



FILED

IN THE DISTRICT COURT OF CLEVELAND COUNTY  
STATE OF OKLAHOMA  
NOV 16 2017

STATE OF OKLAHOMA, *ex rel.*, MIKE HUNTER, )  
ATTORNEY GENERAL OF OKLAHOMA, )  
  
Plaintiff, )  
  
v. )  
  
PURDUE PHARMA L.P., *et al.*, )  
  
Defendants. )

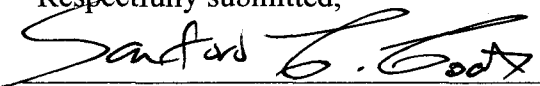
in the office of the  
Court Clerk MARILYN WILLIAMS

Case No. CJ-2017-816

**MOTION TO ASSOCIATE PATRICK JOSEPH FITZGERALD AS COUNSEL**

Defendants Purdue Pharma, L.P., Purdue Pharma, Inc. and The Purdue Frederick Company, Inc. hereby move the Court for an Order permitting out-of-state counsel Patrick Joseph Fitzgerald to practice in the above-styled and numbered cause pursuant to the Rules Creating and Controlling the Oklahoma Bar Association, 5 O.S. Ch. 1, App. 1, Art. II. This motion is supported by the attached "Signed Application" (Exhibit A), "Certificates of Good Standing" (Exhibit B), and the "Certificate of Compliance" from the Oklahoma Bar Association (Exhibit C).

DATED: November 16, 2017.

Respectfully submitted,  
  
\_\_\_\_\_  
SANFORD C. COATS, OBA #18268  
CULLEN D. SWEENEY, OBA #30269  
CROWE & DUNLEVY  
A Professional Corporation  
Braniff Building  
324 N. Robinson Ave., Suite 100  
Oklahoma City, Oklahoma 73102  
(405) 235-7700  
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sandy.coats@crowedunlevy.com  
cullen.sweeney@crowedunlevy.com

**ATTORNEYS FOR DEFENDANTS PURDUE  
PHARMA, L.P., PURDUE PHARMA, INC.  
AND THE PURDUE FREDERICK  
COMPANY, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 16th day of November, 2017, a true and correct copy of the above and foregoing was mailed, postage prepaid, to:

Mike Hunter  
Abby Dillsaver  
Ethan A. Shaner  
Attorney General's Office  
313 N.E. 21st Street  
Oklahoma City, Oklahoma 73105

Bradley E. Beckworth  
Jeffrey J. Angelovich  
Nix, Patterson & Roach, LLP  
512 North Broadway Avenue, Suite 200  
Oklahoma City, Oklahoma 73102

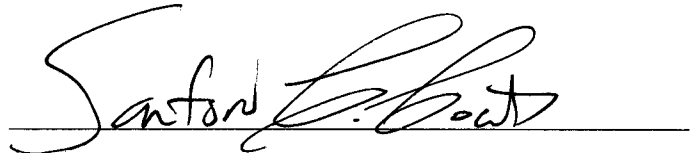
Tracy Schumacher  
Schumacher & Stanley, PLL  
114 East Main Street  
Norman, Oklahoma 73072

John H. Sparks  
Benjamin H. Odom  
Odom, Sparks & Jones, PLLC  
HiPoint Office Building  
2500 McGee Drive, Suite 140  
Norman, Oklahoma 73072

Michael Burrage  
Reggie Whitten  
Whitten Burrage  
512 North Broadway Avenue, Suite 300  
Oklahoma City, Oklahoma 73102

Glenn Coffee  
Glenn Coffee & Associates, PLLC  
915 North Robinson Avenue  
Oklahoma City, Oklahoma 73102

Robert G. McCampbell  
Travis V. Jett  
GableGotwals  
One Leadership Square, 15th Floor  
211 North Robinson  
Oklahoma City, Oklahoma 73102



Sanford L. Burt

# APPLICATION

# APPROVED



## OUT OF STATE ATTORNEY REGISTRATION

Patrick                      Joseph                      Fitzgerald , Applicant, respectfully represents:  
First Name                      Middle Name                      Last Name

1. Applicant is an attorney at law and a member of the law firm of Skadden, Arps, Slate, Meagher & Flom LLP

with its principal offices located at 4 Times Square  
Mailing Address  
New York , New York , NY , 10036  
City                      County                      State                      Zip Code  
(312) 407-0700 , (312) 407-0508 , (312) 827-9320  
Telephone (Firm)                      Telephone (Applicant's Direct Dial)                      Fax (Applicant)

