

**Single-Document Comparison:
Mallinckrodt Proposed Document Search Terms (October 8, 2018)**

Legend

Red text	The red text reflects the terms for which Mallinckrodt's as-applied search term set proposes to modify the terms set forth in the current search term demand from Keller Rohrback. Please note that the document incorporates your two rulings regarding search terms provided on 10/7/18 – that is, all "w/100" need to be changed to "w/50", including the one before the numbered search strings, and all "AND" connectors need to be changed to "w/50". All terms in black text are found in both sides' search term sets.
Grey and beige shading	On July 24, Keller Rohrback provided its search term demand with certain terms highlighted as "high priority." For additional context, the search strings herein shaded in beige correspond to those that were previously indicated by Keller Rohrback as high priority terms. The search strings herein shaded in grey correspond to those that were previously indicated by Keller Rohrback as not high priority terms.

(SAO or “short acting opioid” or LAO or “long acting opioid” or ROO or “rapid onset opioid” or “ER-LA” or “ER/LA” or “extended release, long acting” or (Oxy* w/5 30) or *Conti or Dilaud* or Delaud* or Butran* or Hysing* or Hising* or Targin* or (morphine w/2 sulfate) or *morphine or eodeine or hydromorphone* or bupren* or *oxycodone or Kadian or Kadean or Norco or Actiq or Fentora or fentanyl* or fentin* or durages* or Nucynta or nucinta or nusynta or Nucynta or tapent* or opana* or perco* or perca* or subsys or subsis or exalgo* or roxicodone* or roxeeo* or Xartemis* or Xartim* or methadose or methadone or naltrex* or opoid* or opioid* or opiate* or magnacet or oxymorphone)



w/50100¹ of any of the search queries below:

No.	Search String
1.	jama OR nejm or “journal of the american medical association” or “new england journal of medicine”
2.	Krebs or Kolodny or Lembke or Dreamland
3.	Gravelly OR (Jane w/2 Porter) OR (Hershel w/2 Jick)
4.	(neonatal OR infant* OR newborn* OR bab*) w/3 (withdrawal)
5.	/AND “black market” or illegal or street or dealer or stolen or theft or “false prescription” or “fake prescription”
6.	((“Center* for Disease Control” OR “CDC”) w/10 guideline) or epidemic OR crisis OR catastrophe OR “public safety” OR “public health” or advisory or HIV or aids
7.	death* OR dying OR dead OR dies OR mortalit* OR fatal* OR toxic* OR coma or kill* OR (life w/3 threat*) or overdos* or OD
8.	/AND w/100 addict* OR hook* OR junk* OR dep* OR abus* OR kick* OR habit* OR overus* OR deter* “ADF” or “ADT”
9.	“ER visit*” OR hospital* OR rehab* OR detox OR intervention* OR emergency OR clinic
10.	recreational OR illicit OR illegal OR heroin OR herin OR herion or opium
11.	NDS or “Pharmaceutical Data Services” OR PDS or “PRA Health” or SDI or “Source Healthcare” or “Wolters Kluwer”
12.	Bllshit or bullshit or “bull shit” or corrupt or “cover up” or crap* or cya or dammit or damn or “deep shit” or “f—k” or “f ed” or “f uck” or fcuk or “fu k” or fu*k or fuck* or garbage or “gray



¹ Except where otherwise noted.

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	area" or "grey area" or "hit the fan" or "red flag" or s—t or s-hit or "sh t" or shit* or "time bomb" or toxic or "wtf" or (whiskey w/2 tango w/2 foxtrot) or OMG or "O.M.G."
13.	((DOJ or justice or DEA or Florida) w/5 settlement) or ((Hobart w/25 (diver* or fail* or violat* or audit* or secure or security or DEA or investing*))
14.	"South Florida Pain" or George w/in 2 of (Jeff* OR Chris*) or "American Pain" or "Executive Pain" or "Hallandale Pain" or "East Coast Pain"
15.	"C.A.R.E.S" or (CARES w/2 Alliance) or "Collaborating and Acting Responsibly to Ensure Safety" or (Charles w/2 Argoff) or (Bradley w/2 Galer) or "Defeat Chronic Pain Now" or (Defeat w/2 Chronic)
16.	"adverse event*" or "adv event" or AERS or FAERS OR PV OR Pharmacovig*
17.	Arclight or IMS or IQVIA or Quintiles* or Scriptline* or Verispan* or Medscape
18.	"blue highway" or "oxy express" or migrat*
19.	/AND w/100 chew* OR inject* OR insufflat* OR snort OR grind OR ground OR illicit OR cook* OR dissolv* OR crush* OR break* OR inhal* OR heat* OR soak* OR manipul* OR shoot* OR intraven* OR "IV" OR "route of administration" or tamper*
20.	w/50 interstate
21.	bonus* OR compensat* OR lie* OR lying OR Liar* OR jail OR (lock* w/2 up) OR prison
22.	w/25 convict* OR liabilit* OR liabl* OR sue* OR violat* OR kill* OR wrong* OR victim* OR idiot* OR fine* OR punish* OR penal* OR license* OR DOJ OR plea* OR judgment* OR feds OR "attorney* general*" OR subpoena
23.	Whistle*blower or "whistle blower" OR hid* OR hiding* OR secret OR "cover up" OR conceal* OR scam* OR "witch hunt" OR crime* OR criminal* OR uncomfortabl* OR fault OR misgiving* OR worrie* OR worry OR trouble* OR problem*
24.	Hyperalgesia
25.	"market share" OR marketshare OR (share w/5 market) OR (leader w/5 market)
26.	"return on investment" OR ROI OR budget* OR "business plan" OR strateg* OR meeting* OR minutes* OR agenda* OR payor* OR project* OR (growth w/5 plan) OR snapshot* OR report*



