



IN THE DISTRICT COURT OF CLEVELAND COUNTY

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

Plaintiff,

v.

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

Defendants. )

STATE OF OKLAHOMA  
CLEVELAND COUNTY  
FILED

MAR 04 2019

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

**MOTION TO ASSOCIATE ALAN DABDOUB 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 Alan Dabdoub 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: March 4, 2019.

Respectfully submitted,

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**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 4 day of March, 2019 to:

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Janssen Pharmaceuticals, Inc. n/k/a/*

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

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*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.*

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

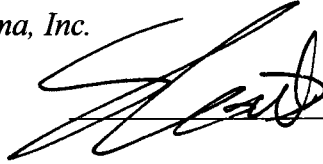
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AQuinn@Gablelaw.com

*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 be "A. Quinn", is written over a horizontal line that extends across the page.

# APPLICATION

# APPROVED



## OUT OF STATE ATTORNEY REGISTRATION

Alan Dabdoub, Applicant, respectfully represents:  
First Name Middle Name Last Name

1. Applicant is an attorney at law and a member of the law firm of Lynn Pinker Cox & Hurst, LLP ("LPCH")

with its principal offices located at 2100 Ross Avenue, Suite 2700

Dallas, Dallas, TX, 75201  
City County State Zip Code  
(214) 981-3800, (214) 981-3814, (214) 981-3839  
Telephone (Firm) Telephone (Applicant's Direct Dial) Fax (Applicant)

adabdoub@lynnllp.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, 2006</u>
<u>Louisiana</u>	<u>October 10, 1997</u>
<u>Tennessee</u>	<u>September 19, 2005</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:

Tribunal

Date of Admission

United States District Court for the Northern District of Texas	November 30, 2010
United States District Court for the Eastern District of Texas	July 20, 2010
United States District Court for the Southern District of Texas	November 29, 2012
United States District Court for the Western District of Texas	July 22, 2011
United States Fifth Circuit Court of Appeals	March 22, 2004

4. Have you ever been suspended or disbarred in any court except as hereinafter provided (Give particulars; e.g. court, jurisdiction, date): Brief administrative suspension on Sept. 1, 2006 (Tennessee) for CLE requirement. I was not residing in nor practicing law in Tennessee at that time. Once I became aware, I fulfilled the requirement and was reinstated in Tennessee, where I am currently in good standing. See attached letter.

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. (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.:**  
**Case No. CJ-2017-816, in the District Court of Cleveland County, State of Oklahoma; This is a fraud and consumer protection action. LPCH seeks to represent (1) Purdue Pharma, L.P., (2) Purdue Pharma, Inc., and (3) The Purdue Frederick Company.**

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

<u>Sanford</u>	<u>C.</u>	<u>Coats</u>	<u>18268</u>
First Name	Middle Name	Last Name	O.B.A. Number

<u>324 N. Robinson Avenue, Suite 100,</u>	<u>Oklahoma City,</u>	<u>OK</u> ,	<u>73102</u>
Mailing Address	City	State	Zip Code

<u>(405) 235-7700</u>	<u>(405) 239-6651</u>	<u>sandy.coats@crowedunlevy.com</u>
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(S)	COUNSEL NAME(S)	ADDRESS OF COUNSEL
Purdue Pharma L.P. Purdue Pharma Inc. The Purdue Frederick Company Inc.	Sanford C. Coats Joshua D. Burns	324 N. Robinson Avenue, Suite 100 Oklahoma City, OK 73102
Teva Pharmaceuticals USA, Inc. Cephalon, Inc. Watson Laboratories, Inc. Actavis LLC Actavis Pharma, Inc. f/k/a Watson Pharma, Inc.	Robert G. McCampbell Nicholas Merkley	One Leadership Square 15th Floor, 211 North Robinson Oklahoma City, OK 73102-7255
Johnson & Johnson Janssen Pharmaceuticals, Inc. Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc. Janssen Phannaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc.	Benjamin H. Odom John Sparks	HiPoint Office Building 2500 McGee Drive Suite 140 Oklahoma City, OK 73072
Johnson & Johnson Janssen Pharmaceuticals, Inc. Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc. Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc.	Larry D. Ottaway Amy Sherry Fischer	201 Robert S. Kerr Avenue 12 <sup>th</sup> 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
	Bradley E. Beckworth Jeffrey J. Angelovich	512 N. Broadway Avenue Suite 200 Oklahoma City, OK 73102
	Glenn Coffee	915 N. Robinson Avenue Oklahoma City, OK 73102

11. Applicant certifies that he 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.

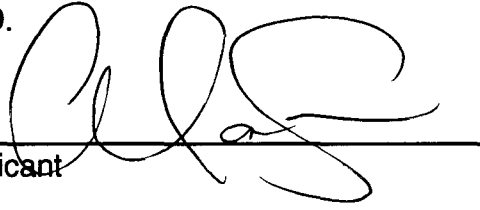
I, Alan Dabdoub, do hereby swear/affirm under penalty of perjury that the assertions of this application are true:

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 27th day of February, 2019.

