

IN THE DISTRICT COURT OF CLEVELAND COUNTY STATE OF OKLAHOMA STATE OF OKLAHOMA

NOV 2 1 2018

STATE OF OKLAHOMA, ex rel. MIKE HUNTER, ATTORNEY GENERAL OF OKLAHOMA,)	Court Clerk MARILYN WILLIAMS
Plaintiff,	Case No. CJ-2017-816
VS.)	Judge Thad Balkman
PURDUE PHARMA, L.P., ET AL. Defendants.	Special Master: William Hetherington
)	

MOTION TO ASSOCIATE COUNSEL JEFFREY A. BARKER, PRO HAC VICE

Defendants Johnson & Johnson, Janssen Pharmaceuticals, Inc., Janssen Pharmaceutica, Inc. N/K/A Janssen Pharmaceuticals, Inc., and Ortho-McNeil-Janssen Pharmaceuticals, Inc. N/K/A Janssen Pharmaceuticals, Inc., (collectively, "Johnson & Johnson"), hereby move the Court for an Order permitting **JEFFREY A. BARKER**, to practice in the above styled and numbered cause only (*Pro Hac Vice*) 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).

Respectfully submitted,

Benjamin H. Odom, OBA No. 10917

John H. Sparks, OBA No. 15661

Michael W. Ridgeway, OBA No. 15657

David L. Kinney, OBA No. 10875 ODOM, SPARKS & JONES, PLLC

Suite 140

HiPoint Office Building

2500 McGee Drive

Norman, OK 73072

Telephone: (405) 701-1863 Facsimile: (405) 310-5394

Email: odomb@odomsparks.com Email: sparksj@odomsparks.com Email: ridgewaym@odomsparks.com Email: kinneyd@odomsparks.com

Larry D. Ottaway, OBA No. 6816 Amy Sherry Fischer, OBA No. 16651 FOLIART, HUFF, OTTAWAY & BOTTOM 12th Floor

201 Robert S. Kerr Avenue Oklahoma City, OK 73102 Telephone: (405) 232-4633

Facsimile: (405) 232-3462

Email: larryottaway@oklahomacounsel.com Email: amyfischer@oklahomacounsel.com

Of Counsel:

Charles C. Lifland
Jennifer D. Cardelús
Wallace Moore Allan
Sabrina H. Strong
Houman Eshan
Esteban Rodriguez
O'MELVENY & MYERS, LLP
400 S. Hope Street
Los Angeles, CA 90071
Telephone: (213) 430-6000

Facsimile: (213) 430-6407 Email: clifland@omm.com

Email: jcardelus@omm.com
Email: tallan@omm.com
Email: sstrong@omm.com
Email: heshan@omm.com
Email: erodriguez2@omm.com

Amy R. Lucas
O'MELVENY & MYERS, LLP
8th Floor
1999 Avenue of the Stars
Los Angeles, CA 90067
Telephone: (310) 553-6700
Facsimile: (310) 246-6779
Email: alucas@omm.com

Stephen D. Brody David Roberts O'MELVENY & MYERS, LLP 1625 Eye Street NW Washington, DC 20006 Telephone: (202) 383-5300 Facsimile: (202) 383-5414 Email: sbrody@omm.com Email: droberts2@omm.com

Daniel J. Franklin
Ross B. Galin
Desirae K.C. Tongco
O'MELVENY & MYERS, LLP
7 Times Square
New York, NY 10036
Telephone: (212) 326-2000
Facsimile: (212) 326-2061
Email: dfranklin@omm.com
Email: rgalin@omm.com
Email: dtongco@omm.com

COUNSEL FOR DEFENDANTS
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.

CERTIFICATE OF MAILING

a true and correct copy of the above and foregoing has been served via electronic mail, to the following:

Mike Hunter

ATTORNEY GENERAL FOR

THE STATE OF OKLAHOMA

Abby Dillsaver

Ethan Shaner

GENERAL COUNSEL TO

THE ATTORNEY GENERAL

313 NE 21st

Oklahoma City, OK 73105

Telephone:

(405)521-3921

Facsimile:

(405) 521-6246

Email: mike.hunter@oag.ok.gov

Email: abby.dillsaver@oag.ok.gov

Email: ethan.shaner@oag.ok.gov

Michael Burrage

Reggie Whitten

J. Revell Parrish

WHITTEN BURRAGE

Suite 300

512 North Broadway Avenue

Oklahoma City, OK 73102

Telephone:

(405) 516-7800

Facsimile:

(405) 516-7859

Email: mburrage@whittenburragelaw.com

Email: rwhitten@whittenburragelaw.com Email: rparrish@whittenburragelaw.com

Bradley Beckworth

Jeffrey Angelovich

Lloyd Nolan Duck, III

Andrew Pate

Lisa Baldwin

Brooke A. Churchman

NIX, PATTERSON, LLP

Suite 200

512 North Broadway Avenue

Oklahoma City, OK 73102

Telephone:

