

STATE OF CLEVELAND COUNTY } S.S.
FILED In The
Office of the Court Clerk



MAY 03 2019

IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

In the office of the
Court Clerk MARILYN WILLIAMS

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

Plaintiff,

v.

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

Defendants.

Case No. CJ-2017-816

Judge Thad Balkman

William C. Hetherington
Special Discovery Master

**DEFENDANTS JANSSEN PHARMACEUTICALS, INC.
AND JOHNSON & JOHNSON'S MOTION *IN LIMINE* NO. 5 TO EXCLUDE
INSINUATIONS ABOUT MARKETING TO CHILDREN**

REDACTED VERSION

THIS DOCUMENT WAS FILED IN ITS ENTIRETY APRIL 26, 2019,
UNDER SEAL
PER COURT ORDER DATED APRIL 16, 2018

Defendants Janssen Pharmaceuticals, Inc. (“Janssen”)¹ and Johnson & Johnson (“J&J”) hereby move this Court for an order excluding from trial (1) any statements alleging or implying that J&J and Janssen marketed opioid medications to children and (2) any evidence regarding pain education for children. First, statements alleging or implying that J&J or Janssen marketed opioid medications to children deliberately mischaracterize the evidence. J&J and Janssen never marketed any opioid medications to children. Such statements (and evidence about pain medication for children) should be excluded from the trial. *See* 12 O.S. §§ 2401, 2402, 2403. Janssen and J&J respectfully request that the Court grant their Motion *in Limine* and such other relief as the Court deems just and proper.

BRIEF IN SUPPORT

In support of this Motion *in Limine*, Janssen and J&J show the following:

I. INTRODUCTION

[REDACTED]

[REDACTED]

[REDACTED]

These statements are false. The Court should not allow the State to present these inflammatory mischaracterizations of the evidence or the pain education documents that they are based on. The State has no basis to connect the pain education documents to the marketing or sale of even a single opioid prescription. These statements and documents thus serve *no* purpose other than to paint Janssen and J&J as corporate villains—using the tobacco playbook to market addictive products to children. And this Court’s

¹ “Janssen” also refers to Janssen Pharmaceuticals, Inc.’s predecessors, Ortho-McNeil-Janssen Pharmaceuticals, Inc. and Janssen Pharmaceutica, Inc.

decision to allow cameras in the courtroom risks broadcasting that false and unfair picture to the public, including hundreds of thousands of potential jurors in *other* matters. If the Court allows the State to wildly accuse J&J and Janssen of marketing opioid medications to children with no basis in fact, these false claims will taint every subsequent opioids-related trial. The Court should issue an order excluding statements alleging or implying that Janssen marketed opioid medications to children and evidence regarding children's pain education.

II. ARGUMENT

[REDACTED]

[REDACTED]

[REDACTED]

The State also introduced two exhibits from Growing Pains, a website sponsored by Janssen and others that educated adolescents about chronic pain. Ex. F, Growing Pains Website 1; Ex. G, Growing Pains Website 2; Ex. A, Deem-Eshleman Dep. at 254:5-19, 263:11-25. The Growing Pains exhibits do not mention opioids and instead teach adolescents how to deal with chronic pain, for example noting that “Chronic pain is NOT ... a label that says you are ‘defective’” and that “you are entitled to all of the emotions - both good and bad - associated with your pain.” Ex. F, Growing Pains Website 1; Ex. G, Growing Pains Website 2.

Not one of the State’s exhibits about youth education encourages children to use opioid medications. Janssen and J&J never made, authorized, or sponsored any such message.

But instead of sticking to the evidence, the State has made a series of false and inflammatory remarks intended to smear J&J and Janssen’s reputations:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

These statements, all of them, amount to either outright lies or deliberate mischaracterizations of the evidence—mischaracterizations that are designed to shock and inflame and that have no

bearing on the allegations of misleading marketing at the heart of this case. The Court should not allow these incendiary misstatements or admit the documents they mischaracterize at trial.

