



STATE OF OKLAHOMA } S.S.
CLEVELAND COUNTY }

FILED

JUN 25 2019

In the office of the
Court Clerk MARILYN WILLIAMS

IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel.,)
MIKE HUNTER,)
ATTORNEY GENERAL OF OKLAHOMA,)
)
Plaintiff,)
)
vs.)
)
PURDUE PHARMA L.P., et al.,)
)
Defendants.)

Case No. CJ-2017-816
The Honorable Thad Balkman
Special Master: William Hetherington

**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**

Teva Pharmaceuticals USA, Inc., Cephalon, Inc., Watson Laboratories, Inc., Actavis LLC,
and Actavis Pharma, Inc. f/k/a Watson Pharma, Inc. ("Teva") 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 Teva, Teva produced to Plaintiff documents bearing the following Bates Number(s) and generally identified as follows:

Exhibit	Bates Number	Comments
1	TEVA_OK_00044404	90-page document containing an email cover page and 89-page powerpoint entitled Directors Meeting ACTIQ, December 2, 2004
2	TEVA_OK_00039264	96-page document with a cover sheet and 95-page powerpoint entitled OVF Commercial Strategy Meeting. (We only need page 10 of this. You agreed to allow us to use this in our opening (which we did))
3	TEVA_OK_11605250	Speaker Utilization Spreadsheet
4	TEVA_OK_05604648 - TEVA_OK_05604661	14-page Teva Speakers Program Spreadsheet
5	TEVA_OK_06289263 - TEVA_OK_06289323	61-page MEP Speaker Honorarium
6	TEVA_OK_11619905 - TEVA_OK_11619908	4-page Speaker Information Document
7	N/A	Written Answers to Corporate Representative Topics 1 & 2 (4 pages)

Exhibit	Bates Number	Comments
8	N/A	Teva list of Schedule II Drugs Developed/Sold (4 pages)
9	N/A	Teva list of Schedule III-V Drugs Developed/Sold (2 pages)
10	N/A	Written Answers to Corporate Representative Topics 34 - list of API supply contracts. (3 pages).
11	TEVA_OK_08964092 - TEVA_OK_08964095	Minutes from ASPI Meeting
12	TEVA_OK_00526696 - TEVA_OK_00526697	Flyer for 20 th Annual Meeting
13	TEVA_OK_00101638 - TEVA_OK_00101707	Pain Advocacy Organizations Index
14	TEVA_OK_07846241	Hydrocodone Rescheduling Advocacy Group Positions
15	TEVA_OK_03889497 - TEVA_OK_03889500	Email from Hlen Yeh re Pubs Ad Board
16	TEVA_OK_03087431	Fentora Team Meeting
17	TEVA_OK_02298350 - TEVA_OK_02298351	Actiq CME Topics
18	TEVA_OK_07746623	Cephalon Live Data 01-04
19	TEVA_OK_1009606	2008 Spreadsheet (Cover page and 7-page spreadsheet)
20	TEVA_OK_06130495 - TEVA_OK_06130503	Actiq MEP 2002 Document (9 pages)
21	TEVA_OK_03300695	Teva HCP Payments
22	TEVA_OK_04687914	Listing of KOLs
23	TEVA_OK_05683525 - TEVA_OK_05683574	Actiq 2004 Dinner CME Lectures
24	TEVA_OK_09266189	Actiq Dinner CME Lectures
25	TEVA_OK_01255457	Honoraria
26	TEVA_OK_00041816	Fentora Commercialization Update (36-page Powerpoint)
27	TEVA_OK_03063698	KOL Development Plan for Cephalon Pain Franchise 2/4/05 (43-page Powerpoint)
28	TEVA_OK_00740562	Fentora Speaker Utilization March 2007 (6-page document)
29	TEVA_OK_00504579 - TEVA_OK_00504581	Proposal for Fentora Medical Scientific Advisory Board (3 pages)
30	TEVA_OK_01992263 - TEVA_OK_01992267	5-page Draft Meeting Minutes for 2011 Fentora Medical/Scientific Advisory Board
31	TEVA_OK_00750059 - TEVA_OK_00750064	2004 Actiq Prescribers (6 pages)
32	TEVA_OK_13254971 - TEVA_OK_13254972	Actiq Approved Speakers

