



IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

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

Plaintiff,

Case No. CJ-2017-816
Honorable Thad Balkman

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;
(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 } S.S.
CLEVELAND COUNTY }

FILED

AUG 06 2019

In the office of the
Court Clerk MARILYN WILLIAMS

**TEVA AND ACTAVIS GENERIC DEFENDANTS' RESPONSE TO
NON-PARTY CBS NEWS' MOTION TO INTERVENE AND APPLICATION TO
UNSEAL JUDICIAL RECORDS**

Teva Pharmaceuticals USA, Inc. and Cephalon, Inc. (collectively the "Teva Defendants") and Watson Laboratories, Inc., Actavis LLC, Actavis Pharma, Inc. (collectively, the "Actavis Generic Defendants") do not object to the unsealing of the limited documents to which non-party CBS News seeks access in its motion, save for one document. That document, a supply and distribution agreement, should remain sealed, as explained below.

A. The Teva and Actavis Generic Defendants Do Not Object To The Unsealing of the Vast Majority of the Documents CBS News Seeks.

The limited documents to which CBS News seeks access are listed on pages 3 and 4 of its motion and are comprised of “motions, exhibits, and all responses and replies” related to:

- Cephalon’s February 26, 2019 Motion for Partial Summary Judgment;
- Teva’s March 15, 2019 Motion for Partial Summary Judgment;
- Teva/Cephalon’s April 23, 2019 Motion for Summary Judgment;
- Teva/Cephalon’s May 9, 2019 Reply in Support of their Motion for Summary Judgment; and
- Transcripts of the hearings on the Motions for Summary Judgment.

CBS News also seeks to unseal “Exhibit 70” to Stipulation No. 1 filed on June 25, 2019, to the extent that it has been filed with the Court. The Teva and Actavis Generic Defendants are not aware whether that document was, in fact, filed with the Court during trial. If it was so filed, then the Teva and Actavis Generic Defendants do not object to its unsealing.

The Teva and Actavis Generic Defendants recognize that, although they may not object to the unsealing of the above documents, other parties to the case may. For example, certain of the documents sought to be unsealed were designated, pursuant to this Court’s April 18, 2018 Amended Protective Order, as confidential by the State of Oklahoma. The Teva and Actavis Generic Defendants take no position on the unsealing of documents or information designated confidential by the State or other parties and filed under seal by them.

In addition, the Teva and Actavis Generic Defendants’ non-objection to the unsealing of the limited group of documents listed on pages 3 and 4 of CBS News’ motion should not be

construed as a blanket agreement to unseal all of the documents filed with the Court in this case.

The Consent Judgment entered by this Court on June 24, 2019 specifically states that

The Court's Amended Protective Order (dated April 16, 2018) and the First Amended Agreed Qualified Protective Order for Protected Health Information (dated September 27, 2018) (the "Protective Orders") remain in effect after the Effective Date and the Settling Parties shall comply with their terms.

Consent Judgment ¶ 9.10.¹ The Teva and Actavis Generic Defendants have and will abide by the Consent Judgment and reserve their right to respond to any further motion to unseal specific documents in this case.

B. The Supply and Distribution Agreement Should Remain Under Seal.

While the Teva and Actavis Generic Defendants do not object to the unsealing of the vast majority of the limited documents to which non-party CBS News seeks access in its motion, they do however ask that the Court maintain under seal one document: the October 13, 2005 Distribution and Supply Agreement between Purdue Pharma L.P. and Watson Pharma, Inc. (the "Supply & Distribution Agreement").

The State filed, under seal, the Supply & Distribution Agreement as Exhibit 70 to its April 2, 2019 response to the Generic Manufacturers' Motion for Partial Summary Judgment, and also as Exhibit 56 to its May 3, 2019 response to the Teva and Actavis Generic Defendants' Motion for Summary Judgment. A copy of that document is attached as "Exhibit A" and is filed under seal.