(405) 516-7800

Facsimile:

(405) 516-7859

Email: bbeckworth@nixlaw.com
Email: jangelovich@nixlaw.com
Email: tduck@nixlaw.com
Email: dpate@nixlaw.com
Email: lbaldwin@nixlaw.com
Email: bchurchman@nixlaw.com

Glenn Coffee
GLENN COFFEE & ASSOCIATES, PLLC
915 North Robinson Avenue
Oklahoma City, OK 73102
Telephone: (405) 601-1616
Email: gcoffee@glenncoffee.com

ATTORNEYS FOR PLAINTIFF

Sanford C. Coats

Joshua D. Burns

CROWE & DUNLEVY, PC

Suite 100

Braniff Building

324 North Robinson Avenue

Oklahoma City, OK 73102

Telephone: (405) 235-7700

Facsimile:

(405) 272-5269

Email: sandy.coats@crowedunlevy.com Email: joshua.burns@crowedunlevy.com

Of Counsel:

Sheila Birnbaum

Mark S. Cheffo

Hayden A. Coleman

Paul A. LaFata

Jonathan S. Tam

Lindsay N. Zanello

Bert L. Wolff

DECHERT, LLP

Three Bryant Park

1095 Avenue of Americas

New York, NY 10036-6797

Telephone:

(212) 698-3500

Facsimile:

(212) 698-3599

Email: sheila.birnbaum@dechert.com

Email: mark.cheffo@dechert.com

Email: hayden.coleman@dechert.com

Email: paul.lafata@dechert.com

Email: jonathan.tam@dechert.com

Email: lindsay.zanello@dechert.com

Email: bert.wolff@dechert.com

Benjamin F. McAnaney

Dechert, LLP

2929 Arch Street

Philadelphia, PA 19104

Telephone: (215) 994-4000

Facsimile: (215) 655-2043

Email: benjamin.mcananey@dechert.com

Erik W. Snapp

DECHERT, LLP

Suite 3400

35 West Wacker Drive

Chicago, IL 60601

Telephone: (212)849-7000 Facsimile: (212) 849-7100

Email: erik.snapp@dechert.com

Robert S. Hoff WIGGIN & DANA, LLP 265 Church Street New Haven, CT 06510

Telephone: (203) 498-4400 Facsimile: (203) 363-7676 Email: rhoff@wiggin.com

Britta E. Stanton John D. Volney John T. Cox, III

Eric W. Pinker

LYNN PINKER COX & HURST, LLP

Suite 2700

2100 Ross Avenue

Dallas, TX 75201

Telephone: (214) 981-3800 Facsimile: (214) 981-3839 Email: bstanton@lynnllp.com Email: jvolney@lynnllp.com Email: tcox@lynnllp.com Email: epinker@lynnllp.com

ATTORNEYS FOR DEFENDANTS PURDUE PHARMA, LP, PURDUE PHARMA, INC., AND THE PURDUE FREDERICK COMPANY, INC.

Robert G. McCampbell

Travis V. Jett

Ashley E. Quinn

Nicholas V. Merkley

GABLEGOTWALS

15th Floor

One Leadership Square

211 North Robinson

Oklahoma City, OK 73102-7255

Telephone:

(405) 235-5567

Email: rmccampbell@gablelaw.com

Email: tjett@gablelaw.com Email: aquinn@gablelaw.com Email: nmerkley@gablelaw.com

Of Counsel:

Steven A. Reed Rebecca J. Hillyer MORGAN, LEWIS & BOCKIUS, LLP 1701 Market Street Philadelphia, PA 19103-2321 Telephone: (215) 963-5000

Email: steven.reed@morganlewis.com Email: rebecca.hillyer@morganlewis.com

Harvey Bartle, IV Mark A. Fiore MORGAN, LEWIS& BOCKIUS, LLP 502 Carnegie Center Princeton, NJ 08540-6241 Telephone: (609) 919-6600

Email: harvey.bartle@morganlewis.com Email: mark.fiore@morganlewis.com

Brian M. Ercole MORGAN, LEWIS & BOCKIUS, LLP Suite 5300 200 South Biscayne Boulevard Miami, FL 33131 Email: brian.ercole@morganlewis.com

ATTORNEYS FOR DEFENDANTS CEPHALON, INC., TECA PHARMACEUTICALS USA, INC., WATSON LABORATORIES, INC., ACTAVIS, LLC, AND ACTAVIS PHARMA, INC. F/K/A WATSON PHARMA, INC.