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27.	chargeback* OR (<u>volume w/10 (discount* OR rebate*)</u>) OR assistance OR coupon
28.	"Law Enforcement Executive Development" OR (FBI w/2 LEEDA)
29.	Mitigation OR REMS OR "Risk MAP" or RiskMap or "patient guidelines" or informed or consent or IRB or "investigator brochure"
30.	"dear doctor" OR "dear health*" or "Dear HCP" or PIR or "information response"
31.	<u>("prescription* monitor* program*" OR PMP OR PDMP) w/25 Ohio</u>
32.	(citizen w/5 petition*)
33.	complain* OR (incident w/5 report*)
34.	DDMAC OR OPDP or minutes or "FDA contact" or "Type B" or "Type C" or "contact record" or "warning letter" or "untitled letter" or "incomplete response" or "complete response" OR label OR "black box"
35.	<u>((DEA or "Drug Enforcement Administration") w/10 (report* OR notif* OR submit*)) w/25 Ohio</u> OR Nares
36.	doctor w/5 shop*
37.	effective w/2 control*
38.	PhRMA w/5 Code
39.	warning w/2 letter*
40.	congress* or lobby* or senat*
41.	investigat*
42.	"controlled substances act" OR csa OR "1301"
43.	Grassley OR Baucus OR Hatch OR Wyden OR McCaskill



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No.	Search String
44.	/AND-((suspicious w/10 prescrib*) OR (suspicious w/3 order)) w/25 OhioOR-SOM
45.	w/10 relief OR pain OR use OR function
46.	w/10 "daily"
47.	w/50 effect* OR efficac* or w/10 ("improved function" OR (level w/5 function))
48.	"around the clock" OR {(24 w/2 hour) OR ("twenty four hour" OR "twenty-four hour" OR "twenty four" w/2 hour OR "twenty-four" w/2 four w/2 hour)}
49.	"field sales team" OR "sales rep*" OR pamphlet* OR brochure* OR "sales sheet*" OR video OR journal* OR reprint* OR article* OR publication* OR manual*
50.	"fifth vital" OR "5th vital"
51.	"promotional review committee" OR PRC OR "legal review" OR "medical legal"
52.	nonopioid* OR nonopiate* OR (non w/2 (opioid* OR opiate*))
53.	w/50 *arthriti* OR rheumat* OR anykylosing OR spondylit* OR spondyloarthri* or fibromyalgia or headache
54.	w/50 elderly OR geriatric* OR seniors OR "senior citizens"
55.	{exaggerate* w/5 (fear* OR scar* OR terr*)}
56.	w/50 (inflam* OR "diabetic" OR DM OR DPN OR disc* OR "back pain")
57.	(key w/5 message*) OR (action w/5 plan*)}
58.	w/25 (marketing OR adverti* OR unbrand* OR brand* OR present* OR conference* OR exhibition* OR (video w/2 conferenc*) OR videoconferenc* OR poster* OR "trade show*" OR "visual aid*" OR handout* OR "hand-out*" OR flyer* OR factsheet* OR "fact sheet*" OR "visual aid* OR "leave behind" OR one sheet*)
59.	(med* w/2 (necessary OR unnecessary))
60.	{mild w/5 pain}

