



IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel.,
MIKE HUNTER,
ATTORNEY GENERAL OF OKLAHOMA,

Plaintiff,

vs.

- (1) PURDUE PHARMA L.P.;
- (2) PURDUE PHARMA, INC.;
- (3) THE PURDUE FREDERICK COMPANY;
- (4) TEVA PHARMACEUTICALS USA, INC.;
- (5) CEPHALON, INC.;
- (6) JOHNSON & JOHNSON;
- (7) JANSSEN PHARMACEUTICALS, INC.;
- (8) ORTHO-McNEIL-JANSSEN
PHARMACEUTICALS, INC., n/k/a
JANSSEN PHARMACEUTICALS, INC.;
- (9) JANSSEN PHARMACEUTICA, INC.,
n/k/a JANSSEN PHARMACEUTICALS, INC.;
- (10) ALLERGAN, PLC, f/k/a ACTAVIS PLC,
f/k/a ACTAVIS, INC., f/k/a WATSON
PHARMACEUTICALS, INC.;
- (11) WATSON LABORATORIES, INC.;
- (12) ACTAVIS LLC; and
- (13) ACTAVIS PHARMA, INC.,
f/k/a WATSON PHARMA, INC.,

Defendants.

STATE OF OKLAHOMA } S.S.
CLEVELAND COUNTY }

FILED

SEP. 13 2018

In the office of the
Court Clerk MARILYN WILLIAMS

Case No. CJ-2017-816

Honorable Thad Balkman

MOTION TO ASSOCIATE COUNSEL

Defendants, Teva Pharmaceuticals, USA, Inc., Cephalon, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc., f/k/a Watson Pharma, Inc., hereby move the Court for an Order Permitting Mark A. Fiore 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).

Respectively Submitted,



Robert G. McCampbell, OBA No. 10390
Nicholas ("Nick") V. Merkley, OBA No. 20284
Ashley E. Quinn, OBA No. 33251
GABLEGOTWALS
One Leadership Square, 15th Fl.
211 North Robinson
Oklahoma City, OK 73102-7255
T: +1.405.235.3314
E-mail: RMcCampbell@Gablelaw.com
E-mail: NMerkeley@Gablelaw.com
E-mail: AQuinn@Gablelaw.com

OF COUNSEL:

Steven A. Reed
Harvey Bartle IV
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103-2921
T: +1.215.963.5000
E-mail: steven.reed@morganlewis.com
E-mail: harvey.bartle@morganlewis.com

Brian M. Ercole
MORGAN, LEWIS & BOCKIUS LLP
200 S. Biscayne Blvd., Suite 5300
Miami, FL 33131
T: +1.305.415.3416
E-mail: brian.ercole@morganlewis.com

Attorneys for non-parties

Pamela Costa and Tim Mullen

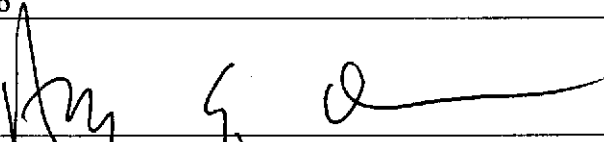
Attorneys for Defendants

***Cephalon, Inc., Teva Pharmaceuticals USA,
Inc., Watson Laboratories, Inc., Actavis LLC,
and Actavis Pharma, Inc. f/k/a Watson
Pharma, Inc.***

CERTIFICATE OF MAILING

I certify that a true and correct copy of the foregoing was mailed this 13th day of September 2018, by depositing it in the U.S. Mail, postage prepaid to:

<i>Attorneys for Plaintiff</i>	Mike Hunter, Attorney General Abby Dillsaver, General Counsel Ethan Shaner, Dep. Gen. Counsel ATTORNEY GENERAL'S OFFICE 313 N.E. 21st Street Oklahoma City, OK 73105	Bradley E. Beckworth Jeffrey J. Angelovich Lloyd N. Duck Lisa Baldwin NIX, PATTERSON & ROACH 512 N. Broadway Ave., Suite 200 Oklahoma City, OK 73102
	J. Revell Parrish Michael Burrage Reggie Whitten WHITTEN BURRAGE 512 N. Broadway Ave., Suite 300 Oklahoma City, OK 73102	Andrew G. Pate NIX PATTERSON & ROACH 3600 N. Capital of Texas Hwy. Suite 350 Austin, TX 78746
	Glenn Coffee GLENN COFFEE & ASSOCIATES 915 N. Robinson Ave. Oklahoma City, OK 73102	
<i>Attorneys for Purdue Pharma, LP, Purdue Pharma, Inc. and The Purdue Frederick Company</i>	Sheila L. Birnbaum Mark S. Cheffo Hayden Adam Coleman Paul LaFata DECHERT LLP Three Bryant Park 1095 Avenue of the Americas New York, NY 10036	Sandy Coats Joshua Burns CROWE & DUNLEVY 324 N. Robinson Ave., Suite 100 Oklahoma City, OK 73102
<i>Attorneys for Johnson & Johnson, Janssen Pharmaceutica, Inc., N/K/A Janssen Pharmaceutics, Inc., and Ortho-McNeil-Janssen Pharmaceutics, Inc. N/K/A Janssen Pharmaceutics, Inc.</i>	John Sparks Ben Odom ODOM SPARKS & JONES 2500 McGee Drive, Suite 140 Norman, OK 73072	Charles C. Lifland Jennifer D. Cardelus Wallace M. Allan Sabrina H. Strong O'MELVENY & MEYERS 400 S. Hope Street, 18 th Floor Los Angeles, CA 90071
	Stephen D. Brody David Roberts O'MELVENY & MEYERS 1625 Eye Street NW Washington, DC 20006	Daniel J. Franklin O'MELVENY & MEYERS LLP 7 Times Square New York, NY 10036



