

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

ALL CASES

MDL No. 2804

Case No. 1:17-md- 2804

Hon. Dan Aaron Polster

ENDO DEFENDANTS'
MOTION FOR LEAVE TO FILE MEMORANDUM IN EXCESS OF 15 PAGES

Pursuant to Local Rule 7.1, Endo Pharmaceuticals Inc. and Endo Health Solutions Inc. (hereinafter “Endo”), respectfully move this Court for leave to file a memorandum in excess of 15 pages in response to the Plaintiffs’ now-joint Motion to Disqualify. Endo requests leave to file a responsive memorandum of no more than 26 pages.

On January 8, 2019 plaintiff City of Cleveland moved for leave to file a Motion to Disqualify Carole Rendon Under Seal. Dkt. 1232. That motion was granted the same day. Dkt. 1234. The City of Cleveland filed its Motion to Disqualify on January 10, 2019; and, shortly thereafter on January 14, 2019, Summit County, Cuyahoga County and the City of Akron filed a Joint Motion to Join in the City of Cleveland’s Motion to Disqualify. Dkt. 1241; Dkt. 1246.

The City of Cleveland exceeded the 15-page limit set forth in Local Rule 7.1(f) without leave of this Court. The motion and memorandum in support of the City of Cleveland’s Motion to Disqualify total 26 pages and contain 18 exhibits. The Motion to Disqualify presents several theories of disqualification, contains a de facto motion to compel Ms. Rendon’s deposition and contains several misrepresentations all of which Endo must address. Consequently, Endo respectfully requests 26 pages in which to respond to the Plaintiffs’ Motion to Disqualify. Endo believes that a 26-page memorandum in response to the 26-page

motion and memorandum filed by the City of Cleveland and joined by the additional Plaintiffs is necessary, reasonable and does not prejudice Plaintiffs.¹

DATED: January 22, 2019

/s/ John D. Parker

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¹ If the Court is inclined to deny this Motion for Leave, Endo moves that the Court strike the memorandum in support of the City's Motion to Disqualify because it does not comply with Local Rule 7.1.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 22, 2019, the foregoing was filed electronically with the Clerk of Court using the Court's CM/ECF system, and will be served via the Court's CM/ECF filing system on all attorneys of record.

DATED: January 22, 2019

/s/ John D. Parker
John D. Parker