

### IN THE DISTRICE COURT OF CLEVELAND COUNTY STATESTAND OF OKLAHOMA

STATE OF OKLAHOMA, ex rel.,	MIKEHUNTER. )	
ATTORNEY GENERAL OF OKL	AHOMA (0 2819 )	
Plaintiff,	office of the	LIAMS
v.	In the office of the In the MARILYN WII	Case No. CJ-2017-816
PURDUE PHARMA L.P., et al.,	)	
Defendants.	)	

#### MOTION TO ASSOCIATE HOPE S. FREIWALD 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 Hope S. Freiwald 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).

DATED: January <u>10</u>, 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 **[0]** day of January, 2019 to:

WHITTEN BURRAGE

Michael Burrage Reggie Whitten

512 N. Broadway Avenue, Suite 300

Oklahoma City, OK 73102

mburrage@whittenburragelaw.com

rwhitten@whittenburragelaw.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-McNeilJanssen Pharmaceuticals, Inc. n/k/a/
Janssen Pharmaceuticals, Inc and OrthoMcNeil-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

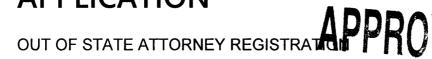
Pharmaceuticals, Inc., Johnson & Johnson, Janssen Pharmaceutica, Inc. n/k/a/ Janssen Pharmaceuticals, Inc., and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a/ Janssen Pharmaceuticals, Inc.

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.

## **APPLICATION**



Hope	S.	Freiwald	, App	licant, respect	fully represents:
First Name	Middle Name	Last Name		·	
1. Applicant is	s an attorney a	t law and a m	nember of	the law firm of	Dechert LLP
with its princip	oal offices loca	ted at			
Cira Centre, 2	2929 Arch Stre	et		<del>-</del>	
Philadelphia City	Phila Coun				, 94-2222
Telephone	00 (Firm)	Telephone (A	pplicant's Dire	ct Dial) Fax (Appli	cant)
hope freiwald E-mail Address (App	@dechert.com	_•			
If Applicant's	office address	is different fr	om above	,	
please provid	e the following	•			
	_		Mailing A	Address	
City		County	,	State Zi	p Code
2. Applican	t is admitted	to practice	and is	a member in	good standing
(statements	attached) of t	he bar(s) of	f the high	nest court(s)	of the following
state(s):					
<u>State</u>				Date of Ad	mission_
New Jersey		,	12/20/1990		
<u>Pennsylvania</u>				12/14/1990	)
				····	

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:

Tribunal	Date of Admission
United States District Court of New Jersey	12/20/1990
Eastern District Court of Pennsylvania	08/14/1991
U.S.C.A. for the Third Circuit	12/27/1994
U.S.C.A. for the Fourth Circuit	08/25/2000
Supreme Court of the United States	05/20/2002
4. Applicant is not currently suspended hereinafter provided (Give particulars; e.	· · · · · · · · · · · · · · · · · · ·
5. Applicant is not currently subject to a any organization with authority to discipl provided (Give particulars; e.g. court, di	ine attorneys at law except as hereinafter
6. Applicant has never received public of suspension or disbarment, by any organ attorneys at law except as hereinafter prediscipline authority, type of discipline, day	ization with authority to discipline ovided (Give particulars; e.g. court,
7. Applicant has never had any certificate before any regulatory or administrative before provided (Give particulars; esuspension or reinstatement): No.	ody suspended or revoked except as
8. Applicant seeks admission to pra	ctice in the State of Oklahoma in the
following matter (give particulars; e.g. o	caption of case, court or agency, type of
matter, party to be represented): Not	e - A separate application is to be
submitted for each matter in which th	e 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 Applicant in this matter is:	member who is counsel of record for
Sanford C.	Coats 18268
First Name Middle Name L	ast Name O.B.A. Number