Pain education for children and false claims that J&J and Janssen marketed opioid medications to children are irrelevant. Documents about pain education for children and the State's false claims that J&J and Janssen marketed opioid medications to children are not material to the State's case. Under Oklahoma law, evidence is admissible only if it is "relevant"—if it "tend[s] to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence." 12 O.S. §§ 2401, 2402. There is no evidence the ITPPC's plans regarding pain education for children (with no reference to opioids) were implemented in Oklahoma (or anywhere). The Growing Pains website has no connection to the marketing of Nucynta and tells adolescents suffering from chronic pain, for example, that they are not "defective"—a message that should be uncontroversial. Since it doesn't mention or market opioids, this evidence has no bearing on whether J&J and Janssen engaged in the misleading marketing of opioid medications. And there is no basis to connect these documents to the marketing, sales, or prescriptions of opioids. The State's suggestion otherwise is an overreach based not on facts but deliberate mischaracterization of documents. *See Miller v. Holzmann*, 240 F.R.D. 1, 4 (D.D.C. 2006) ("A mischaracterization of the contents of a document is an irrelevant waste of time, unless there is some significance to that mischaracterization in itself . . .").

Statements that Janssen marketed opioid medications to children are unduly prejudicial. The State's attempt to insinuate that Janssen sought a profit by hooking children on addictive medicines is not only false, but inflammatory and prejudicial—they are unduly prejudicial by design. And because it adds nothing to the State's case, its "probative value is substantially

outweighed by the danger of unfair prejudice.” See 12 O.S. § 2403; *Hain v. State*, 1996 OK CR 26, 919 P.2d 1130, 1143 (evidence that “tends to elicit an emotional rather than rational judgment” is unfairly prejudicial and should therefore be excluded).

Though some courts hold that exclusion for prejudice is unnecessary in bench trials, see, e.g., *United States v. Kienlen*, 349 F. App’x 349, 351 (10th Cir. 2009), those decisions have little application here where the concern is not about the judge in this case but about exposing prejudicial disinformation to millions of Americans, including countless prospective jurors in hundreds of matters pending against Janssen and J&J across the country. The Court’s decision to allow cameras in the courtroom means that prejudice from any inflammatory rhetoric allowed here will infect each and every subsequent opioids-related trial. The Court should therefore bar any such evidence. See *State v. Miller*, 165 A.2d 829, 831 (N.J. App. Div. 1960) (“Even in a trial without jury, a defendant should not be required to contend with inadmissible evidence, where it appears that it may have a prejudicial effect.”).

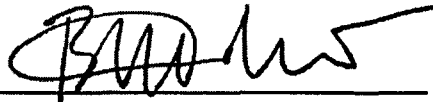
The topic of marketing opioids to children would waste time at trial. The Court should also exclude these prejudicial statements and irrelevant documents because they would cause undue delay—wasting the Court’s time and resources with false and irrelevant allegations that Janssen and J&J will have to address and rebut. 12 O.S. § 2403. *Glaros v. H.H. Robertson*, 797 F.2d 1564, 1573 (Fed. Cir. 1986) (excluding evidence where admission “would have injected frolics and detours and ... required introduction of counter-evidence, all likely to create side issues”); *Walls v. Shelby*, No. 5:11-cv-174-KGB, 2012 WL 6569775, at *3 (E.D. Ark. Dec. 17, 2012) (excluding evidence because if admitted “the Court necessarily would be required to permit [the other party] to put into context, explain, or rebut [the evidence][,] . . . result[ing] in a danger of undue delay and wasting time”).

III. CONCLUSION

For all these reasons, the Court should grant Janssen and J&J's Motion *in Limine* and issue an order excluding from trial (1) any statements alleging or implying that J&J and Janssen marketed opioid medications to children and (2) any evidence regarding pain disease-state education for children.