Family

Benjamin H. Odom

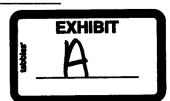
COUNSEL FOR DEFENDANTS
JANSSEN PHARMACEUTICALS, INC.,
JOHNSON & JOHNSON, JANSSEN
PHARMACEUTICA, INC. N/K/A
JANSSEN PHARMACEUTICALS, INC.,
AND ORTHO-MCNEIL-JANSSEN
PHARMACEUTICALS, INC. N/K/A/
JANSSEN PHARMACEUTICALS, INC.

APPLICATION





Jeffrey	Allen	<u>Barker</u>	, Applicant,	respectfully represents
First Name	Middle Name	Last Name		
1. Applicant	is an attorney at	law and a mem	nber of the law	v firm of
O'Melven	y & Myers LLP			
with its princ	ipal offices locat	ed at61	O Newport Ce Mailing Address	nter Drive
Newport E		Orange Co County	unty	, <u>CA</u> , <u>92660</u> State Zip Code
(949)823-6	900			
Telephone	(Firm)	Telephone (Applicar	nt's Direct Dial)	, (<u>949</u>) <u>823-6994</u> , Fax (Applicant)
jbarker@om E-mail Address (Ap		Applicant's offic	e address is	different from above,
please provid	de the following:			
			Mailing Address	
Cit	ty ,	County	State	Zip Code
2. Applicant	is admitted to pr	ractice and is a	member in go	ood standing (certificates
of good stand	ding attached) of	the bar(s) of the	e highest state	e court(s) of the following
state(s):				
<u>State</u>			<u>Da</u>	te of Admission
California			De	cember 2, 1993
Courts, Unite States, and/	ed States Circuit	t Courts of App s on the dates	eal, the Supreindicated for e	g United States Districeme Court of the United each, and is presently a
<u>Tribur</u>	<u>nal</u>		<u>Da</u>	te of Admission
5th Circuit			Jar	nuary 7, 2008
9th Circuit			Ма	rch 30, 2016
E.D. Ark.				oruary 25, 2011
W.D. Ark.				oruary 25, 2011
C D Cal			De	cember 2, 1993



E.D. Cal.	May 8, 1997			
N.D Cal.	July 20, 1999			
S.D. Cal.	August 16, 2010			
4. Have you ever been suspended of hereinafter provided (Give particulars				
organization with authority to disciplin	ending disciplinary proceedings by any ne attorneys at law except as hereinafter discipline authority, date, status): No			
6. Have you ever received public dis suspension or disbarment, by any orgattorneys at law except as hereinafte discipline authority, type of discipline.	ganization with authority to discipline r provided (Give particulars; e.g. court,			
any regulatory or administrative body	or privilege to appear and practice before suspended or revoked except as s; e.g. administrative body, date, status of			
•	tice in the State of Oklahoma in the following			
matter (give particulars; e.g. caption of	of case, court or agency, type of matter, party			
to be represented): Note - A separa	te application is to be submitted for each			
matter in which the applicant seek	s admission! State of Oklahoma, ex rel.,			
Mike Hunter, Attorney General of Okl	ahoma v. Purdue Pharma L.P., et al., No. CJ-			
2017-816 (Cleveland Cty. Dist Ct.).	Applicant seeks to represent Defendants			
Janssen Pharmaceuticals, Inc., its p	arent company Johnson & Johnson, and its			
predecessors Janssen Pharmace	eutica, Inc., and Ortho-McNeil-Janssen			
Pharmaceuticals, Inc.				

	sociation member win	o is couriser of record for Applicant
in this matter is:		
John H.	<u>Sparks</u>	OBA No. 15661
Name Middle Name		O.B.A. Number
Odom, Sparks & Jones P		
HiPoint Ofc. Bldg., 2500 M	McGee Drive, Ste. 140	0, Oklahoma City, OK 73072
Mailing Address		City State Zip Code
(<u>405</u>) 701-1863	(<u>405) 310-5394</u>	sparksj@odomsparks.com
Telephone Number	Fax Number	E-mail Address
10. The following accurat	aly raprocents the nex	man of anoth north in this matter and
To. The following accurat	ciy represents the nai	nes of each party in this matter and
the names and addresses	s of each counsel of re	ecord who appear for that party:
Party Name	Counsel Name	Address of Counsel
		•
See attached addendum	<u>'</u>	
	_	
		<u> </u>
		•
11 Applicant certifies the	at he/she shall he suh	ject to the jurisdiction of the courts
11. Applicant certifies the	at hersile shall be sub	ject to the jurisdiction of the courts
and disciplinary boards of	this state with respec	t to the laws of this state governing
the conduct of attorneys	to the same extent a	s a member of the Oklahoma Bar
Association.		
12. Applicant understand	ds and shall comply	with the standards of professional
, , , р р с с с с с		
conduct required of memb	here of the Oklahoma	Bar Association
conduct required of memi	ocia di ule Oriandilia	Dai 71990ciation.
40 Ammlianntlana dia dia		miliantika Ammilianut la mat admilit ad
13. Applicant has disclose	ea in writing to the clie	nt that the Applicant is not admitted
to practice in this jurisdicti	ion and the client has	consented to such representation.

