



IN THE DISTRICT COURT OF CLEVELAND COUNTY

STATE OF OKLAHOMA,)
ATTORNEY GENERAL OF OKLAHOMA,)
vs.)
MICHAEL HUNTER,)
CLEVELAND COUNTY,)

Plaintiff,

v.

PURDUE PHARMA L.P., et al.,)

Defendants.)

STATE OF OKLAHOMA
CLEVELAND COUNTY
FILED

FEB 11 2019

In the office of the
Court Clerk MARILYN WILLIAMS
Case No. CJ-2017-816

MOTION TO ASSOCIATE MICHAEL TUCKER COLE 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 Michael Tucker Cole 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: February 8, 2019.

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 e-mailed, this 11 day of February, 2019 to:

WHITTEN BURRAGE
Michael Burrage
Reggie Whitten
512 N. Broadway Avenue, Suite 300
Oklahoma City, OK 73102
mburrage@whittenburrage.com
rwhitten@whittenburrage.com
Counsel for Plaintiff the State of Oklahoma

NIX, PATTERSON & ROACH, LLP
Bradley E. Beckworth
Jeffrey J. Angelovich
Lloyd "Trey" Nolan Duck, III
Andrew Pate
Lisa Baldwin
Nathan B. Hall
512 N. Broadway Ave., Suite 200
Oklahoma City, OK 73102
bbeckworth@nixlaw.com
jangelovich@npraustin.com
tduck@nixlaw.com
dpate@nixlaw.com
lbaldwin@nixlaw.com
nhall@nixlaw.com
Counsel for Plaintiff the State of Oklahoma

ODOM, SPARKS & JONES PLLC
Benjamin H. Odom
John H. Sparks
Michael W. Ridgeway
David L. Kinney
HiPoint Office Building
2500 McGee Drive Ste. 140
Oklahoma City, OK 73072
odomb@odomsparks.com
sparksj@odomsparks.com
ridgewaym@odomsparks.com
kinneyd@odomsparks.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/*

OKLAHOMA OFFICE OF THE
ATTORNEY GENERAL
Mike Hunter
Abby Dillsaver
Ethan A. Shaner
313 NE 21st St
Oklahoma City, OK 73105
abby.dillsaver@oag.ok.gov
ethan.shaner@oag.ok.gov
Counsel for Plaintiff the State of Oklahoma

GLENN COFFEE & ASSOCIATES, PLLC
Glenn Coffee
915 N. Robinson Ave.
Oklahoma City, OK 73102
gcoffee@glenncoffee.com
Counsel for Plaintiff the State of Oklahoma

FOLIART, HUFF, OTTAWAY &
BOTTOM
Larry D. Ottaway
Amy Sherry Fischer
201 Robert S. Kerr Avenue, 12th Floor
Oklahoma City, OK 73102
larryottaway@oklahomacounsel.com
amyfischer@oklahomacounsel.com
*Attorneys for 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 and Ortho-
McNeil-Janssen Pharmaceuticals, Inc.
n/k/a/ Janssen Pharmaceuticals, Inc.*

O'MELVENY & MYERS LLP
Charles C. Lifland
Jennifer D. Cardelús
400 S. Hope Street
Los Angeles, CA 90071
clifland@omm.com
jcardelus@omm.com
Counsel for Defendants Janssen

Janssen Pharmaceuticals, Inc and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a/ Janssen Pharmaceuticals, Inc.

O'MELVENY & MYERS LLP

Stephen D. Brody
David K. Roberts
1625 Eye Street NW
Washington, DC 20006
sbrody@omm.com
droberts2@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 and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a/ Janssen Pharmaceuticals, Inc.

DECHERT, LLP

Sheila Birnbaum
Mark S. Cheffo
Hayden A. Coleman
Paul A. LaFata
Jonathan S. Tam
Erik Snapp
Three Bryant Park
1095 Avenue of the Americas
New York, New York 10036
sheila.birnbaum@dechert.com
mark.cheffo@dechert.com
hayden.coleman@dechert.com
paul.lafata@dechert.com
jonathan.tam@dechert.com
erik.snapp@dechert.com
Counsel for Purdue Pharma L.P., Purdue Pharma Inc. and The Purdue Frederick Company Inc.

GABLEGOTWALS

Robert G. McCampbell
Nicholas V. Merkley
Ashley E. Quinn
One Leadership Square, 15th Fl.
211 North Robinson
Oklahoma City, OK 73102-7255
RMcCampbell@Gablelaw.com

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.

LYNN PINKER COX & HURST, LLP

Eric Wolf Pinker
John Thomas Cox III
Lynn Pinker Cox & Hurst, LLP
2100 Ross Avenue, Suite 2700
Dallas, TX 75201
epinker@lynnllp.com
tcox@lynnllp.com
Counsel for Purdue Pharma L.P., Purdue Pharma Inc. and The Purdue Frederick Company Inc.