Dated: April 26, 2019

Respectfully submitted,

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CERTIFICATE OF MAILING

Pursuant to Okla. Stat. tit. 12, § 2005(D), and by agreement of the parties, this is to certify on April 26, 2019, a true and correct copy of the above and foregoing has been served via electronic mail, to the following:

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EXHIBIT A

[FILED UNDER SEAL]

1 IN THE DISTRICT COURT OF CLEVELAND COUNTY

2 STATE OF OKLAHOMA

3 STATE OF OKLAHOMA, ex rel.,
4 MIKE HUNTER,
5 ATTORNEY GENERAL OF OKLAHOMA,

6 Plaintiff,

7 vs. Case No. CJ-2017-816

- 8 (1) PURDUE PHARMA, L.P.;
9 (2) PURDUE PHARMA, INC.;
10 (3) THE PURDUE FREDERICK COMPANY;
11 (4) TEVA PHARMACEUTICALS USA, INC.;
12 (5) CEPHALON, INC.;
13 (6) JOHNSON & JOHNSON;
14 (7) JANSSEN PHARMACEUTICALS, INC.;
15 (8) ORTHO-McNEIL-JANSSEN
16 PHARMACEUTICALS, INC., n/k/a
17 JANSSEN PHARMACEUTICALS, INC.;
18 (9) JANSSEN PHARMACEUTICA, INC.;
19 N/k/a JANSSEN PHARMACEUTICALS, INC.;
20 (10) ALLERGAN, PLC, f/k/a ACTAVIS PLC,
21 f/k/a ACTAVIS, INC., f/k/a WATSON
22 PHARMACEUTICALS, INC.;
23 (11) WATSON LABORATORIES, INC.;
24 (12) ACTAVIS, LLC; and
25 (13) ACTAVIS PHARMA, INC.,
f/k/a WATSON PHARMA, INC.,

Defendants.

VIDEOTAPED DEPOSITION OF JOHNSON & JOHNSON

3230(c)(5) WITNESS KIMBERLY DEEM-ESHLEMAN, VOL. I

TAKEN ON BEHALF OF THE PLAINTIFF

ON FEBRUARY 5, 2019, BEGINNING AT 8:59 A.M.

IN OKLAHOMA CITY, OKLAHOMA

VIDEOTAPED BY: Gabriel Pack

REPORTED BY: D. Luke Epps, CSR, RPR

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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14

(Exhibit 9 marked for identification.)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 MR. ALLAN: To be clear, you're reading
2 from a document containing the metadata associated
3 with the document.

[REDACTED]

22 (Exhibit 10 marked for identification.)

[REDACTED]

[REDACTED]

1 Q And you also are here to talk about
2 unbranded marketing?

3 A Yes.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 A Yes.

2 Q Okay. Now, Growing Pains is a website
3 that still exists today, isn't it?

4 A I was not aware of that, no.

5 Q Well, it is, and we had the luxury last
6 night of pulling down some screenshots from it.
7 I'll hand you Exhibit 13. We'll go through a few of
8 these. Exhibit 13 is a page that I pulled down from
9 this Growing Pains website. You'll see on the top
10 right-hand corner, this happened at 3:43 p.m. on
11 February 4th this year --

12 (Exhibit 13 marked for identification.)

13 A I see it.

14 Q -- which was yesterday, and here it says
15 "Growing Pains." Do you see that at the top?

16 A Yes.

17 Q And it says "For Adolescents Living with
18 Pain"?

19 A Yes.

20 Q Now, we're going to come back to that
21 page, but if you'll turn to the second page, it says
22 the website is funded by two entities. Do you see
23 that?

24 A I do.

25 Q One of those entities is who?

1 A Janssen.

2 Q That's you; right?

3 A Yes.

4 Q Okay. Let's turn back to the first page.

5 This says "Accept the Pain. Accept that pain is a
6 part of your life. Accepting it doesn't mean you
7 'threw in the towel.' It means you are realistic
8 about what your situation is and you are willing to
9 work toward a better," some of it is cut off, "of
10 life.' Do you see that?

11 A I do.

12 Q Below it, it says "What is chronic pain?"
13 Do you see that?

14 A I do.

15 Q And it answers, doesn't it?

16 A Yes.

17 Q "Chronic pain is any pain that lasts
18 longer than three months"; right?

19 A Yes.

20 Q "Pain that does not respond to
21 conventional medical treatments"; right?

22 A Correct.

23 Q "Pain that is invisible and cannot be
24 measured"; right?

25 A It says that, yes.

[REDACTED]

21 Q (BY MR. BECKWORTH) Well, it's got

22 Partners Against Pain on it.

23 A Which I wasn't familiar with.

24 Q It was trademarked by Purdue?

25 A And I was not familiar with that.

[REDACTED]

11 Q Okay. All right. Let's look at the next
12 one, Exhibit 14. It's another page from -- sorry.
13 Exhibit 14 is another page from this website. This
14 page, again, "Growing Pains, Adolescents Living with
15 Pain," this one, it says "Know Your Emotions,
16 Communicating to Others," and on there it lists
17 "Health Care Providers." Do you see that up at the
18 top of the tree?