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61.	mislead* OR deceive* OR misled OR misrep* OR deceiv* OR decept* OR omit* OR omission* OR fraud*
62.	"nonsteroidal* antiinflammatory" OR "NSAID*" OR Tylenol OR Advil OR Aleve OR acetaminophen OR ibuprofen OR aspirin OR naproxen
63.	{overprescrib* OR overdos* OR (doctor* w/5 shop*) OR alias* OR (drug* w/5 seek*) OR (multi* w/5 prescri*) OR (multi* w/5 physician*) OR (refill* w/5 histor*) OR crime* OR criminal* OR illicit}
64.	(prescribe* w/5 guide*)
65.	(quality w/2 life)
66.	{sciatic* OR (nerve* w/5 pain*) OR radiculo* OR (nerve* w/5 (imping* OR press*))}
67.	(script* w/10 (market* OR sale* OR rep*))
68.	Marketing w/25 (study OR studies OR trial* OR experiment* OR analys* OR research* OR investigat* OR conduct* OR author* OR scientific OR empirical OR statistic* OR observational OR cohort OR epi*)
69.	{suspect* OR fake* OR faking OR stole* OR steal* OR scam* OR "street value" OR (drug* w/5 deal*)}
70.	{toleran* OR withdrawal* }
71.	"call note"
72.	w/50 ceiling
73.	Chronic <u>w/30 ("non-cancer pain" OR "non cancer pain")</u>
74.	danger*
75.	dependen*
76.	euphori*
77.	myth*
78.	Painkiller* or pain-killer* or "pain killer" or "pain med" or "pain manag*" or "pain pill"

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79.	pr dispose*
80.	r isk*
81.	s afe*
82.	s tigma*
83.	withdrawal
84.	Chronic w/30 ("non-cancer <u>pain</u>" OR "non cancer <u>pain</u>")-or noncancer
85.	{(use* OR using OR usage) w/510 ("long term" OR "short term" OR extend* OR "steady state")
86.	legitimate w/10 (pain OR patient* OR medical OR use* OR treatment* OR scien*)
87.	opioid* w/5 screen*
88.	pain* w/50100 ("off label" OR offlabel OR "prior auth*" OR reimburs*" OR disput* OR reject* OR "step therapy" OR indicat* OR first*line-OR (not w/5 support*))
89.	pseudoaddict* OR (pseudo w/2 addict*) OR "pseudo-addict* OR toler* or depend*"
90.	undertreat* w/10 pain
91.	Marketing w/5 "focus group"
92.	{"off label" OR offlabel OR "prior auth*" OR reimburs* OR dispute* OR reject* OR "step therapy" OR "first*line"}
93.	{(core OR high) w/2 prescriber*}
94.	"_Target_* w/10 (list_ or panel or vet* or PCP OR PCPs OR rheumatol* OR neurol* OR nurse* OR RN OR "primary care" OR "pain doctor*" OR "pain specialist*" OR anesthes*)
95.	{provider* OR prescriber* OR doctor* OR physician* OR nurse* OR MD*} w/10 (decid* OR choos* OR chos* OR select* OR determin* OR favor* OR prefer*)
96.	w/50 (survey OR attitude* OR opinion* OR perception* OR perceive*)
97.	w/10 (detail* or market* or promot*) w/25 Ohio

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98.	w/10 ((whale OR target* or "high volume") or "high-prescrib*" OR (high w/3 prescriber)w/25 Ohio)
99.	"pill-w/2 mill*" w/25 Ohio
100.	emergingsolutionsinpain*
101.	inthefaceofpain*
102.	letstalkpain*
103.	painedu*
104.	painknowledge*
105.	partnersagainstpain*
106.	prescriberesponsibly*
107.	smartmovesmartchoices*
108.	((("867" OR "852" OR "850" OR wholesale* OR inventory* OR sale*downstream) w/520 (data* OR "EDI" OR report* OR trac* OR detail* OR scorecard* OR base*)) w/25 Ohio
109.	"chargeback" OR "Charge back" OR "charge-back"
110.	{Distribut* OR trad*} w/20 {chain* OR network* OR partner* OR system* OR partner*}
111.	(Sale* OR volume OR rebate*) w/120 (promotion OR agree* OR program* OR incentive* OR allowance* OR adjustment* OR discount* or rebate)
112.	manufacturer w/5 *marketing*
113.	((suspicious OR above OR average OR unusual OR irregular OR atypical OR abnormal OR aberrant OR anomalous OR devia* OR notable OR disproportion*) w/50 (order* OR movement* OR volume* OR siz* OR frequen* OR sale* OR demand OR request* OR purchase* OR buy* OR flag* OR alert* OR release* OR pattern* OR trend* OR activit* OR forecast* OR detect* OR exception*)) w/25 Ohio
114.	"OI" or (Order w/5 interest)
115.	"CSMP" OR "SOM" OR ((monitor* OR identif* OR detect* OR discover* OR track*) w/20 (program* OR system* protocol* OR procedure*))

