

STATE (CLEVELAND COUNTY) U.S.
* 1043322360 *
FILED In The
Office of the Court Clerk



**IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA**

APR 22 2019

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

Plaintiff,

In the office of the
Court Clerk **MARILYN WILLIAMS**

**For Judge Balkman's
Consideration**

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.

Case No. CJ-2017-816
Honorable Thad Balkman

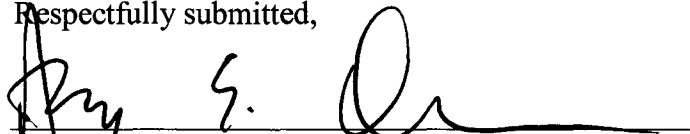
William C. Hetherington
Special Discovery Master

**MOTION OF DEFENDANTS WATSON LABORATORIES, INC., ACTAVIS LLC,
ACTAVIS PHARMA, INC., CEPHALON, INC., AND TEVA PHARMACEUTICALS
USA, INC. TO EXCLUDE EXPERT TESTIMONY OF DR. ANDREW KOLODNY**

The Teva and Actavis Defendants hereby adopt and reassert “Defendants Janssen Pharmaceuticals and Johnson & Johnson’s Motion to Exclude Expert Testimony of Dr. Andrew Kolodny and Brief in Support” filed by the Janssen Defendants on April 16, 2019. The Teva and Actavis Defendants adopt the motion and brief in support, in its entirety with the exception of Section III.B, which deals with issues unique to the Janssen Pharmaceuticals and Johnson & Johnson. As put forth in Sections I through III.A, Dr. Kolodny’s opinions should be excluded because: Dr. Kolodny has no expertise in this area; his testimony will not assist the fact-finder; and he does not employ an accepted methodology, making his opinions unreliable.

Dated: April 22, 2019

Respectfully submitted,



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CERTIFICATE OF SERVICE

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