Exhibit	Bates Number	Comments
33	TEVA_OK_09603637 - TEVA OK 09603675	Gerald Aronoff CV
34	TEVA_OK_09523664 - TEVA OK 09523670	Donald Taylor CV
35	TEVA_OK_05238100 - TEVA OK 05238110	Daniel Bennett CV
36	TEVA_OK_03012681 - TEVA OK 03012693	Nat Katz CV
37	TEVA_OK_00594176 - TEVA OK 00594183	June Dahl CV
38	TEVA_OK_00666482 - TEVA OK 00666498	Stevan Litman CV
39	TEVA_OK_11612413	Fentora 2010 Nurses Advisory Board CARE Proposal
40	TEVA OK 00017421	Fentora Program Spreadsheet (25 pages)
41	TEVA_OK_00658985 - TEVA OK 00658987	BTCP Peer Exchange Email
42	TEVA_OK_02530900	KOLs Teva paid, including those that spoke in Oklahoma.
43	TEVA_OK_01850003	Cephalon Payments to Front Groups, KOLs and other companies (9 pages)
44	TEVA OK 02301917	Vendor invoice / payment information (5 pages)
45	TEVA OK 1062582	Cephalon 2005 External Project Costs
46	TEVA OK 01517025	Cephalon 2006 External Project Costs
47	TEVA OK 00537212	Cephalon 2007 External Project Costs
48	TEVA OK 01009606	Cephalon 2008 External Project Costs
49	TEVA OK 04408291	Actiq Chronic Pain IM2
50	TEVA OK 08034057	Teva Activity Report
51	TEVA_OK_05674183 - TEVA OK 05674186	Speaker list.
52	TEVA_OK_03889497 - TEVA OK 03889500	List of attendees at advisory board
53	TEVA_OK_00102280 - TEVA OK 00102282	Teva CNS Pain Care – Fentora – Status Report
54	TEVA_OK_02620993	Email from M. Day re Fentora Advisory Board Meeting
55	TEVA_OK_05980000 - TEVA OK 05980004	Actiq Training Agenda
56	TEVA_OK_05471543 - TEVA OK 05471544	KOL Request
57	TEVA_OK_03105124 - TEVA OK 03105125	Sagedmed-Actiq Consulting Retainer

Exhibit	Bates Number	Comments
58	TEVA_OK_005076707 - TEVA OK 005076714	Marketing Contract Review/Signoff re Bob Twillman
59	TEVA OK 13262888	Exhibit C "Compensation"
60	TEVA_OK_13261926 - TEVA OK 13261934	Speaker Agreement
61	TEVA OK 11616173	Fentora Speaker Bureau Analysis 2011
62	TEVA OK 02514357	Fentora speakers.
63	TEVA OK 03794598	Speaker Information
64	TEVA_OK_07950545	HSGAC Minority Staff Report, "Fueling an Epidemic"
65	TEVA_OK_01483802- TEVA OK 01483843	TRIM Archiong Cover Memo
66	TEVA OK 00039264	"Sales 101: Create Need Sell to Need"
67	TEVA OK 00101708	Pain Advocacy Influencers
68	TEVA_OK_00101615- TEVA OK 00101721	Teva Advocacy Mapping
69	TEVA_OK_00785480- TEVA OK 00785481	Email Chain from A. Pyfer
70	TEVA_OK_00107392- TEVA OK 00107461	70-page Actiq 2003 Marketing Plan

2. The documents identified as Exhibits 1 through 70 are exact duplicates of documents within the possession and control of Teva that were produced in this Action as identified in paragraph 1.
3. Exhibit 1 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 Teva's regularly conducted business activities and was made pursuant to Teva's regularly conducted business activities.
4. Exhibit 2 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 Teva's regularly conducted business activities and was made pursuant to Teva's regularly conducted business activities.
5. Exhibit 3 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 Teva's regularly conducted business activities and was made pursuant to Teva's regularly conducted business activities.
6. Exhibit 4 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

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7. Exhibit 5 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 Teva's regularly conducted business activities and was made pursuant to Teva's regularly conducted business activities.
8. Exhibit 6 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 Teva's regularly conducted business activities and was made pursuant to Teva's regularly conducted business activities.
9. Exhibit 7 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 Teva's regularly conducted business activities and was made pursuant to Teva's regularly conducted business activities.
10. Exhibit 8 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 Teva's regularly conducted business activities and was made pursuant to Teva's regularly conducted business activities.
11. Exhibit 9 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 Teva's regularly conducted business activities and was made pursuant to Teva's regularly conducted business activities.
12. Exhibit 10 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 Teva's regularly conducted business activities and was made pursuant to Teva's regularly conducted business activities.
13. Exhibit 11 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 Teva's regularly conducted business activities and was made pursuant to Teva's regularly conducted business activities.
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Exhibit 30 is confidential, shall remain confidential and, if offered at trial, shall only be offered under seal.

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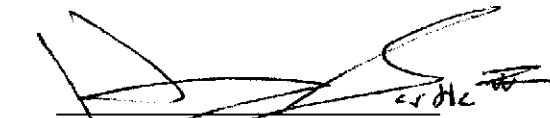
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72. Exhibit 70 was made at or near the time identified on the document, was made by or from information transmitted by a person having knowledge of those matters, was kept in the course of Teva's regularly conducted business activities and was made pursuant to Teva's regularly conducted business activities.

Exhibit 70 is confidential, shall remain confidential and, if offered at trial, shall only be offered under seal.

Stipulated and agreed this 25 th day of June 2019.



Harvey Bartle IV
MORGAN, LEWIS & BOCKIUS
1701 Market St.
Philadelphia, PA 19103-2921

*Attorney for Teva Pharmaceuticals
USA, Inc., Cephalon, Inc., Watson
Laboratories, Inc., Actavis LLC,
and Actavis Pharma, Inc. f/k/a
Watson Pharma, Inc.*