STATE OF O



### FILED

# IN THE DISTRICT COURT OF CLEVELAND COUNTY STATE OF OKLAHOMA NOV 1 6 2017

| STATE OF OKLAHOMA, ex rel., MIKE HUNTER, ATTORNEY GENERAL OF OKLAHOMA, | ) In the office of the ) Court Clerk MARILYN WILLIAMS |
|------------------------------------------------------------------------|-------------------------------------------------------|
| Plaintiff,                                                             | )                                                     |
| v.                                                                     | ) Case No. CJ-2017-816                                |
| PURDUE PHARMA L.P., et al.,                                            | )                                                     |
| Defendants.                                                            | )<br>)                                                |

### MOTION TO ASSOCIATE R. RYAN STOLL 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 R. Ryan Stoll 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), "Certificate 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

(405) 239-6651 (Facsimile)

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

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# **APPLICATION**





### **OUT OF STATE ATTORNEY REGISTRATION**

| R. Ryan                                                                                      |                                      | Stoll                              | . Applicant.                            | respectfully re                       | presents:                               |
|----------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------|-----------------------------------------|---------------------------------------|-----------------------------------------|
|                                                                                              | Middle Name                          | Last Name                          | ,                                       | , , , , , , , , , , , , , , , , , , , | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, |
| 1. Applicant is a                                                                            | n attorney at la                     | w and a memb                       | er of the lav                           | w firm of <u>Skad</u>                 | den, Arps,                              |
| <u>Slate, Meagher</u>                                                                        | & Flom LLP                           |                                    |                                         |                                       |                                         |
| with its principal                                                                           | offices located                      |                                    | JAFE<br>failing Address                 |                                       |                                         |
| New Yor                                                                                      | <u>'k</u>                            |                                    |                                         | 10036                                 | ,                                       |
| City<br>(312) 407-0700                                                                       | (312                                 | County                             | State                                   | Zip Code<br>, (312) 407               | 7_8533                                  |
| (312) 407-0700<br>Telephone (Fir                                                             | m) T                                 | elephone (Applicant's              | Direct Dial)                            | Fax (Applicant)                       | -0000                                   |
| Ryan.Stoll@ska<br>E-mail Address (Applica                                                    | dden.com. If Ap                      | oplicant's office                  | address is                              | different from                        | above,                                  |
| please provide t                                                                             | he following: <u>1</u>               |                                    |                                         | uite 2700                             |                                         |
| Chicag                                                                                       | ο ,                                  | Cook<br>County                     | ailing Address                          | ,60606                                |                                         |
| City                                                                                         |                                      | County                             | State                                   | Zip Code                              | ······································  |
| 2. Applicant i                                                                               | is admitted to                       | practice and                       | is a men                                | mber in good                          | standing                                |
| (certificates of g                                                                           | _                                    | ttached) of the                    | bar(s) of the                           | he highest stat                       | te court(s)                             |
| <u>State</u>                                                                                 |                                      |                                    | <u>Da</u>                               | te of Admissio                        | <u>n</u>                                |
| Illinois                                                                                     |                                      |                                    | 11/                                     | /08/1990                              |                                         |
| 3. Applicant is<br>Courts, United S<br>States, and/or o<br>member in good<br><u>Tribunal</u> | States Circuit C<br>ther tribunals o | ourts of Appea<br>in the dates inc | I, the Supre<br>dicated for o<br>ourts: | eme Court of t                        | he United<br>resently a                 |
| Tribunai                                                                                     |                                      |                                    | <u>Da</u>                               | te of Admissio                        | <u>!!</u>                               |
| U.S. District Cour                                                                           | t for the Norther                    | n District of Illin                | ois 03/                                 | 23/1993                               |                                         |
| U.S. District Cour                                                                           | t for the Central                    | District of Illino                 | is 05/                                  | 19/2011                               |                                         |
| U.S. District Cour                                                                           | t for the Souther                    | n District of Illin                | ois 09/                                 | 06/2017                               |                                         |
| U.S. District Cour                                                                           | t for the Eastern                    | District of Mich                   | igan 02/                                | 14/2007                               |                                         |