Patrick.Fitzgerald@skadden.com . If Applicant's office address is different from above,  
E-mail Address (Applicant)

please provide the following: 155 North Wacker Drive, Suite 2700  
Mailing Address  
Chicago , Cook , IL , 60606  
City                      County                      State                      Zip Code

2. Applicant is admitted to practice and is a member in good standing (certificates of good standing attached) of the bar(s) of the highest state court(s) of the following state(s):

<u>State</u>	<u>Date of Admission</u>
<u>Illinois</u>	<u>10/30/2012</u>
<u>New York</u>	<u>02/26/1986</u>

3. Applicant is admitted to practice before the following United States District Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States, and/or other tribunals on the dates indicated for each, and is presently a member in good standing of the bars of said courts:

<u>Tribunal</u>	<u>Date of Admission</u>
<u>U.S. District Court for the Southern District of Illinois</u>	<u>08/04/2017</u>
<u>U.S. District Court for the Western District of Michigan</u>	<u>04/20/2017</u>
<u>U.S. District Court for the Eastern District of Wisconsin</u>	<u>03/25/2014</u>

U.S. District Court for the Northern District of Indiana 12/18/2012

U.S. District Court for the Northern District of Illinois 12/23/2011

U.S. District Court for the Eastern District of New York 05/27/1986

U.S. District Court for the Southern District of New York 05/27/1986

U.S. Court of Appeals for the Second Circuit 02/12/2009

Supreme Court of the United States 05/23/2005

4. Have you ever been suspended or disbarred in any court except as hereinafter provided (Give particulars; e.g. court, jurisdiction, date): No.

5. Are you currently subject to any pending disciplinary proceedings by any organization with authority to discipline attorneys at law except as hereinafter provided (Give particulars; e.g. court, discipline authority, date, status): No.

6. Have you ever received public discipline including, but not limited to, suspension or disbarment, by any organization with authority to discipline attorneys at law except as hereinafter provided (Give particulars; e.g. court, discipline authority, type of discipline, date, status): No.

7. Have you ever had any certificate or privilege to appear and practice before any regulatory or administrative body suspended or revoked except as hereinafter provided (Give particulars; e.g. administrative body, date, status of suspension or reinstatement): No.

8. Applicant seeks admission to practice in the State of Oklahoma in the following matter (give particulars; e.g. caption of case, court or agency, type of matter, party to be represented): **Note - A separate application is to be submitted for each matter in which the applicant seeks admission!**

State of Oklahoma v. Purdue Pharma L.P. et al., Case No. CJ-2017-816, District Court of Cleveland County; representing Defendants Purdue Pharma L.P.,

Purdue Pharma Inc., and The Purdue Frederick Company Inc.

9. The Oklahoma Bar Association member who is counsel of record for Applicant in this matter is:

Sanford                      C.                                  Coats                                  18268  
First Name                      Middle Name                      Last Name                      O.B.A. Number

324 N. Robinson Ave.                      Oklahoma City,                      OK                      73102  
Mailing Address                      City                      State                      Zip Code

(405) 235-7700                      (405) 239-6651,                      sandy.coats@crowedunlevy.com  
Telephone Number                      Fax Number                      E-mail Address

10. The following accurately represents the names of each party in this matter and the names and addresses of each counsel of record who appear for that party:

Party Name                      Counsel Name                      Address of Counsel

Please see addendum

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11. Applicant certifies that he/she shall be subject to the jurisdiction of the courts and disciplinary boards of this state with respect to the laws of this state governing the conduct of attorneys to the same extent as a member of the Oklahoma Bar Association.

12. Applicant understands and shall comply with the standards of professional conduct required of members of the Oklahoma Bar Association.

13. Applicant has disclosed in writing to the client that the Applicant is not admitted to practice in this jurisdiction and the client has consented to such representation.

I, Patrick J. Fitzgerald, do hereby swear/affirm under penalty of perjury that the assertions of this application are true:

I am the Applicant in the above referenced matter; I have read the foregoing and know the contents thereof; the same is true of my own knowledge except as to those matters therein stated on information and belief, and as to those matters I believe them to be true.

I further certify that I am subject to the jurisdiction of the Courts and disciplinary boards of this state with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the Oklahoma Bar Association; I understand and shall comply with the standards of professional conduct required by members of the Oklahoma Bar Association; and that I am subject to the disciplinary jurisdiction of the Oklahoma Bar Association with respect to any of my actions occurring in the course of such appearance.

DATED this 3<sup>rd</sup> day of November, 2017.

