



IN THE DISTRICT COURT OF CLEVELAND COUNTY  
STATE OF OKLAHOMA

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

vs. )

(1) PURDUE PHARMA L.P.; )  
(2) PURDUE PHARMA, INC.; )  
(3) THE PURDUE FREDERICK COMPANY; )  
(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. )

Case No. CJ-2017-816

Judge Thad Balkman

STATE OF OKLAHOMA } S.S.  
CLEVELAND COUNTY }

FILED

JUN 14 2019

In the office of the  
Court Clerk MARILYN WILLIAMS

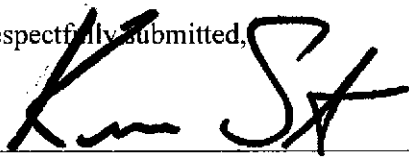
**APPLICATION FOR LEAVE TO FILE AMICUS BRIEF OR IN THE ALTERNATIVE MOTION  
FOR INTERVENTION AS A MATTER OF RIGHT PURSUANT TO  
12 O.S. 2011, SECTION 2024**

COME NOW, the Honorable J. Kevin Stitt, in his official capacity as Governor of the State of Oklahoma, Charles A. McCall, in his official capacity as Speaker of the Oklahoma House of Representatives, and Greg Treat, in his official capacity as the President Pro Tempore of the Oklahoma State Senate (“Applicants”), all in their capacity as elected officials representing the people of the State of Oklahoma on whose behalf the Attorney General filed the above entitled suit and request (i) permission of the Court to consider this amicus brief in the above styled cause, or in the alternative (ii) an Order allowing intervention as a matter of right pursuant 12 O.S. 2011, Section 2024.

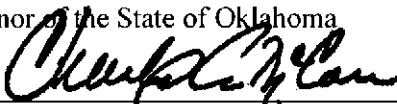
Applicants are aware of a pending settlement agreement as between the State of Oklahoma and Teva Pharmaceuticals USA, Inc. and its subsidiaries and affiliates (the “Teva Defendants”). Applicants file this Brief to address questions raised by this Court regarding the payment of monies by the Teva Defendants as part of its settlement with the State of Oklahoma.

Wherefore, Applicants respectfully request that this Court grant leave to file an Amicus Brief for the limited purpose of addressing the one issue raised by this Court regarding the applicability of the law with regard to settlement proceeds or in the alternative grant the Applicants alternatively styled Motion to Intervene for the same limited purpose.

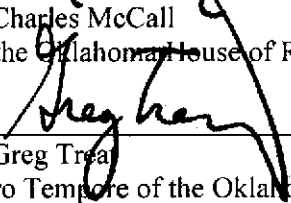
Respectfully submitted,



\_\_\_\_\_  
Honorable Kevin Stitt  
Governor of the State of Oklahoma



\_\_\_\_\_  
Honorable Charles McCall  
Speaker of the Oklahoma House of Representatives



\_\_\_\_\_  
Honorable Greg Treat  
President Pro Tempore of the Oklahoma State Senate

## CERTIFICATE OF SERVICE

Mike Hunter, OBA No. 4503,  
Abby Dillsaver, OBA No. 20675  
Ethan A. Shaner, OBA No. 30916  
OKLAHOMA OFFICE OF THE  
ATTORNEY GENERAL  
313 NE 21<sup>st</sup> St  
Oklahoma City, OK 73105  
Telephone: (405) 521-3921  
Facsimile: (405) 521-6246  
[abby.dillsaver@oag.ok.gov](mailto:abby.dillsaver@oag.ok.gov)  
[ethan.shaner@oag.ok.gov](mailto:ethan.shaner@oag.ok.gov)

Michael Burrage, OBA No. 1350  
Reggie Whitten, OBA No. 9576  
WHITTEN BURRAGE  
512 N. Broadway Avenue, Suite 300  
Oklahoma City, OK 73102  
Telephone: (405) 516-7800  
Facsimile: (405) 516-7859  
[mburrage@whittenburrage.com](mailto:mburrage@whittenburrage.com)  
[rwhitten@whittenburrage.com](mailto:rwhitten@whittenburrage.com)

Bradley E. Beckworth, OBA No. 19982  
Jeffrey J. Angelovich, OBA No. 19981  
Lisa P. Baldwin, OBA No. 32947  
Drew Pate, *pro hac vice*  
Trey Duck, OBA No. 33347  
NIX PATTERSON, LLP  
512 N. Broadway Avenue, Suite 200  
Oklahoma City, OK 73102  
Telephone: (405) 516-7800  
Facsimile: (405) 516-7859  
Emails: [bbeckworth@nixlaw.com](mailto:bbeckworth@nixlaw.com)  
[jangelovich@nixlaw.com](mailto:jangelovich@nixlaw.com)  
[lbaldwin@nixlaw.com](mailto:lbaldwin@nixlaw.com)  
[dpate@nixlaw.com](mailto:dpate@nixlaw.com)  
[tduck@nixlaw.com](mailto:tduck@nixlaw.com)

Glenn Coffee, OBA No. 14563  
GLENN COFFEE & ASSOCIATES, PLLC  
915 N. Robison Ave.  
Oklahoma City, OK 73102  
Telephone: (405) 601-1616  
Email: [gcoffee@glenncoffee.com](mailto:gcoffee@glenncoffee.com)

Harvey Bartle IV, *pro hac vice*  
Eric W. Sitarchuk, *pro hac vice*  
Nancy L. Patterson, *pro hac vice*  
MORGAN LEWIS & BOCKIUS, LLP  
1701 Market St.  
Philadelphia, PA 19103-2921  
Telephone: (215) 963-5000  
Email: [harvey.bartle@morganlewis.com](mailto:harvey.bartle@morganlewis.com)  
*Counsel for Teva Ltd., Teva Pharmaceuticals  
USA, Inc., Cephalon, Inc., Watson Laboratories,  
Inc., Actavis LLC, Actavis Pharm, Inc., f/k/a  
Watson Pharma, Inc.*

Robert G. McCampbell, OBA No. 10390  
Nicholas ("Nick") V. Merkley, OBA No. 20284  
GABLEGOTWALS  
One Leadership Square, 15<sup>th</sup> Fl.  
211 North Robinson  
Oklahoma City, OK 73102-7255  
Telephone: (405) 235-5500  
Emails: [rmccampbell@gablelaw.com](mailto:rmccampbell@gablelaw.com)  
[nmerkley@gablelaw.com](mailto:nmerkley@gablelaw.com)  
*Counsel for Teva Ltd., Teva Pharmaceuticals  
USA, Inc., Cephalon, Inc., Watson Laboratories,  
Inc., Actavis LLC, Actavis Pharm, Inc., f/k/a  
Watson Pharma, Inc.*