



IN THE DISTRICT COURT OF CLEVELAND COUNTY

STATE OF OKLAHOMA

STATE OF OKLAHOMA, )  
ATTORNEY GENERAL HUNTER, )  
CLEVELAND COUNTY, )  
FILED, )

Plaintiff, )

v. )

PURDUE PHARMA L.P., et al., )  
In the office of the )  
Court Clerk MARILYN WILLIAMS )

Defendants. )

Case No. CJ-2017-816

MOTION TO ASSOCIATE BERT L. WOLFF 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 Bert L. Wolff 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: October 4, 2018.

Respectfully submitted,

SANFORD C. COATS, OBA #18268  
JOSHUA D. BURNS, OBA #32967  
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  
joshua.burns@crowedunlevy.com

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

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing was mailed, postage prepaid, this \_\_\_\_ day of October, 2018 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  
Lloyd "Trey" Nolan Duck, III  
Andrew Pate  
Lisa Baldwin  
Nix, Patterson & Roach, LLP  
512 North Broadway Avenue, Suite 200  
Oklahoma City, Oklahoma 73102

Robert G. McCampbell  
Nicholas V. Merkley  
GableGotwals  
One Leadership Square, 15th Floor  
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Oklahoma City, Oklahoma 73102

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1701 Market Street  
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Reggie Whitten  
Whitten Burrage  
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Oklahoma City, Oklahoma 73102

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Oklahoma City, Oklahoma 73102

Benjamin H. Odom  
John H. Sparks  
Michael W. Ridgeway  
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Norman, Oklahoma 73072

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200 S. Biscayne Blvd., Suite 5300  
Miami, FL 33131

Stephen D. Brody  
O'Melveny & Myers, LLP  
1625 Eye Street NW  
Washington, DC 20006



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# APPLICATION

# APPROVED



## OUT OF STATE ATTORNEY REGISTRATION

Bert L. Wolff, Applicant, respectfully represents:  
First Name Middle Name Last Name

1. Applicant is an attorney at law and a member of the law firm of Dechert LLP  
with its principal offices located at

Three Bryant Park, 1095 Avenue of the Americas  
Mailing Address

New York New York NY, 10036-6797,  
City County State Zip Code  
(212) 698-3500, (212) 698-3569, (212) 698-3599  
Telephone (Firm) Telephone (Applicant's Direct Dial) Fax (Applicant)

bert.wolff@dechert.com.  
E-mail Address (Applicant)

If Applicant's office address is different from above,

please provide the following: \_\_\_\_\_  
Mailing Address  
\_\_\_\_\_  
City County State Zip Code

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

<u>State</u>	<u>Date of Admission</u>
<u>New York</u>	<u>05/01/1985</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:

**Exhibit A**

<u>Tribunal</u>	<u>Date of Admission</u>
Supreme Court of the United States	10/29/1990
U.S.C.A. Second Circuit	02/28/2018
U.S.C.A. Third Circuit	01/06/1999
U.S.C.A. Fourth Circuit	02/14/2017
U.S.C.A. Fifth Circuit	05/21/1996
U.S.C.A. Tenth Circuit	09/13/1995
Eastern District of New York	10/16/1985
Northern District of New York	01/23/1990
Southern District of New York	10/23/1985
Western District of New York	04/18/1994
Central District of Illinois	03/25/1999

4. Applicant is not currently suspended or disbarred in any court except as hereinafter provided (Give particulars; e.g. court, jurisdiction, date): No.

5. Applicant is not 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. Applicant has never 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. Applicant has never had any certificate or privilege to appear and practice before any regulatory or administrative body suspended or revoked except as hereinafter provided (Give particulars; e.g. administrative body, date, status of suspension or reinstatement): No.

8. Applicant seeks admission to practice in the State of Oklahoma in the following matter (give particulars; e.g. caption of case, court or agency, type of matter, party to be represented): **Note - A separate application is to be submitted for each matter in which the applicant seeks admission!** State of Oklahoma v. Purdue Pharma L.P., et al., Case No. CJ-2017-816, District Court of

Cleveland County; representing Purdue Pharma L.P., Purdue Pharma Inc., and  
The Purdue Frederick Company Inc.

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

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

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

(405) 235-7700                      (405) 239-6651  
Telephone Number                      Fax Number

sandy.coats@crowedunlevy.com  
E-mail Address

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

Party Name                      Counsel Name                      Address of Counsel

Please see addendum  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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.

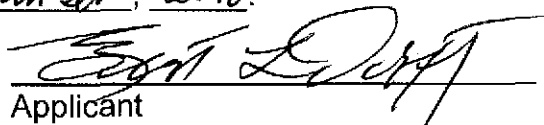
13. Applicant has disclosed in writing to the client that the Applicant is not admitted to practice in this jurisdiction and the client has consented to such representation.

I, Bert L. Wolff, 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 27<sup>th</sup> day of September, 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

**ADDENDUM to the Out of State Attorney Registration Application of Bert L. Wolff**

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

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





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

I, **Aprilanne Agostino**, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that **Bert Laurence Wolff** was duly licensed and admitted to practice as an Attorney and Counselor-at-Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the 1st day of **May 1985**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors-at-Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on **September 28, 2018**.



*Aprilanne Agostino*

Clerk of the Court

**Exhibit B**



## Certificate of Compliance

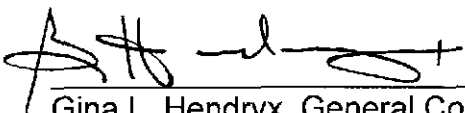
Oklahoma Bar Association  
1901 North Lincoln Boulevard  
Post Office Box 53036  
Oklahoma City, Oklahoma 73152-3036

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: **October 3, 2018**
3. Application Number: **2018-468**
4. Applying Attorney: **Bert L. Wolff  
Dechert LLP  
Three Bryant Park  
1095 Avenue of the Americas  
New York, NY 10036**
5. The Application was: **GRANTED**

Dated this 3rd day of October, 2018.



  
Gina L. Hendryx, General Counsel  
Oklahoma Bar Association