  
\_\_\_\_\_  
Applicant

Mail with check or money order (payable to the OBA) to:

Out-of-State Attorney Registration  
Oklahoma Bar Association  
P.O. Box 53036  
Oklahoma City, OK 73152-3036

**ADDENDUM to the Out of State Attorney Registration Application of Patrick J. Fitzgerald**

Item 10: The following accurately represents the names of each party in this matter and the names and addresses of each counsel of record who appear for that party:

<b>Party Name(s)</b>	<b>Counsel Name(s)</b>	<b>Address of Counsel</b>
Purdue Pharma L.P.; Purdue Pharma Inc.; and The Purdue Frederick Company Inc.	Sanford C. Coats Cullen D. Sweeney	324 N. Robinson Ave. Ste. 100, Oklahoma City, OK 73102
Cephalon, Inc.; Teva Pharmaceuticals USA, Inc.; Watson Laboratories, Inc.; Actavis LLC; and Actavis Pharma, Inc. f/k/a Watson Pharma, Inc.	Robert G. McCampbell Travis V. Jett	One Leadership Square, 15th Fl., 211 North Robinson, Oklahoma City, OK 73102-7255
Janssen Pharmaceuticals, Inc.; Johnson & Johnson; Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc.; and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc.	Benjamin H. Odom	HiPoint Office Building, 2500 McGee Drive Ste. 140, Oklahoma City, OK 73072
State of Oklahoma, ex rel., Mike Hunter, Attorney General of Oklahoma	Michael Burrage Reggie Whitten	512 N. Broadway Avenue, Suite 300, Oklahoma City, OK 73102
	Mike Hunter Abby Dillsaver Ethan A. Shaner	313 N.E. 21st Street, Oklahoma City, OK 73105
	Bradley E. Beckworth Jeffrey J. Angelovich	512 N. Broadway Avenue, Suite 200, Oklahoma City, OK 73102
	Glenn Coffee	915 N. Robinson Ave., Oklahoma City, OK 73102
	Tracy Schumacher	114 E. Main Street, Norman, OK 73072

# Certificate of Admission To the Bar of Illinois

I, Carolyn Taft Grosboll, Clerk of the Supreme Court of Illinois, do hereby certify that

Patrick Joseph Fitzgerald

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 10/30/2012 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto  
subscribed my name and affixed the  
seal of said Court, this 2nd day of  
November, 2017.

*Carolyn Taft Grosboll*

Clerk,  
Supreme Court of the State of Illinois

**Exhibit B**

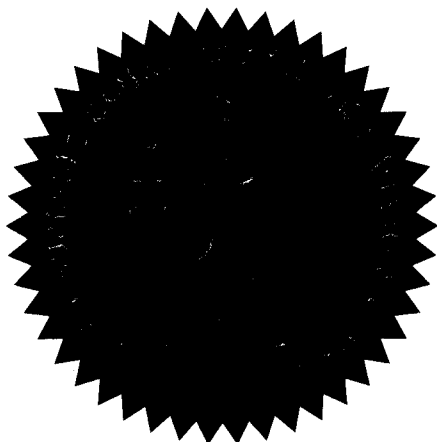




**Appellate Division of the Supreme Court  
of the State of New York  
Second Judicial Department**

I, **Aprilanne Agostino**, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that **Patrick J. Fitzgerald** was duly licensed and admitted to practice as an Attorney and Counselor-at-Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the **26<sup>th</sup>** day of **February 1986**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors-at-Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on **November 08, 2017**.



*Aprilanne Agostino*

Clerk of the Court



## Certificate of Compliance

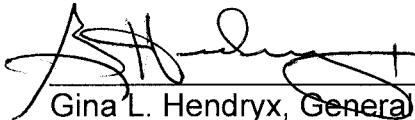
Oklahoma Bar Association  
1901 North Lincoln Boulevard  
Post Office Box 53036  
Oklahoma City, Oklahoma 73152-3036

The Oklahoma Bar Association, in response to the application of out-of-state attorney, submits the following certificate pursuant to 5 O.S. Ch.1 App.1, Art. II

1. Applicant has submitted a signed application of out-of-state attorneys, certificate(s) of good standing, and the non-refundable application fee pursuant to the Rules Creating and Controlling the Oklahoma Bar Association, 5 O.S. Ch. 1, App. 1, Art. II.
2. Date of Application: **November 15, 2017**
3. Application Number: **2017-512**
4. Applying Attorney: **Patrick Joseph Fitzgerald  
Skadden, Arps, Slate, Meagher & Flom LLP  
155 North Wacker Drive, Suite 2700  
Chicago, IL 60606**
5. The Application was: **GRANTED**

Dated this **15th** day of **November**, 20**17**.



  
Gina L. Hendryx, General Counsel  
Oklahoma Bar Association