

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

THIS DOCUMENT RELATES TO:

*The County of Summit, Ohio*, et al. v.  
*Purdue Pharma L.P.*, et al.,  
Case No. 18-op-45090

MDL No. 2804

Case No. 1:17-md-2804

Judge Dan Aaron Polster

**JOINT MOTION TO STAY THE RESPONSIVE BRIEFING DEADLINE FOR  
WALGREENS BOOTS ALLIANCE INC'S  
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

Plaintiffs in the above-captioned case and Defendant Walgreens-Boots Alliance, Inc. (“WBA”) hereby jointly move to stay the responsive briefing deadline to WBA’s Motion to Dismiss for Lack of Personal Jurisdiction (Dkt. 494) for fourteen (14) days.

On May 25, 2018, WBA moved to dismiss the complaint in the above-captioned case for lack of personal jurisdiction under Federal Rule of Civil Procedure 12(b)(2). Plaintiffs and Defendant WBA are currently working to identify and confirm the proper party (or parties) to substitute for Defendant WBA. Plaintiffs and Defendant WBA jointly request that the responsive briefing deadline to WBA’s Motion to Dismiss for Lack of Personal Jurisdiction be extended by 14 days, until July 6, 2018, so that the Plaintiffs may seek to substitute another entity for WBA and to dismiss WBA, thereby mooting WBA’s personal jurisdiction motion.

This motion is without prejudice to any defenses, counterclaims, cross-claims, arguments, or other legal positions available to WBA as a Defendant in this case.

Date: June 22, 2018

Respectfully submitted,

/s/ Linda Singer

---

Joseph F. Rice  
Lisa Saltzburg  
**MOTLEY RICE LLC**  
28 Bridgeside Blvd.  
Mount Pleasant, SC 29464  
Tel: 843-216-9000  
Fax: 843-216-9450  
[jrice@motleyrice.com](mailto:jrice@motleyrice.com)  
[lsaltzburg@motleyrice.com](mailto:lsaltzburg@motleyrice.com)

Linda Singer  
Louis Bograd  
**MOTLEY RICE LLC**  
401 9<sup>th</sup> Street NW, Suite 1001  
Washington, DC 20004  
Tel: 202-232-5504  
Fax: 202-386-9622  
[lsinger@motleyrice.com](mailto:lsinger@motleyrice.com)  
[lbograd@motleyrice.com](mailto:lbograd@motleyrice.com)

Donald W. Davis, Jr.  
Adam D. Fuller  
Elizabeth Shively Boatwright  
**BRENNAN, MANNA & DIAMOND, LLC**  
75 East Market Street  
Akron, OH 44308  
Tel: 330-253-5060  
[dwdavis@bmdllc.com](mailto:dwdavis@bmdllc.com)  
[adfuller@bmdllc.com](mailto:adfuller@bmdllc.com)  
[esboatwright@bmdllc.com](mailto:esboatwright@bmdllc.com)

*Attorneys for the Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 22nd day of June 2018, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF System. The foregoing will be served on counsel of record.

/s/ Linda Singer  
Linda Singer

*Attorney for the Plaintiffs*