| U.S. District Court for the Eastern District of Wisconsin                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 05/09/2003                                            |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|
| U.S. Court of Federal Claims                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 10/19/2002                                            |
| U.S. Court of Appeals for the Sixth Circuit                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 06/07/2007                                            |
| U.S. Court of Appeals for the Seventh Circuit                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 10/24/1995                                            |
| U.S. Court of Appeals for the Federal Circuit                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 08/21/2015                                            |
| 4. Have you ever been suspended or disbarred in a hereinafter provided (Give particulars; e.g. court, juri                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | •                                                     |
| 5. Are you currently subject to any pending discipling organization with authority to discipline attorneys at I provided (Give particulars; e.g. court, discipline authority to discipline authority discipline authority discipline authority discipline authority discipline authority discipline au | aw except as hereinafter                              |
| 6. Have you ever received public discipline including suspension or disbarment, by any organization with attorneys at law except as hereinafter provided (Give discipline authority, type of discipline, date, status):_                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | authority to discipline<br>e particulars; e.g. court, |
| 7. Have you ever had any certificate or privilege to a any regulatory or administrative body suspended or hereinafter provided (Give particulars; e.g. administrative suspension or reinstatement): No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | evoked except as                                      |
| 8. Applicant seeks admission to practice in the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | State of Oklahoma in the                              |
| following matter (give particulars; e.g. caption of ca                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | se, court or agency, type of                          |
| matter, party to be represented): Note - A sepa                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | arate application is to be                            |
| submitted for each matter in which the applicant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | seeks admission!                                      |
| State of Oklahoma v. Purdue Pharma L.P. et al., Ca                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | se No. CJ-2017-816, District                          |
| Court of Cleveland County; representing Defend                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | ants Purdue Pharma L.P                                |

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| Purdue        | e Pharma In                 | c., and <sup>-</sup>                   | The Purdue                   | Frederic                     | k Con           | npany          | Inc.                  |           |          |             |
|---------------|-----------------------------|----------------------------------------|------------------------------|------------------------------|-----------------|----------------|-----------------------|-----------|----------|-------------|
|               |                             |                                        |                              |                              |                 |                |                       |           |          |             |
| Applica       | ne Oklahon<br>ant in this m | atter is:                              | Association                  | _                            |                 | no is          |                       |           | record   | for         |
| Sanfor        |                             | C.<br>Middle Na                        |                              | Coats Last Name              | <u> </u>        |                | 1826                  |           |          |             |
| First Name    | 9                           | Middle Na                              | me                           | Last Name                    | )               | (              | O.B.A. Numb           | oer       |          |             |
|               | Robinson A                  | Ave.                                   | , <u>O</u> l                 | klahoma (<br>City            | <u>City</u> , _ | OK<br>State    | , <u>731</u><br>Zip C | 02<br>ode |          |             |
|               | 235-7700<br>Telephone Numb  | er                                     | , ( <u>405) 239</u><br>Fax N | 9 <u>-6651</u> , _<br>lumber | sand            | l <u>y.coa</u> | ts@crov<br>E-mail     |           |          | <u>om</u>   |
| 10. Th        | ne following                | accura                                 | tely represe                 | ents the r                   | names           | of e           | ach part              | y in      | this ma  | ıtter       |
| and th        | e names a                   | nd addre                               | esses of ea                  | ach coun                     | isel of         | reco           | rd who                | appe      | ear for  | that        |
| party:        |                             |                                        |                              |                              |                 |                |                       |           |          |             |
| Party N       | <u>Name</u>                 |                                        | Counsel N                    | <u>lame</u>                  |                 |                | Addr                  | ess (     | of Coun  | sel         |
| <u>Please</u> | see adden                   | dum                                    |                              |                              |                 |                |                       |           |          |             |
|               |                             |                                        |                              |                              |                 |                |                       |           |          |             |
|               |                             |                                        |                              |                              | ,               |                |                       |           |          |             |
|               |                             |                                        |                              |                              |                 |                |                       |           |          |             |
|               |                             | ······································ |                              |                              |                 | <u></u>        |                       |           |          | <del></del> |
|               |                             |                                        |                              |                              |                 |                |                       |           |          |             |
|               |                             |                                        |                              |                              |                 |                |                       |           |          |             |
| 11. Ap        | plicant cert                | ifies that                             | t he/she sha                 | all be sub                   | oject to        | o the j        | urisdicti             | on o      | f the co | urts        |
| and di        | isciplinary t               | ooards (                               | of this stat                 | te with r                    | espec           | ct to          | the law               | s of      | this s   | tate        |
| govern        | ing the cor                 | nduct of                               | attorneys                    | to the s                     | ame             | exten          | t as a                | mem       | ber of   | the         |
| Oklaho        | oma Bar Ass                 | sociation                              | t.                           |                              |                 |                |                       |           |          |             |
| 12. A         | pplicant und                | derstand                               | s and shall                  | comply                       | with t          | he st          | andards               | of p      | rofessio | onal        |

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, <u>R. Ryan Stoll</u> , 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                                                          |

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 \_\_\_\_ day of Norman

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

Form 200B

## ADDENDUM to the Out of State Attorney Registration Application of R. Ryan Stoll

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:

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

R. Ryan Stoll

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 11/08/1990 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.

Clerk,

Supreme Court of the State of Illinois

Carolyn Taff Gosboll



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: 2017-511
- 4. Applying Attorney: R. Ryan Stoll

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, 2017.



Gina L. Hendryx, General Counsel Oklahoma Bar Association