19 (Exhibit 14 marked for identification.)

20 A Yes.

21 Q It says "It doesn't matter if other people
22 can't see your pain. You know it's real and you are
23 entitled to all the emotions - both good and bad -
24 associated with your pain"; right?

25 A It says that here, yes.

1 Q It goes on to say several other things,
2 and then at the bottom, it says -- or about halfway,
3 it says "Visit 'Know Your Rights - Be Treated With
4 Respect.'" Do you see that?

5 A I see that, yes.

6 Q Okay. Now, let's turn to the second page.
7 Do you see the Janssen logo again?

8 A I do.

9 Q And it says the "website funded by," and
10 it says "Janssen"; right?

11 A Yes.

12 Q Right?

13 A Yes. It does, yes.

14 Q Okay. Now, let's look at the next one.

15 THE WITNESS: Bless you.

16 MR. BURNS: Thanks.

17 Q (BY MR. BECKWORTH) Let's look at Exhibit
18 15. Again, this is Exhibit 15, we pulled down on
19 February 4, 2019, from Growing Pains website. And
20 this one says "Communicating to Others." Do you see
21 that?

22 (Exhibit 15 marked for identification.)

23 A I do.

24 Q And under that banner, it says "Pain
25 doesn't only affect your body. It also affects your

[REDACTED]

[REDACTED]

[Redacted text block containing approximately 25 lines of blacked-out information]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 (Exhibit 18 marked for identification.)

14 MR. ALLAN: Do you have an extra copy?

15 MR. BECKWORTH: I'm sorry. I thought I
16 gave you a bunch.

17 MR. ALLAN: Thank you.

18 Q (BY MR. BECKWORTH) Let's move through
19 this quickly. Exhibit 18 says "Know Your Rights."

20 A I see that, yes.

21 Q And it says "Exercise Your Right. Ask for
22 what you want." Do you see that?

23 A I see that, yes.

24 Q And it says "Having the right to ask for
25 what you want and actually asking for it are two

[REDACTED]

6 Q Prescription drugs?

7 A Correct.

8 Q Prescription?

9 A Yes.

[REDACTED]

20 Q Well, Growing Pains said it. Your success
21 to -- keys to success said it. Fill the need that
22 you create, build the need, whatever you want to
23 call it.

24 MR. ALLAN: Objection to form.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 Q Well, I'll hand you Exhibit 23.

2 MR. ALLAN: Object to the use of this
3 document as beyond the scope and having nothing to
4 do with J&J.

5 Q (BY MR. BECKWORTH) To the extent I can, I
6 overrule that. We'll have to have that out with the
7 Court at some point. Ma'am, Exhibit 23 is a letter
8 and an attachment of a document that we found online
9 at a repository for tobacco industry documents. Do
10 you see this?

11 (Exhibit 23 marked for identification.)

12 A I see this -- what you've put in front of
13 me.

14 Q And on the top, there's a November 8,
15 1963, letter from an advertising firm, Lennen &
16 Newell, to the vice president of Lorillard Company.
17 Do you see that?

18 A I see that.

19 Q And he says "Dear Manny: There's nothing
20 like starting them out young!"; correct?

21 A It says that, yes.

22 Q "'Ritchie' is a wonderful little guy and,
23 while he doesn't smoke, he tells me he talks up
24 Newports all the time." Do you see that?

25 A I see that.

1 Q And then there's an attachment, and on the
2 back, there is a photograph of a young man between
3 an older man and woman holding a pack of cigarettes
4 to which he appears to be grabbing a cigarette;
5 correct?

6 A I can't really tell, but I can assume.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12 Q And you know that with respect to tobacco
13 companies, they used PR firms and advertising firms
14 to target to children?

