibit D was made at or near the time identified on the document, was made by or from information transmitted by a person having knowledge of those matters, was kept in the course of Purdue's regularly conducted business activities and was made pursuant to Purdue's regularly conducted business activities.
7. Exhibit E was made at or near the time identified on the document, was made by or from information transmitted by a person having knowledge of those matters, was kept in the course of Purdue's regularly conducted business activities and was made pursuant to Purdue's regularly conducted business activities.
8. Exhibit F was made at or near the time identified on the document, was made by or from information transmitted by a person having knowledge of those matters, was kept in the course of Purdue's regularly conducted business activities and was made pursuant to Purdue's regularly conducted business activities.

Stipulated and agreed this 29th day of May, 2019.



John T. Cox
Lynn Pinker Cox & Hurst
2700 Ross Avenue, Suite 2700
Dallas, Texas 75201

*Attorneys for Purdue Pharma, LP,
Purdue Pharma, Inc. and The
Purdue Frederick Company*