324 N. Robinson Ave.  Mailing Address	Oklahoma City,		73102 Zip Code	
(405) 235-7700 Telephone Number sandy.coats@crowedunke E-mail Address  10. The following accura and the names and address	itely represents the n	ames o	of each party i	
party:				
Party Name	Counsel Name		Addres	s of Counsel
Please see addendum		<del></del> .		
			TO STATE OF THE ST	- A Birth
11. Applicant certifies tha	nt he/she shall be subj	ect to t	he jurisdiction	of the courts
and disciplinary boards	of this state with re	espect	to the laws	of this state
governing the conduct o	f attorneys to the sa	ame ex	tent as a me	mber of the
Oklahoma Bar Association	n.			
12. Applicant understand	ds and shall comply v	with the	standards of	professional
conduct required of memb	pers of the Oklahoma	Bar As	sociation.	
13. Applicant has disclo	osed in writing to the	e client	t that the App	olicant is not

admitted to practice in this jurisdiction and the client has consented to such

representation.

I, <u>Hope S. Freiwald</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 28 day of December , 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 100B

#### ADDENDUM to the Out of State Attorney Registration Application of <u>Hope S.</u>

#### **Freiwald**

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	Sanford C. Coats	324 N. Robinson Ave. Ste.
Pharma Inc.;. and The Purdue	Joshua D. Burns	100, Oklahoma City, OK
Frederick Company Inc.		73102
Cephalon, Inc.; Teva	Robert G. McCampbell	One Leadership Square,
Pharmaceuticals USA, Inc.;	Nicholas Merkley	15th Fl., 211 North
Watson Laboratories, Inc.;		Robinson, Oklahoma
Actavis LLC; and Actavis		City, OK 73102-7255
Pharma, Inc. f/k/a Watson		
Pharma, Inc.		
Janssen Pharmaceuticals, Inc.;	Benjamin H. Odom	HiPoint Office Building,
Johnson & Johnson; Janssen	John Sparks	2500 McGee Drive Ste.
Phannaceutica, Inc. n/k/a		140, Oklahoma City,
Janssen Pharmaceuticals, Inc.;		OK 73072
and Ortho-McNeilanssen		
Pharmaceuticals, Inc. n/k/a		
Janssen Pharmaceuticals, Inc.		
Janssen Pharmaceuticals, Inc.;	Larry D. Ottaway	201 Robert S. Kerr Ave.
Johnson & Johnson; Janssen	Amy Sherry Fischer	12th Floor
Phannaceutica, Inc. n/k/a		Oklahoma City, OK
Janssen Pharmaceuticals, Inc.;		73102
and Ortho-McNeilanssen		
Pharmaceuticals, Inc. n/k/a		
Janssen Pharmaceuticals, Inc.		

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 731 02
	Glenn Coffee	915 N. Robinson Ave., Oklahoma City, OK 73 102

,

# Supreme Court of New Jersey



# Certificate of Good Standing

This is to certify that HOPE MORRISON FREIWALD

(No. 023111990 ) was constituted and appointed an Attorney at Law of New

Jersey on

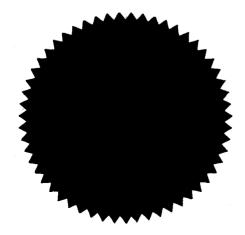
**December 20, 1990** 

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

2ND day of January , 20

Clerk of the Supreme Court



Supreme Court of Pennsylvania

### **CERTIFICATE OF GOOD STANDING**

Hope Morrison Freiwald, Esq.

DATE OF ADMISSION

December 14, 1990

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: January 4, 2019

Patricia A. Johnson Chief Clerk



## 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: January 8, 2019
- 3. Application Number: 2019-11
- 4. Applying Attorney: Hope S. Freiwald

Dechert LLP 2929 Arch Street

Philadelphia, PA 19104

5. The Application was: **GRANTED** 

Dated this 9th day of January, 2019.



Gina L. Hendryx, General Counsel Oklahoma Bar Association