



IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA, *ex rel.* Mike Hunter,
Attorney General, } s.s.
STATE OF OKLAHOMA }
CLEVELAND COUNTY }

Plaintiff,

FILED
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Case No. CJ-2017-816
Honorable Thad Balkman

v.

PURDUE PHARMA L.P. *et al.*,

In the office of the
Court Clerk MARILYN WILLIAMS

William C. Hetherington
Special Discovery Master

Defendants.

**TEVA DEFENDANTS' ADOPTION OF PURDUE'S RESPONSE TO DR. REGAN
NICHOLS'S MOTION FOR THRID-PARTY EXCEPTION TO PROTECTIVE ORDER**

Pursuant to Okla. Stat. tit. 12, § 2010(C), the Teva Defendants hereby adopt and incorporate the Response to Dr. Regan Nichols's Motion for Third-Party Exception to Protective Order filed by Purdue on October 7, 2019. The Teva Defendants accept Judge Mai's order in the criminal proceeding allowing Dr. Nichols access to the documents currently within the State's possession¹ subject to this Court's Amended Protective Order dated April 16, 2018, but oppose her request that her access be unlimited and not subject to the protective order.

Respectfully submitted,

Robert G. McCampbell, OBA No. 10390
Nicholas ("Nick") V. Merkley, OBA No. 20284
Leasa M. Stewart, OBA No. 18515
Jeffrey A. Curran, OBA No. 12255
Kyle D. Evans, OBA No. 22135
Ashley E. Quinn, OBA No. 33251

¹ The State should not have possession of many documents produced by the Teva Defendants. The Amended Protective Order, Consent Judgment and the settlement documents between the State and the Teva Defendants required the State to destroy all documents within its possession, subject to exceptions for documents offered into evidence or filed without restriction as to disclosure. See Amended Protective Order, p. 20, ¶ 19(b).

GABLEGOTWALS

One Leadership Square, 15th Fl.

211 North Robinson

Oklahoma City, OK 73102-7255

T: +1.405.235.3314

E-mail: RMcCampbell@Gablelaw.com

E-mail: NMerkley@Gablelaw.com

E-mail: LStewart@gablelaw.com

E-mail: JCurran@Gablelaw.com

E-mail: KEvans@gablelaw.com

E-mail: AQuinn@Gablelaw.com

OF COUNSEL:

Steven A. Reed

Harvey Bartle IV

Mark A. Fiore

Rebecca Hillyer

Evan K. Jacobs

MORGAN, LEWIS & BOCKIUS LLP

1701 Market Street

Philadelphia, PA 19103-2921

T: +1.215.963.5000

E-mail: steven.reed@morganlewis.com

E-mail: harvey.bartle@morganlewis.com

E-mail: mark.fiore@morganlewis.com

E-mail: rebecca.hillyer@morganlewis.com

E-mail : evan.jacobs@morganlewis.com

Nancy L. Patterson

MORGAN, LEWIS & BOCKIUS LLP

1000 Louisiana St., Suite 4000

Houston, TX 77002-5006

T: +1.713.890.5195

E-mail: nancy.patterson@morganlewis.com

Brian M. Ercole

Melissa M. Coates

Martha A. Leibell

MORGAN, LEWIS & BOCKIUS LLP

200 S. Biscayne Blvd., Suite 5300

Miami, FL 33131

T: +1.305.415.3000

E-mail: brian.ercole@morganlewis.com

E-mail: melissa.coates@morganlewis.com

E-mail: martha.leibell@morganlewis.com

Collie T. James, IV
MORGAN, LEWIS & BOCKIUS LLP
600 Anton, Blvd., Suite 1800
Costa Mesa, CA 92626
T: +1.714.830.0600
E-mail: collie.james@morganlewis.com

Tinos Diamantatos
MORGAN, LEWIS & BOCKIUS LLP
77 W. Wacker Dr.
Chicago, IL 60601
T: +1.312.324.1000
E-mail: tinios.diamantatos@morganlewis.com

Steven A. Luxton
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Ave., NW
Washington, DC 20004
T: +1.202.739.3000
E-mail: steven.luxton@morganlewis.com

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

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was hand delivered this 8th day of October, 2019, to the following:

***Attorneys for
Plaintiff***

Mike Hunter, Attorney General
Abby Dillsaver, General Counsel
Ethan Shaner, Dep. Gen. Counsel
ATTORNEY GENERAL'S OFFICE
313 N.E. 21st Street
Oklahoma City, OK 73105