I, <u>Jeffrey A. Barker</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 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 ___

November, 2018.

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 APPLICATION FOR OUT OF STATE ATTORNEY REGISTRATION STATE OF OKLAHOMA

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

<u>Counsel Name</u>: Steven A. Reed, Harvey Bartle IV, Jeremy A. Menkowitz, Brian M. Ercole

Address of Counsel: Morgan, Lewis & Bockius LLP, 1701 Market Street, Philadelphia, PA 19103-2921 and 200 S. Biscayne Blvd., Suite 5300, Miami, FL 33131

Counsel Name: Patrick J. Fitzgerald, R. Ryan Stoll

Address of Counsel: Skadden, Arps, Slate, Meagher & Flom LLP, 155 North Wacker Drive, Suite 2700, Chicago, IL 60606

<u>Counsel Name</u>: Robert G. McCampbell, Travis V. Jett, Ashley E. Quinn, and Nick Merkley

<u>Address of Counsel</u>: Gable Gotwals, 211 N. Robinson, 15th Floor, Oklahoma City, OK 73102

<u>Party Name</u>: Johnson & Johnson, Janssen Pharmaceuticals, Inc., Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals Inc., and Ortho-McNeil-Janssen Pharmaceuticals, Inc., n/k/a/ Janssen Pharmaceuticals, Inc.

Counsel Name: Benjamin H. Odom, John H. Sparks, Michael W. Ridgeway

Address of Counsel: Odom, Sparks & Jones, 2500 McGee Dr., Ste. 140, Oklahoma City, OK 73072

Counsel Name: Stephen D. Brody, David Roberts

Address of Counsel: O'Melveny & Myers LLP, 1625 Eye Street, NW, Washington, DC 20006

<u>Party Name</u>: Purdue Pharma LP, Purdue Pharma, Inc., and The Purdue Frederick Company

Counsel Name: Sanford C. Coates, Cullen D. Sweeney, Joshua D. Burns

<u>Address of Counsel</u>: Crowe & Dunlevy, 324 N. Robinson Ave., Ste. 100, Oklahoma City, OK 73102

<u>Counsel Name</u>: Sheila Birnbaum, Mark S. Cheffo, Hayden A. Coleman, Paul A. Lafata, Bert L. Wolff

Address of Counsel: Dechert LLP, Three Bryant Park, 1095 Avenue of the Americas, New York, NY 10036

Party Name: State of Oklahoma, ex rel., Mike Hunter, Attorney General of Oklahoma

Counsel Name: Mike Hunter, Abby Dillsaver, Ethan A. Shaner

Address of Counsel: Attorney General's Office, 313 N.E. 21st Street, Oklahoma, OK 73105

Counsel Name: Bradley E. Beckworth, Jeffrey J. Angelovich

Address of Counsel: Nix, Patterson & Roach LLP, 512 North Broadway Avenue, Suite 200, Oklahoma, OK 73102

Counsel Name: Michael Burrage, Reggie Whitton, Whitten Burrage

Address of Counsel: Whitten Burrage Law Firm, 512 North Broadway Avenue, Suite 200, Oklahoma, OK 73102

Counsel Name: Ms. Brooke A. Churchman

Address of Counsel: 3600 Martin Luther King Blvd., Oklahoma City, Ok 73111-4223

Counsel Name: V. Glenn Coffee, II

Address of Counsel: Oklahoma Secretary of State, 2300 N Lincoln Blvd., Suite 101, Oklahoma City, OK 73105



Supreme Court of California

JORGE E. NAVARRETE

Clerk and Executive Officer of the Supreme Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT

OF THE

STATE OF CALIFORNIA

JEFFREY ALLEN BARKER

I, JORGE E. NAVARRETE, Clerk/Executive Officer of the Supreme Court of the State of California, do hereby certify that **JEFFREY ALLEN BARKER**, #166327, was on the **2nd** day of **December**, 1993, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.

Witness my hand and the seal of the court on the 5th day of November, 2018.

JORGE E. NAVARRETE

Clerk/Executive Officer of the Supreme Court

Rv

Robert R. Toy, Senior Deputy Clerk

EXHIBIT B



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 9, 2018
- 3. Application Number: 2018-545
- 4. Applying Attorney: Jeffrey Allen Barker

O'Melveny & Myers LLP 610 Newport Center Drive Newport Beach, CA 92660

5. The Application was: **GRANTED**

Dated this <u>9th</u> day of <u>November</u>, 20<u>18</u>.



Loraine Farabow

First Assistant General Counsel Oklahoma Bar Association

