



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 }  
CLEVELAND COUNTY } S.S.

FILED

NOV 29 2018

In the office of the  
Court Clerk MARILYN WILLIAMS

Case No. CJ-2017-816

The Honorable Thad Balkman

MOTION TO ASSOCIATE COUNSEL

Plaintiff, State of Oklahoma ex rel., Mike Hunter, Attorney General of Oklahoma, hereby moves the Court for an Order permitting Robert Winn Cutler 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(s) of Good Standing (Exhibit B), and the "Certificate of Compliance" from the Oklahoma Bar Association (Exhibit C).

DATED: November 28<sup>9</sup>, 2018

Submitted by:

Michael Burrage

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the above and foregoing was emailed on November 28, 2018 to:

9

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Michael Burrage

# **EXHIBIT A**

# APPLICATION APPROVED



## OUT OF STATE ATTORNEY REGISTRATION

Robert Winn Cutler, Applicant, respectfully represents:  
First Name Middle Name Last Name

1. Applicant is an attorney at law and a member of the law firm of \_\_\_\_\_  
Nix Patterson, LLP

with its principal offices located at 3600 N Capital of Texas Highway, Suite B350

Austin, Travis, TX, 78746,  
City County State Zip Code  
(512) 328-5333, ( ) , (512) 328-5335,  
Telephone (Firm) Telephone (Applicant's Direct Dial) Fax (Applicant)

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

please provide the following: \_\_\_\_\_  
Mailing Address  
\_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_  
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>Texas</u>	<u>December 14, 2012</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>US District Court, Eastern District of Texas</u>	<u>2013</u>

US District Court, Western District of Texas

8/4/2014

US District Court, Northern District of Texas

2013

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, ex rel., Mike Hunter, Attorney General of Oklahoma v. Purdue Pharma, et al; District

Court of Cleveland County; Case No. CJ-2017-816; False Claims/Public Nuisance/Fraud; Requesting to

represent Plaintiff



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

Michael Burrage 1350  
First Name Middle Name Last Name O.B.A. Number  
512 No. Broadway Ave., Suite 300, Oklahoma City, OK, 73102,  
Mailing Address City State Zip Code  
( 405 ) 516-7800, ( 405 ) 916-7859, mburrage@whittenburrage.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:

<u>Party Name</u>	<u>Counsel Name</u>	<u>Address of Counsel</u>
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Please see attached sheet

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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, Robert Winn Cutler, 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 14th day of November, 2018.

  
\_\_\_\_\_  
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

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:

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512 N BROADWAY AVE STE 200  
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Churchman, Brooke A (Bar #31946)  
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okc, OK 73102

**Represented Parties**

OKLAHOMA STATE OF ex rel ATTORNEY  
GENERAL OF OKLAHOMA,

OKLAHOMA STATE OF ex rel ATTORNEY  
GENERAL OF OKLAHOMA,

OKLAHOMA STATE OF ex rel ATTORNEY  
GENERAL OF OKLAHOMA,

Purdue Pharma L P,  
Purdue Pharma Inc,  
Purdue Frederick Company,

OKLAHOMA STATE OF ex rel ATTORNEY  
GENERAL OF OKLAHOMA,

Purdue Frederick Company,  
Purdue Pharma Inc,  
Purdue Pharma L P,

OKLAHOMA STATE OF ex rel ATTORNEY  
GENERAL OF OKLAHOMA,

**Attorney**

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Kinney, David L (Bar #10875)  
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ODOM, BENJAMIN H (Bar #10917)  
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SUITE 140  
NORMAN, OK 73072

**Represented Parties**

Purdue Frederick Company,  
Purdue Pharma Inc,  
Purdue Pharma L P,

OKLAHOMA STATE OF ex rel ATTORNEY  
GENERAL OF OKLAHOMA,

OKLAHOMA STATE OF ex rel ATTORNEY  
GENERAL OF OKLAHOMA,

OKLAHOMA STATE OF ex rel ATTORNEY  
GENERAL OF OKLAHOMA,

Janssen Pharmaceuticals Inc,  
Janssen Pharmaceutica Inc,

OKLAHOMA STATE OF ex rel ATTORNEY  
GENERAL OF OKLAHOMA,

Ortho McNeil Janssen Pharmaceuticals Inc,  
Janssen Pharmaceuticals Inc,  
Janssen Pharmaceutica Inc,  
Johnson & Johnson,