MORGAN, LEWIS & BOCKIUS LLP

Steven A. Reed
Harvey Bartle IV
Rebecca Hillyer
Lindsey T. Mills
1701 Market Street
Philadelphia, PA 19103-2921
steven.reed@morganlewis.com
harvey.bartle@morganlewis.com
rebeccahillyer@morganlewis.com
lindsey.mills@morganlewis.com
Attorneys for Defendants Cephalon, Inc., Teva Pharmaceuticals USA, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc. f/k/a/ Watson Pharma, Inc.

MORGAN, LEWIS & BOCKIUS LLP

Brian M. Ercole
200 S. Biscayne Blvd., Suite 5300
Miami, FL 33131
brian.ercole@morganlewis.com
Attorneys for Defendants Cephalon, Inc., Teva Pharmaceuticals USA, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc. f/k/a/ Watson Pharma, Inc.

NMerkley@Gablelaw.com
AQuinn@Gablelaw.com
*Attorneys for Defendants Cephalon, Inc.,
Teva Pharmaceuticals USA, Inc., Watson
Laboratories, Inc., Actavis LLC, and Actavis
Pharma, Inc. f/k/a/ Watson Pharma, Inc.*

A handwritten signature in black ink, appearing to read "Scott A. Quinn", is written over a horizontal line. The signature is fluid and cursive.

APPLICATION **APPROVED**



OUT OF STATE ATTORNEY REGISTRATION

Michael Tucker Cole, Applicant, respectfully represents:
First Name Middle Name Last Name

1. Applicant is an attorney at law and a member of the law firm of _____

Nelson Mullins Riley & Scarborough LLP

with its principal offices located at 1320 Main Street, Meridian 17th Floor

Columbia, Richland, SC, 29201,
City County State Zip Code
(843) 853-5200, (843) 534-4325, (843) 722-8700,
Telephone (Firm) Telephone (Applicant's Direct Dial) Fax (Applicant)

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

please provide the following: 151 Meeting Street, Suite 600

Charleston, Charleston, SC, 29401,
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>South Carolina</u> | <u>November 14, 1974</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 for the District of South Carolina</u> | <u>January 2, 1975</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, ex rel., Mike Hunter, Attorney General of Oklahoma vs. Purdue Pharma L.P., et al.; Case No.: CJ-2017-816. This is a civil litigation matter pending in the District Court of Cleveland County. Michael Cole seeks admission

to practice in the State of Oklahoma for the purpose of representing a witness,
Burt Rosen, in his deposition.

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., Ste. 100, Oklahoma City, OK, 73102,
Mailing Address City State Zip Code

(405) 235-7700, (405) 239-6651, sandy.coats@crowedunlevy.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 the attached 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.

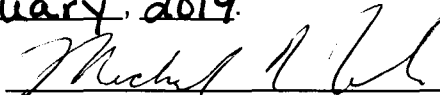
13. Applicant has disclosed in writing to the client that the Applicant is not admitted to practice in this jurisdiction and the client has consented to such representation.

I, Michael T. Cole, 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 30 day of January, 2019.



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 Michael T. Cole

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 Pharma Inc.; and The Purdue Frederick Company Inc. | Sanford C. Coats Joshua D. Burns | 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 Nicholas Merkley | 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 John Sparks | HiPoint Office Building, 2500 McGee Drive Ste. 140, Norman, OK 73072 |
| 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. | Larry D. Ottaway Amy Sherry Fischer | 201 Robert S. Kerr Ave. 12th Floor Oklahoma City, OK 73102 |
| 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 |
| | Jeffrey J. Angelovich Bradley E. Beckworth | 512 N. Broadway Avenue, Suite 200, Oklahoma City, OK 73102 |
| | Glenn Coffee | 915 N. Robinson Ave., Oklahoma City, OK 73102 |

The Supreme Court of South Carolina

Certificate of Good Standing

I, Daniel E. Shearouse, Clerk of the Supreme Court of South Carolina, do hereby certify that Michael Tucker Cole was duly sworn and admitted as an attorney in this state on November 14, 1974, and is currently a regular member of the South Carolina Bar in good standing.

DANIEL E. SHEAROUSE, CLERK

BY  _____
DEPUTY CLERK FOR BAR ADMISSIONS

Columbia, South Carolina

January 29, 2019



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: **February 4, 2019**
3. Application Number: **2019-103**
4. Applying Attorney: **Michael Tucker Cole
Nelson Mullins Riley & Scarborough LLP
151 Meeting Street, Suite 600
Charleston, SC 29401**
5. The Application was: **GRANTED**

Dated this 4th day of February, 2019.



Gina L. Hendryx, General Counsel
Oklahoma Bar Association