15 MR. ALLAN: Object to form and beyond the
16 scope.

17 THE WITNESS: And I have no expertise on
18 what tobacco companies did.

19 Q (BY MR. BECKWORTH) You know that for many
20 years -- well, you're not here as an expert. You're
21 here as a witness. You know that for many years
22 tobacco companies operated with this campaign that
23 cigarettes were not harmful or addictive?

24 MR. ALLAN: Objection. Beyond the scope.
25 Object to form.

1 THE WITNESS: Again, I have no intel as
2 far as what the tobacco companies did.

3 Q (BY MR. BECKWORTH) And you know that
4 tobacco companies marketed to children because they
5 wanted to have a ground roots effort to have kids
6 come up in the supply chain so that as older smokers
7 died, we'd have new ones coming to market to
8 continue and expand the marketplace?

9 MR. ALLAN: Object to form and beyond the
10 scope.

11 THE WITNESS: Again, I have no knowledge
12 of that.

13 Q (BY MR. BECKWORTH) Okay. Well, I'm going
14 to hand you a document we'll mark as Exhibit 24.
15 This is from the Campaign for Tobacco-Free Kids, and
16 on the front of it, there's a quote from the United
17 States District Court judgment or final opinion in
18 the Department of Justice's tobacco case, United
19 States vs. Philip Morris. At the very top, it says
20 "From the 1950s to the present, different
21 defendants, at different times, and using different
22 methods, have intentionally marketed to young people
23 under the age of twenty-one in order to recruit
24 'replacement smokers' to ensure the economic future
25 of the tobacco industry." Do you see that?

1 (Exhibit 24 marked for identification.)

2 A I do.

3 MR. ALLAN: Object to the use of this
4 document as beyond the scope and having nothing to
5 do with the issues in this litigation or J&J.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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CERTIFICATE

I, D. Luke Epps, Certified Shorthand Reporter, do hereby certify that the above-named Kimberly Deem-Eshleman was by me first duly sworn to testify the truth, the whole truth, and nothing but the truth, in the case aforesaid; that the above and foregoing deposition was by me taken in shorthand and thereafter transcribed; and that I am not an attorney for nor relative of any of said parties or otherwise interested in the event of said action.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal this 11th day of February, 2019.



D. Luke Epps, CSR, RPR

EXHIBIT B

[FILED UNDER SEAL]

EXHIBIT C

[FILED UNDER SEAL]

EXHIBIT D

[FILED UNDER SEAL]

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IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

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

Plaintiff,
No. CJ-2017-816

vs.

- (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.

-----x

Videotaped deposition of ROBYN KOHN, taken
pursuant to Notice, was held at the Offices of REGUS,
999 Riverview Drive, Totowa, New Jersey, commencing
February 22, 2019, 8:16 a.m., on the above date, before
Amanda McCredo, a Court Reporter and Notary Public in the
State of New Jersey.

[REDACTED]