TEVA Pharmaceuticals USA Inc,  
Cephalon Inc,  
Watson Laboratories Inc,  
Actavis LLC,  
Actavis Pharma Inc,

Ortho McNeil Janssen Pharmaceuticals Inc,  
Janssen Pharmaceutica Inc,  
Janssen Pharmaceuticals Inc,  
Johnson & Johnson,

**Attorney**

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Quinn, Ashley E (Bar #33251)  
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Whitten, Reggie (Bar #9576)  
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OKLAHOMA CITY, OK 73102

**Represented Parties**

Ortho McNeil Janssen Pharmaceuticals Inc,  
Johnson & Johnson,

OKLAHOMA STATE OF ex rel ATTORNEY  
GENERAL OF OKLAHOMA,

Cephalon Inc,  
TEVA Pharmaceuticals USA Inc,  
Watson Laboratories Inc,  
Actavis LLC,  
Actavis Pharma Inc,

Janssen Pharmaceutica Inc,  
Ortho McNeil Janssen Pharmaceuticals Inc,  
Johnson & Johnson,

OKLAHOMA STATE OF ex rel ATTORNEY  
GENERAL OF OKLAHOMA,

OKLAHOMA STATE OF ex rel ATTORNEY  
GENERAL OF OKLAHOMA,

Purdue Frederick Company,  
Purdue Pharma Inc,  
Purdue Pharma L P,

OKLAHOMA STATE OF ex rel ATTORNEY  
GENERAL OF OKLAHOMA,

# **EXHIBIT B**

# STATE BAR OF TEXAS



*Office of the Chief Disciplinary Counsel*

November 14, 2018

Re: Robert Winn Cutler, State Bar Number 24084364

To Whom It May Concern:

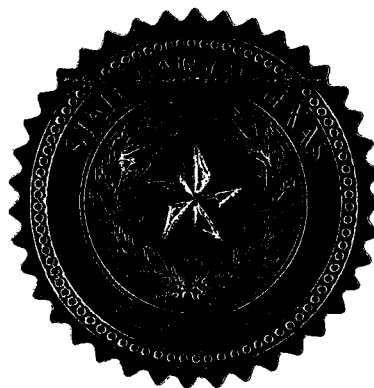
This is to certify that Robert Winn Cutler was licensed to practice law in Texas on December 14, 2012, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension from the practice of law.

This certification expires 30 days from the date, unless sooner revoked or rendered invalid by operation of rule or law.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Acevedo", written in a cursive style.

Linda A. Acevedo  
Chief Disciplinary Counsel  
LA/web



# The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

**Robert Winn Cutler**

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 14th day of December, 2012.

I further certify that the records of this office show that, as of this date

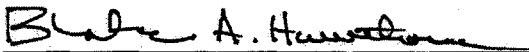
**Robert Winn Cutler**

is presently enrolled with the State Bar of Texas as an active member in good standing.

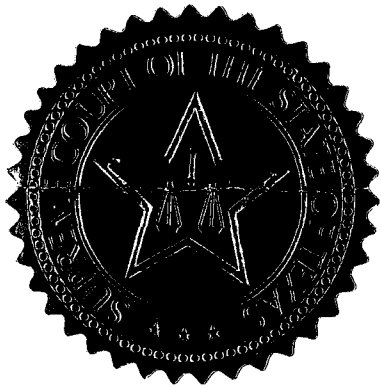
**IN TESTIMONY WHEREOF** witness my signature

and the seal of the Supreme Court of Texas at the City of Austin, this, the 14th day of November, 2018.

BLAKE HAWTHORNE, Clerk



Clerk, Supreme Court of Texas



No. 6958C.1



# EXHIBIT C



## Certificate of Compliance

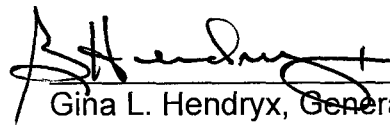
Oklahoma Bar Association  
1901 North Lincoln Boulevard  
Post Office Box 53036  
Oklahoma City, Oklahoma 73152-3036

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: **November 19, 2018**
3. Application Number: **2018-552**
4. Applying Attorney: **Robert Winn Cutler  
Nix Patterson, LLP  
3600 N. Capital of Texas Highway, Suite B350  
Austin, TX 78746**
5. The Application was: **GRANTED**

Dated this 19th day of November, 2018.



  
Gina L. Hendryx, General Counsel  
Oklahoma Bar Association