

# EXHIBIT 2



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"I will stand for my client's rights.  
I am a trial lawyer."  
-Ron Motley (1944-2013)

**CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER**

July 16, 2018

**VIA ELECTRONIC MAIL**

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RE: *In Re National Prescription Opioid Litigation*; Case No. 17-md-2804  
*The County of Summit, Ohio, et al. v. Purdue Pharma L.P., et al.*; Case No. 1-18-op-45090  
CMO No. 1 ¶ 9(I)(iii)

Counsel:

We are writing on behalf of the County of Summit and the City of Akron, Ohio pursuant to CMO No. 1 ¶ 9(I)(iii). CMO No. 1 ¶ 9(I)(iii) provides,

**No later than, Monday, July 16, 2018**, each Plaintiff in cases in Track One that alleges money damages based upon unnecessary prescriptions shall identify: (a) the



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prescriptions that each Plaintiff asserts were medically unnecessary or medically inappropriate, to whom they were written, and whether Plaintiff reimbursed for them; (b) the physicians or healthcare providers who wrote the prescriptions; and (c) Plaintiff's basis for identifying the prescriptions that it asserts are medically unnecessary or medically inappropriate.

*Id.* (emphasis in the original).

The County of Summit and the City of Akron, Ohio are not seeking reimbursement for opioid prescriptions paid based on the allegation that they were medically unnecessary or medically inappropriate as cited in its Corrected Second Amended Complaint and Jury Demand, at Fn. 224., "Plaintiffs in this action do not assert any claim for spending on prescription opioids by their health plans, workers compensation, or other programs."

Therefore, CMO No. 1 ¶ 9(I)(iii) does not apply to the County of Summit and the City of Akron, Ohio.

Sincerely,

*/s/ Jodi Westbrook Flowers*

Jodi Westbrook Flowers