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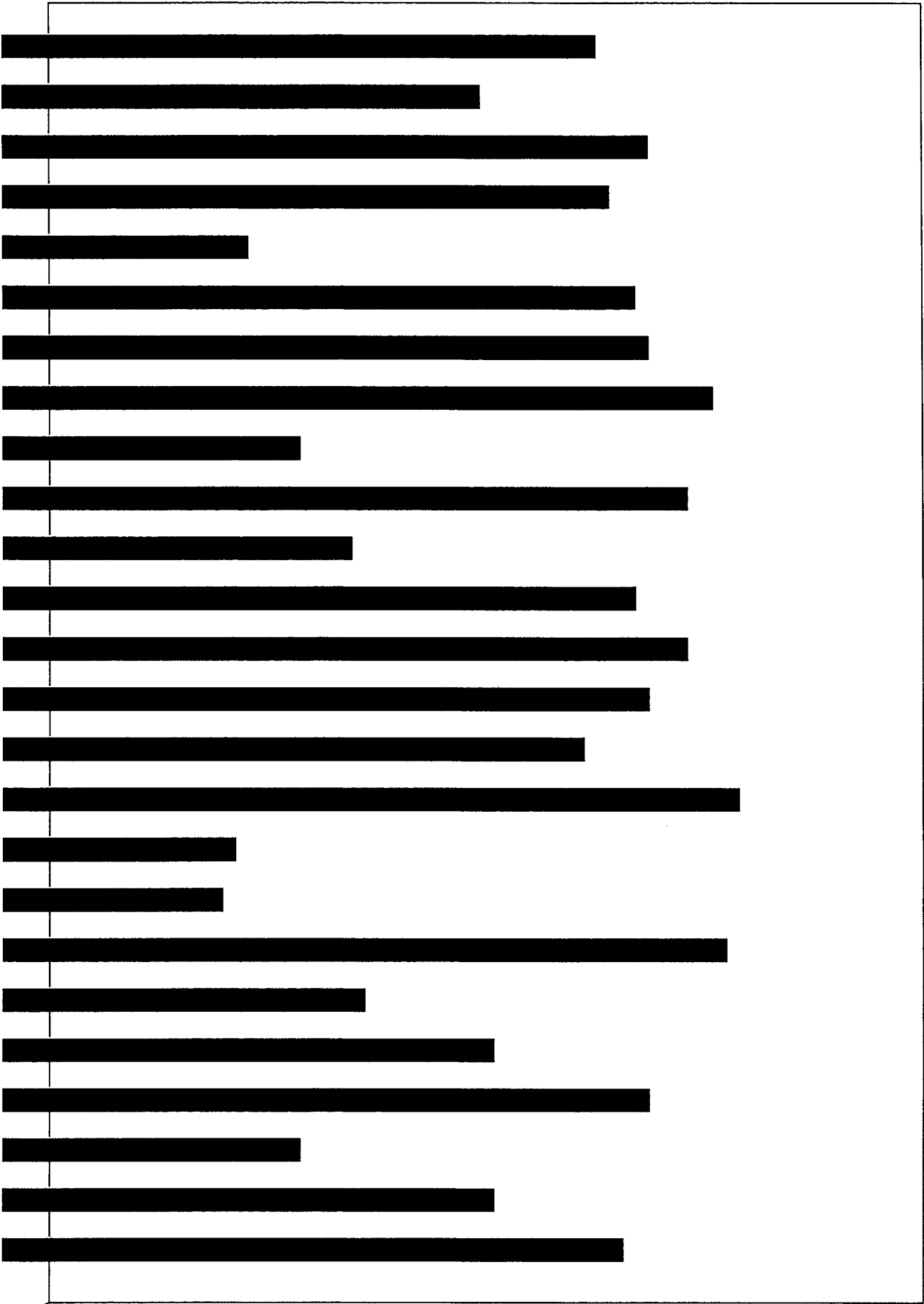
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C E R T I F I C A T E

I, AMANDA McCREDO, a Shorthand Reporter
and Notary Public of the State of New Jersey,
do hereby certify:

That the witness whose examination is
hereinbefore set forth, was duly sworn, and
that such examination is a true record of the
testimony given by such witness.

I further certify that I am not related to any
of the parties to this action by blood or
marriage; and that I am in no way interested in
the outcome of this matter.



AMANDA McCREDO

EXHIBIT E

[FILED UNDER SEAL]

EXHIBIT F

For Adolescents Living with Pain

For Parents

View Demo

Login

Register



How do you feel today?

Enter a word or phrase

Accept the Pain

Take Control

Home Accept the Pain

Accept the Pain

Accept that pain is part of your life. Accepting it doesn't mean you "threw in the towel." It means you are realistic about what your situation is - and you are willing to work toward a better life.

What is Chronic Pain? Chronic pain is

- ... any pain that lasts longer than three months.
- ... pain that does not respond to conventional medical treatments.
- ... pain that is invisible and cannot be measured.

Chronic pain is NOT

- ... your entire identity.
- ... a label that says you are "defective"
- ... a reason to withdraw from people and activities you enjoy.

