



IN THE DISTRICT COURT OF CLEVELAND COUNTY  
STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel.,  
MIKE HUNTER,  
ATTORNEY GENERAL OF OKLAHOMA,  
  
Plaintiff,

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.,

Defendants.

STATE OF OKLAHOMA }  
CLEVELAND COUNTY } S.S.

FILED

MAR 14 2019

In the office of the  
Court Clerk MARILYN WILLIAMS

Case No. CJ-2017-816  
Honorable Thad Balkman

William C. Hetherington  
Special Discovery Master

**TO BE HEARD BY WILLIAM C.  
HETHERINGTON, SPECIAL  
DISCOVERY MASTER**

**PURDUE'S JOINDER TO JANSSEN DEFENDANTS'  
EMERGENCY MOTION FOR ORDER TO SHOW CAUSE**

Purdue Pharma, L.P., Purdue Pharma, Inc., and The Purdue Frederick Company (collectively "Purdue") respectfully submit this Joinder to the Emergency Motion for Order to Show Cause filed by Defendants Johnson & Johnson, Inc., Janssen Pharmaceuticals, Inc., Ortho-McNeil-Janssen Pharmaceuticals, Inc., and Janssen Pharmaceutica, Inc. (collectively "Janssen") on March 12, 2019.

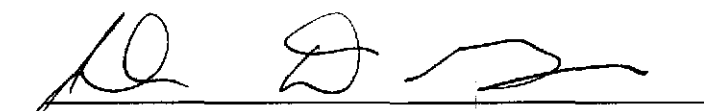
On February 18, 2019, the Discovery Master issued a Discovery Order, ruling on Defendants' February 12, 2019 Emergency Motion to Compel. The State was ordered to produce identified data in "cross-walked form" to Defendants, including Purdue, no later than March 1, 2019. As Janssen explains in its motion, the State repeatedly represented that it would provide this data in a usable form so that Defendants can identify specific individuals across the State's databases. In brief, as Janssen explains in its motion, the State has not complied with the February 18 Order, by failing to produce the data identified in the Order in a usable, fully "cross-walked form," now more than 10 days after the deadline.

Accordingly, Janssen has moved for an Order to Show Cause regarding this failure to comply with the February 18 Order. Because the arguments and reasoning set forth by Janssen in its motion apply equally here to the State's failure to produce the data in a usable form to Purdue, Purdue joins Janssen's motion and incorporates by reference the points and authorities set forth therein. The Discovery Master should order the State to show cause as to why its failure to comply with the Order should not preclude the State from pursuing related allegations at trial, including any allegation that Purdue opioid prescriptions led to deaths from overdose or abuse.

For these reasons, and the reasons set forth in Janssen's Motion for Order to Show Cause, Purdue respectfully requests that the Discovery Master order the State to show cause why appropriate evidentiary preclusions should not be imposed based on the State's failure to comply with the Discovery Master's February 18, 2019 Order or otherwise provide relevant discovery in its sole possession, custody and control.

Dated: March 14, 2019.

Respectfully submitted,

  
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## CERTIFICATE OF MAILING

This is to certify on March 14, 2019, a true and correct copy of the above and foregoing has been served via e-mail to the following:

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