Bradley Beckworth
Jeffrey Angelovich
Lloyd Nolan Duck, III
Andrew G. Pate
Lisa Baldwin
Brooke A. Churchman
Nathan B. Hall
NIX, PATTERSON & ROACH
512 N. Broadway Ave., Ste. 200
Oklahoma City, OK 73102

Glenn Coffee
GLENN COFFEE & ASSOCIATES, PLLC
915 N. Robinson Ave.
Oklahoma City, OK 73102

Michael Burrage
Reggie Whitten
J. Revell Parrish
WHITTEN BURRAGE
512 N. Broadway Ave., Ste. 300
Oklahoma City, OK 73102

Robert Winn Cutler
Ross E Leonoudakis
NIX PATTERSON & ROACH
3600 N. Capital of Texas Hwy.
Suite B350
Austin, TX 78746

*Attorneys for
Johnson & Johnson,
Janssen
Pharmaceutica, Inc.,
N/K/A Janssen
Pharmaceutics,
Inc., and Ortho-
McNeil-Janssen
Pharmaceutics,
Inc. N/K/A Janssen
Pharmaceutics,
Inc.*

John H. Sparks
Benjamin H. Odom
Michael W. Ridgeway
David L. Kinney
ODOM SPARKS & JONES
2500 McGee Drive, Suite 140
Norman, OK 73072

Charles C. Lifland
Jennifer D. Cardelus
Wallace M. Allan
Sabrina H. Strong
Houman Ehsan
Esteban Rodriguez
Justine M. Daniels
O'MELVENY & MEYERS
400 S. Hope Street, 18th Floor
Los Angeles, CA 90071

Stephen D. Brody
David Roberts
Emilie K. Winckel
O'MELVENY & MEYERS
1625 Eye Street NW
Washington, DC 20006

Daniel J. Franklin
Ross B Galin
Desirae Krislie Cubero Tongco
Vincent S. Weisband
O'MELVENY & MEYERS
7 Times Square
New York, NY 10036

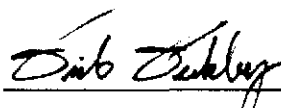
Amy R. Lucas
O'MELVENY & MEYERS
1999 Ave. of the Stars, 8th Fl.
Los Angeles, CA 90067

Jeffrey A. Barker
Amy J. Laurendeau
Michael Yoder
O'MELVENY & MEYERS
610 Newport Center Drive
Newport Beach, CA 92660

Larry D. Ottaway
Amy Sherry Fischer
Andrew Bowman
Steven J. Johnson
Kaitlyn Dunn
Jordyn L. Cartmell
FOLIART, HUFF, OTTAWAY & BOTTOM
201 Robert S. Kerr Ave., 12th Fl.
Oklahoma City, OK 73102

Attorneys for Purdue Pharma, LP, Purdue Pharma, Inc. and The Purdue Frederick Company	Sheila L. Birnbaum	Erik W. Snapp
	Mark S. Cheffo	DECHERT, LLP
	Hayden Adam Coleman	35 W. Wacker Drive, Ste. 3400
	Paul LaFata	Chicago, IL 60601
	Jonathan S. Tam	
	Lindsay N. Zanello	Meghan R. Kelly
	Bert L. Wolff	Benjamin F. McAnaney
	Mara C. Cusker Gonzalez	Hope S. Freiwald
	DECHERT, LLP	Will W. Sachse
	Three Bryant Park	DECHERT, LLP
1095 Avenue of the Americas	2929 Arch Street	
New York, NY 10036	Philadelphia, PA 19104	
William W. Oxley	Jonathan S. Tam	
DECHERT LLP	Jae Hong Lee	
U.S. Bank Tower	DECHERT, LLP	
633 West 5th Street, Suite 4900	One Bush Street, 16th Floor	
Los Angeles, CA 90071	San Francisco, CA 94104	
Britta E. Stanton	Robert S. Hoff	
John D. Volney	WIGGIN & DANA, LLP	
John T. Cox, III	265 Church Street	
Eric W. Pinker	New Haven, CT 06510	
Jared D. Eisenberg		
Jervonne D. Newsome	Sanford C. Coats	
Ruben A. Garcia	Joshua Burns	
Russell Guy Herman	CROWE & DUNLEVY	
Samuel Butler Hardy, IV	324 N. Robinson Ave., Ste. 100	
Alan Dabdoub	Oklahoma City, OK 73102	
David S. Coale		
LYNN PINKER COX & HURST		
2100 Ross Avenue, Suite 2700		
Dallas, TX 75201		

Attorney for Dr. Regan Nichols	Tommy Adler
	ATKINS & MARKOFF
	9211 Lake Hefner Parkway
	Suite 104
	Oklahoma City, OK 73120



 Nicholas V. Merkley