You Are Not Alone

Number of people who live with chronic pain	1 out of 3*
**Of those with pain:	
Percentage of people who said pain is so intense they can't function	33%
Percentage of people who said they were uncomfortable discussing their pain	40%
Percentage of people who said pain affected their moods on a daily basis	51%
Percentage of people who said pain interfered with their sleep	57%
Percentage of people who said they felt isolated and alone due to pain	37%

*Source: Institute of Medicine (June 29, 2011) report on pain
 **Source: Survey of Pain in America, conducted by Partners Against Pain, 2002

Power Outage

What happens when the power goes out? No television, no computer, no microwave. Do you ignore a power outage? Of course not. You accept it - and find new ways of doing things until power returns.

Pain is kind of like a power outage. Suddenly, things you used to take for granted are more difficult ... or even impossible. But once you *accept the pain*, you can *take control* of your life, find new ways of doing things, and play an active role in your recovery.



Think about it!

Doctors may be medical experts...but you are the expert on your own body. No one knows what you are feeling better than you do - and it doesn't take a formal medical diagnosis to know your pain is real. You deserve to be treated fairly and respectfully.

You can't change the wind but you can learn to adjust your sails.

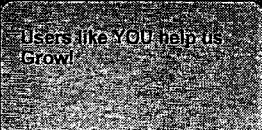


EXHIBIT # 13
 DATE _____
 DEPONENT _____
 PROFESSIONAL REPORTERS (800) 276-1006

- Billie Joe Armstrong, vocalist and musician for the band Green Day



Watch the demo

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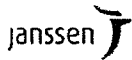


EXHIBIT G

For Adolescents Living with Pain

For Parents

View Demo

Login

Register



How do you feel today?

Enter a word or phrase

Know Your Emotions

Communicating To Others

Family

Parents

Siblings

Peers

Other Adults

Health Care Providers

Identify Your Emotions

Home :: Know Your Emotions

Know Your Emotions

It doesn't matter if other people can't see your pain.

You know it's real and you are entitled to all of the emotions - both good and bad - associated with your pain. Maybe you're determined to beat it one day, then you're down-in-the-dumps the next. That's normal - as long as you're able to deal with your feelings so they don't get the best of you.

Grief Regret Depression Resentment

Do you ever feel like pain robbed you of some of your goals and dreams? That can lead to *really* overwhelming emotions and they aren't so easy to shake.

But emotions can shift. Attitudes can change.

Try reshaping your thoughts to think about pain in a new way:

Suppose you're on a road trip and you hit an unexpected detour. The new road may not be the fastest route, it may not be the one you preferred, but maybe you saw some beautiful scenery along the way ... discovered a cool little internet cafe ... saw a billboard that made you laugh ... or talked to a local who made you smile. Look at a map and you'll realize *lots of different roads* can lead you to the same destination.

Do you ever feel *ashamed* of your pain? Society sends us signals about how it expects guys and girls to behave. If a guy shows emotion, he's a "crybaby." If a girl complains, she's being a "drama queen." Let go of those stereotypes because you have the right to be respected for who you are and what you feel.

Visit *Know Your Rights - Be Treated With Respect*

"I decided to accept my pain and realized I would not be the same person without it. It helped me to see areas of myself and others that I might not have been sensitive enough to see otherwise. I told my friends, I started to communicate openly and almost with pride. It put an end to the isolation and shame that I felt."

-Maggie, 16



Think about it!

Pain may have taken you on an unexpected detour in life - but consider some of the *positives* you've encountered as you travel this new path:

- Have you met a kind and helpful person as a result of your pain?
- Have you developed a new skill to help you overcome challenges?
- Is there a small thing in life you now appreciate more because of your pain?
- Is there something you used to take for granted that you don't anymore?
- Has a relationship improved because of your pain?

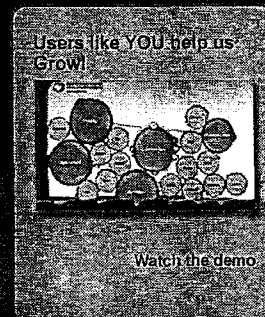
EXHIBIT #	<u>14</u>
DATE	_____
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PROFESSIONAL REPORTERS	(800) 276-1006

- Has your pain helped you to become more mature?
- Have you learned an important lesson because of your pain?

Normally, you have chosen to grow. And your pain experience has made you a stronger person.

It's not whether you get knocked down; it's whether you get back up.

- Vince Lombardi, legendary football coach



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American Chronic Pain Association

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