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116.	(assign* OR monitor* OR allocat* OR impos* OR confer* OR task* OR diligence OR flag* OR review* OR document* OR existing OR customer*) w/ <u>120</u> (threshold* OR baseline* OR forecast*)
117.	diversion OR Hobart w/25 diver*
118.	"KYC" OR "know your customer" OR (diligence w/5 customer)
119.	Cardinal* OR Amerisource* OR McKesson* OR "HD-Smith*" OR "H.D. Smith*" OR "Discount Drug*" OR "Prescription supply*" OR CVS OR "HBC" OR "Rite Aid*" OR "Walgreen*" OR "Walmart" OR "Wal-mart"
120.	Valuecentric* OR Valuetrak*
121.	(individual OR appl* OR manufact*) w/5 Quota or "APQ"
122.	"prescriber-identifiable data" OR (prescriber w/5 data)
123.	net w/5 disposal
124.	utilization w/5 report
125.	(asses* or establish* or medical or scientific or research or industrial) w/10 (need)
126.	trend* w/5 "net disposal"
127.	"projected demand"
128.	("govt affairs" or "government aff*")
129.	Narcan OR Naloxone OR Amitiza OR lubiprostone OR naloxegol OR movantik OR methylnaltrexone OR relistor OR naldemedine OR symproic
130.	w/50 (release OR onset OR duration)
131.	opiophobia* OR downstream OR threshold
132.	Oxycotton or OC or O.C. or M30 or "M 30" or "M/30" or "Ms" or "M's" or Blues or Roxies or Mallies



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Marketing Search Terms

1.	w/50 "continuing medical education" OR "medical education" OR CME* OR fund* OR grant* OR sponsor* OR collab* OR research* OR "investigator initiated" OR IIR)
2.	w/50 ((patient* w/5 advoca*) OR (peer* w/5 program*) OR (speaker* OR w/5 bureau)* OR advisor* OR symposi*)
3.	("key opinion leader*" OR kol* OR "thought leader*" OR OR (peer* w/5 program*) OR train*)
4.	<u>Marketing w/5</u> (sponsorship* OR "business plan" OR campaign* OR dinner* OR lunch* OR honorari* OR incent* OR gift* OR bonus* OR graft* OR brib*)
5.	Fanciullo OR ((Scott OR Dr.) w/3 Fishman) OR Haddox OR Pergolizzi OR Portenoy OR Saper OR ((Lynn OR Dr.) w/3 Webster) or Nalamachu or Yapundich or Schim or Hoffberg or Dore or ((Perry OR Dr.) w/3 Fine)
6.	"Academy of Integrative Pain Management" OR AIPM
7.	"Alcohol Drug Abuse Directors" OR NASADAD
8.	"Alliance for Patient Access" OR APA
9.	"American Academy of Pain Medicine" OR AAPM
10.	"American Chronic Pain Association" OR ACPA
11.	"American Geriatric* Society" OR AGS
12.	"American Osteopathic Association"
13.	"American Pain Foundation" OR APF
14.	"American Pain Society" OR APS
15.	"American Society for Pain Management Nursing" OR ASPMN
16.	"American Society of Addiction Medicine" OR ASAM OR ILSAM
17.	"Anti-Drug Coalition" OR CADCA
18.	"board of pharmacy" OR "boards of pharmacy"
19.	"College on Problems of Drug Dependence" OR "CPDD"
20.	"Federation of State Medical Boards" OR "FSMB"
21.	"Healthcare Distribution Alliance" OR "HDA"

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22.	"Healthcare Distribution Management Association" OR "HDMA"
23.	"Joint Commission" OR JCAHO OR JHACO
24.	"National Association of Drug Diversion Investigators" OR NADDI
25.	"National Initiative on Pain Control" OR NIPC
26.	"National Pain Foundation" OR NPF
27.	"Pain and Policy Studies Group" OR PPSG
28.	"Pain Care Forum" OR PCF
29.	"Society of Interventional Pain" OR ASIPP
30.	"U.S. Pain Foundation" OR "US Pain Foundation" OR USPF
31.	"Will Rowe"
32.	"Woodberry Associates"
33.	"front group"
34.	*Panchal*
35.	"American Association for the Treatment of Opioid Dependence" OR AATOD
36.	"Physicians for Responsible Opioid Prescribing" OR PROP
37.	{media OR magazine OR spread or press}