Ashley E. Quinn

EXHIBIT A

APPLICATION **APPROVED**

OUT OF STATE ATTORNEY REGISTRATION



Mark A. Fiore, Applicant, respectfully represents:
First Name Middle Name Last Name

1. Applicant is an attorney at law and a member of the law firm of Morgan, Lewis & Bockius, LLP with its principal offices located at: 502 Carnegie Center,

<u>Princeton</u>	<u>Mercer</u>	<u>NJ</u>	<u>08540</u>
<small>City</small>	<small>County</small>	<small>State</small>	<small>Zip Code</small>
<u>609-919-6600</u>	<u>609-919-6712</u>		<u>609-919-6701</u>
<small>Telephone (Firm)</small>	<small>Telephone (Applicant's Direct Dial)</small>		<small>Fax (Applicant)</small>

mark.fiore@morganlewis.com. If Applicant's office address is different from
E-mail Address (Applicant)

above, please provide the following: _____
Mailing Address

_____	_____	_____	_____
<small>City</small>	<small>County</small>	<small>State</small>	<small>Zip Code</small>

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>New Jersey</u>	<u>11/19/2010</u>
<u>Pennsylvania</u>	<u>11/8/2010</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, District of NJ</u>	<u>4/11/2012</u>
<u>U.S. District Court, Eastern District of PA</u>	<u>9/27/2013</u>
_____	_____
_____	_____
_____	_____

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 Cleveland County)

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

Robert G. McCampbell 10390
First Name Middle Name Last Name O.B.A. Number

One Leadership Square, 211 N. Robinson, 15 Fl. Oklahoma City, OK 73102
Mailing Address City State Zip Code

(405) 235-5576 (405) 235-2875 rmccampbell@gablelaw.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 attached.		

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, Mark A. Fiore, 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 5 day of September, 2018.

Mark A. Fiore, 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

APPLICATION OF MARK A. FIORE
OUT OF STATE ATTORNEY REGISTRATION

Response to item 10 on the Application:

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

Bradley E. Beckworth
Jeffrey J. Angelovich
Nix, Patterson & Roach
512 N. Broadway Ave., Suite 300
Oklahoma City, OK 73102

Sandy Coats
Crowe & Dunlevy
324 N. Robinson Ave., Suite 300
Oklahoma City, OK 73102

Michael Burrage
Reggie Whitten
Whitten Burrage
512 N. Broadway Ave., Suite 300
Oklahoma City, OK 73102

Glenn Coffee
Glenn Coffee & Associates
915 N. Robinson Avenue
Oklahoma City, OK 73102

John Sparks
Odom Sparks & Jones
2500 McGee Drive, Suite 140
Norman, OK 73072

EXHIBIT B

Supreme Court of New Jersey




Certificate of Good Standing

This is to certify that **MARK A FIORE**
(No. **038612010**) was constituted and appointed an Attorney at Law of New Jersey on **November 19, 2010** and, as such, has been admitted to practice before the Supreme Court and all other courts of this State as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.

Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.

In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
31ST day of August, 20 18


Clerk of the Supreme Court



Supreme Court of Pennsylvania

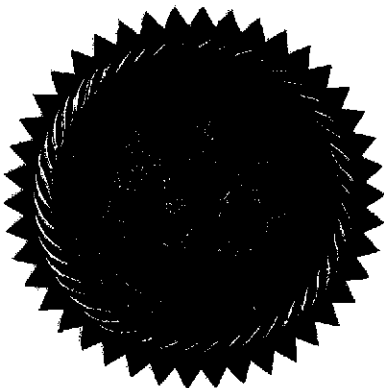
CERTIFICATE OF GOOD STANDING

Mark A. Fiore, Esq.

DATE OF ADMISSION

November 8, 2010

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: August 29, 2018

A handwritten signature in cursive script, reading "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk

EXHIBIT C



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: **September 10, 2018**
3. Application Number: **2018-428**
4. Applying Attorney: **Mark A. Fiore**
Morgan, Lewis & Bockius, LLP
502 Carnegie Center
Princeton, NJ 08540
5. The Application was: **GRANTED**

Dated this 10th day of September, 2018.



Loraine Farabow
First Assistant General Counsel
Oklahoma Bar Association