Applicant

A handwritten signature in black ink, consisting of several large, stylized loops and curves, positioned above a horizontal line.

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

# 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

**Alan Dabdoub**

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 14th day of December, 2006.

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

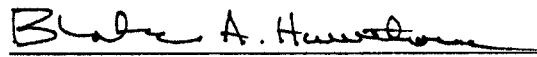
**Alan Dabdoub**

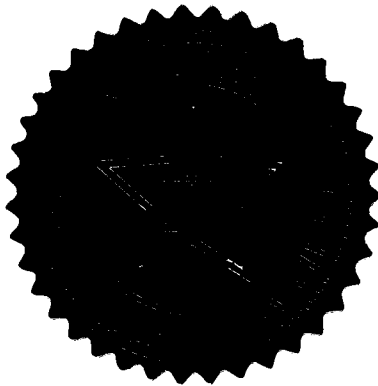
is presently enrolled with the State Bar of Texas as an active member in good standing.

**IN TESTIMONY WHEREOF** witness my signature

and the seal of the Supreme Court of Texas at the City of Austin, this, the 19th day of February, 2019.

BLAKE HAWTHORNE, Clerk

  
Clerk, Supreme Court of Texas



No. 3100C.1

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

**Exhibit B**

**Louisiana State Bar Association**

The Louisiana State Bar Association hereby certifies that \_\_\_\_\_

\_\_\_\_\_ Mr. Alan Dabdoub

\_\_\_\_\_ 6717 Vanderbilt Ave

whose address is \_\_\_\_\_

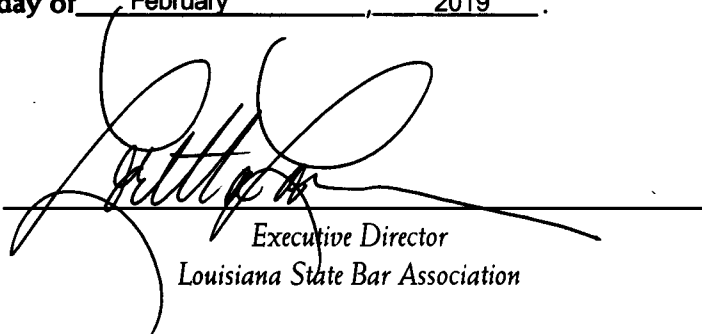
\_\_\_\_\_ Dallas, TX 75214

is a member in good standing of the Louisiana State Bar Association as of this date, and that said person was duly admitted to practice in the courts of the State of Louisiana on the

\_\_\_\_\_ 10th \_\_\_\_\_ day of \_\_\_\_\_ October \_\_\_\_\_, \_\_\_\_\_ 1997 \_\_\_\_\_.

Given over my hand and the Seal of the Louisiana State Bar Association, this \_\_\_\_\_ 18th \_\_\_\_\_

day of \_\_\_\_\_ February \_\_\_\_\_, \_\_\_\_\_ 2019 \_\_\_\_\_.

  
\_\_\_\_\_  
Executive Director  
Louisiana State Bar Association



**BOARD OF PROFESSIONAL RESPONSIBILITY**  
of the  
**SUPREME COURT OF TENNESSEE**

SANDY L. GARRETT  
CHIEF DISCIPLINARY COUNSEL  
KRISANN HODGES  
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GERALD D. MORGAN  
M. PRESTON SHIPP  
EILEEN BURKHALTER SMITH  
A. RUSSELL WILLIS  
DISCIPLINARY COUNSEL

February 20, 2019

TO WHOM IT MAY CONCERN:

Re: Alan Dabdoub  
BPR No. 024275

On December 18, 1975, the Tennessee Supreme Court established the Board of Professional Responsibility of the Supreme Court of Tennessee to supervise the conduct of attorneys licensed to practice law in this state.

This letter is to certify that on September 19, 2005, Alan Dabdoub was issued a license to practice law in the State of Tennessee. On July 24, 2012, Mr. Dabdoub requested and received an exempt status pursuant to Tenn. Sup. Ct. R. 9, § 10.3.

As of the date of this letter, Mr. Dabdoub's license status is listed as *inactive-not practicing in Tennessee* and is considered in good standing.

Sincerely,

A handwritten signature in cursive script that reads "Mary McKnight".

Mary McKnight  
Registration Manager

MLM/lw



## Certificate of Compliance

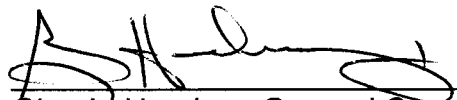
Oklahoma Bar Association  
1901 North Lincoln Boulevard  
Post Office Box 53036  
Oklahoma City, Oklahoma 73152-3036

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 28, 2019**
3. Application Number: **2019-159**
4. Applying Attorney: **Alan Dabdoub**  
**Lynn Pinker Cox & Hurst, LLP**  
**2100 Ross Avenue, Suite 2700**  
**Dallas, TX 75201**
5. The Application was: **GRANTED**

Dated this 28th day of February, 2019.



  
Gina L. Hendryx, General Counsel  
Oklahoma Bar Association