¹ In its motion, CBS News states that this Court's Consent Judgment did not incorporate "the [Teva] settlement agreement's provisions regarding confidentiality, particularly paragraph 12 of 'Miscellaneous Provisions' ('Confidentiality of Documents Produced in this Action')[.]" CBS News Mot. at 4. That is not correct. Paragraph 12 of the settlement agreement's "Miscellaneous Provisions" is repeated word-for-word in Paragraph 9.10 of the Consent Judgment.

This Court's April 18, 2019 Amended Protective Order provides that a party may designate as "confidential" and file under seal documents which contain "commercial information" pursuant to 12 O.S. § 3226(C)(1)(g). Am. Prot. Order at 3. The provisions of the Amended Protective Order governing confidentiality were incorporated both in this Court's June 24, 2019 Consent Judgment regarding the Teva and Actavis Generic Defendants' settlement agreement with the State, as well as in the settlement agreement itself. *See* Consent Judgment ¶ 9.10; Settlement Agreement ¶ 12. Both the State and the Teva and Actavis Generic Defendants have complied with the terms of the Consent Judgment and the settlement agreement.

The Supply & Distribution Agreement contains confidential commercial information protected by 12 O.S. § 3226(C)(1)(g), and no party to this lawsuit sought to remove the confidentiality designation. Indeed, the State recognized that it contains protected confidential information, treated it as such, and never moved to unseal it. That information includes pricing, production, and other confidential business information the disclosure of which potentially would be harmful to the Teva and Actavis Generic Defendants' commercial interests. *See, e.g.*, Supply & Distribution Agreement, Article XI, Schedules 1.1B, 4.2.,1, 4.3.1. The Supply & Distribution Agreement also contains a confidentiality provision that requires that Watson not disclose the existence of the Agreement or its terms without express written consent. *See* Supply & Distribution Agreement, Article XI ("Confidentiality").

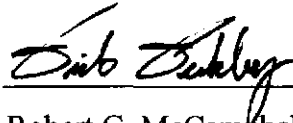
This Court therefore should deny CBS News' request to unseal the Supply & Distribution Agreement. The Teva and Actavis Generic Defendants complied with the provisions of this Court's Amended Protective Order in designating that document confidential when it was produced. The State complied with the Amended Protective Order when it filed that document as a sealed exhibit to its responses to motions for summary judgment. The parties and the Court

agreed that the provisions of the Amended Protective Order would remain in place and survive the Teva and Actavis Generic Defendants' settlement and dismissal from the case. The document contains confidential business information that is subject to protection of 12 O.S. § 3226.

In sum, the Teva and Actavis Generic Entities do not object to the Court unsealing the vast majority of documents sought by CBS News' motion. The Court, however, should maintain the Supply & Distribution Agreement, which was an exhibit to two of the State's responses, under seal in accordance with the Amended Protective Order, the Consent Judgment, and the Teva and Actavis Generic Defendants' settlement agreement.

Respectfully submitted,

Dated: August 6, 2019



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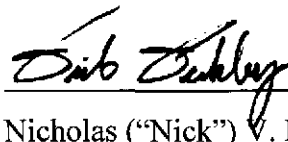
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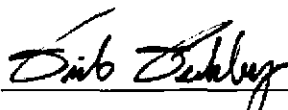
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**Case No. CJ-2017-816
Honorable Thad Balkman**

**EXHIBIT A TO TEVA AND ACTAVIS GENERIC DEFENDANTS' RESPONSE TO
NON-PARTY CBS NEWS' MOTION TO INTERVENE AND APPLICATION TO
UNSEAL JUDICIAL RECORDS FILED UNDER SEAL PURSUANT TO PROTECTIVE
ORDER DATED MARCH 20, 2018**

Dated: August 6, 2019



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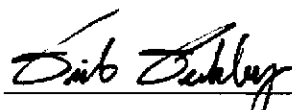
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