

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

*The County of Summit, Ohio, et al. v. Purdue
Pharma L.P., et al.*, Case No. 18-OP-45090

*The County of Cuyahoga v. Purdue Pharma
L.P.*, Case No. 17-OP-45004

*City of Cleveland v. AmerisourceBergen Drug
Corp.*, Case No. 18-OP-45132

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**MOTION FOR LEAVE TO FILE EMERGENCY MOTION TO ENJOIN THE
MASSACHUSETTS ATTORNEY GENERAL'S OFFICE FROM VIOLATING
THE MDL PROTECTIVE ORDER**

Defendants Purdue Pharma L.P., Purdue Pharma Inc., and The Purdue Frederick Company ("Purdue") move this Court for leave to file the annexed emergency motion for an Order enjoining the Massachusetts Attorney General's office from violating the terms of the MDL Protective Order [Doc. # 441].

For the reasons described in the annexed motion, Purdue urgently requests that the Court consider this emergency motion because Purdue faces an imminent risk of irreparable harm. The Massachusetts Attorney General's office, which obtained documents pursuant to the MDL Protective Order, is threatening to violate this Court's protective order by disclosing confidential information Purdue produced in this MDL in a Massachusetts proceeding without following the procedures applicable to challenges to confidentiality designations established by this Court.

Purdue has made diligent efforts to resolve this dispute in calls and communications with the Attorney General's Office, to no avail. Purdue now has no choice but to seek immediate court intervention to prevent what Purdue believes is a clear violation of the MDL Protective Order. The motion is specifically authorized by paragraph 81 of the MDL Protective Order.

Expedited consideration by this Court is critical because it is possible that at the hearing on the motion to impound *this coming Friday, December 21, 2018*, the judge presiding over the Massachusetts proceeding, Justice Janet L. Sanders, will permit the filing of an unredacted Amended Complaint containing references to and quotes from confidential Purdue documents.

Dated: December 19, 2018

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