

**Hearing Date: October 11, 2019 at 10:00 am (Prevailing Eastern Time)**  
**Objection Deadline: October 2, 2019 at 4:00 pm (Prevailing Eastern Time)**

DAVIS POLK & WARDWELL LLP  
450 Lexington Avenue  
New York, New York 10017  
Telephone: (212) 450-4000  
Facsimile: (212) 701-5800  
Marshall S. Huebner  
Benjamin S. Kaminetzky  
James I. McClammy  
Marc J. Tobak  
Gerard X. McCarthy

*Proposed Counsel to the Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., et al.,  
  
Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)**

**(Jointly Administered)**

**PURDUE PHARMA L.P., PURDUE  
PHARMA INC.,  
PURDUE TRANSDERMAL  
TECHNOLOGIES L.P., PURDUE  
PHARMA MANUFACTURING L.P.,  
PURDUE PHARMACEUTICALS L.P.,  
PURDUE PHARMA OF PUERTO RICO,  
PURDUE PHARMACEUTICAL**

**Adv. Pro. No. 19-08289 (RDD)**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

**PRODUCTS L.P., RHODES  
PHARMACEUTICALS L.P.,  
RHODES TECHNOLOGIES, and AVRIO  
HEALTH L.P.,**

**Plaintiffs,**

**v.**

**COMMONWEALTH OF  
MASSACHUSETTS; COMMONWEALTH  
OF PENNSYLVANIA by ATTORNEY  
GENERAL JOSH SHAPIRO;  
COMMONWEALTH OF VIRGINIA, *ex rel.*  
MARK R. HERRING, ATTORNEY  
GENERAL; THE STATE OF ALABAMA;  
STATE OF ALASKA; STATE OF  
ARIZONA, *ex rel.* MARK BRNOVICH,  
ATTORNEY GENERAL; STATE OF  
ARKANSAS, *ex rel.* LESLIE RUTLEDGE;  
THE PEOPLE OF THE STATE OF  
CALIFORNIA; THE STATE OF  
COLORADO, *ex rel.* PHILIP J. WEISER,  
ATTORNEY GENERAL; STATE OF  
CONNECTICUT; DISTRICT OF  
COLUMBIA; STATE OF DELAWARE, *ex  
rel.* KATHY JENNINGS; STATE OF  
FLORIDA, OFFICE OF THE ATTORNEY  
GENERAL, DEPARTMENT OF LEGAL  
AFFAIRS; STATE OF GEORGIA;  
TERRITORY OF GUAM; STATE OF  
HAWAII, *ex rel.* CLARE E. CONNORS,  
ATTORNEY GENERAL; STATE OF  
IDAHO, through ATTORNEY GENERAL  
LAWRENCE G. WASDEN; THE PEOPLE  
OF THE STATE OF ILLINOIS; STATE  
OF INDIANA; STATE OF IOWA,  
THOMAS J. MILLER, ATTORNEY  
GENERAL OF IOWA; STATE OF  
KANSAS, *ex rel.* DEREK SCHMIDT,  
ATTORNEY GENERAL; STATE OF LA  
F/K/A LOUISIANA DEPT. OF HEALTH;  
STATE OF MAINE; CONSUMER  
PROTECTION DIVISION OFFICE OF  
THE ATTORNEY GENERAL (Md.);  
STATE OF MINNESOTA by its  
ATTORNEY GENERAL, KEITH**

ELLISON; STATE OF MISSISSIPPI;  
STATE OF MISSOURI, *ex rel.* ERIC  
SCHMITT, in his official capacity as  
MISSOURI ATTORNEY GENERAL;  
STATE OF MONTANA; STATE OF  
NEVADA; STATE OF NEW HAMPSHIRE;  
GURBIR S. GREWAL, ATTORNEY  
GENERAL OF THE STATE OF NEW  
JERSEY; PAUL RODRIGUEZ, ACTING  
DIRECTOR OF THE NEW JERSEY  
DIVISION OF CONSUMER AFFAIRS;  
STATE OF NEW MEXICO, *ex rel.*  
HECTOR BALDERAS, ATTORNEY  
GENERAL; THE PEOPLE OF THE  
STATE OF NEW YORK, by LETITIA  
JAMES, ATTORNEY GENERAL OF THE  
STATE OF NEW YORK; STATE OF  
NORTH CAROLINA, *ex rel.* JOSH STEIN,  
ATTORNEY GENERAL; STATE OF  
NORTH DAKOTA, *ex rel.* WAYNE  
STENEHJEM, ATTORNEY GENERAL;  
STATE OF OHIO, *ex rel.* DAVID YOST,  
OHIO ATTORNEY GENERAL; STATE  
OF OREGON, *ex rel.* ELLEN F.  
ROSENBLUM, ATTORNEY GENERAL  
FOR THE STATE OF OREGON; THE  
COMMONWEALTH OF PUERTO RICO;  
STATE OF RHODE ISLAND, by and  
through PETER NERONHA, ATTORNEY  
GENERAL; STATE OF SOUTH  
CAROLINA, *ex rel.* ALAN WILSON  
ATTORNEY GENERAL; STATE OF  
SOUTH DAKOTA, *ex rel.* JASON  
RAVNSBORG, SOUTH DAKOTA  
ATTORNEY GENERAL; STATE OF  
TENNESSEE, *ex rel.* HERBERT H.  
SLATERY III, ATTORNEY GENERAL  
AND REPORTER; STATE OF TEXAS;  
UTAH DIVISION OF CONSUMER  
PROTECTION; STATE OF VERMONT;  
STATE OF WASHINGTON; STATE OF  
WEST VIRGINIA, *ex rel.* PATRICK  
MORRISEY, ATTORNEY GENERAL;  
STATE OF WISCONSIN; STATE OF  
WYOMING, *ex rel.* BRIDGET HILL,  
ATTORNEY GENERAL; THE

**BLACKFEET TRIBE OF THE  
BLACKFEET INDIAN RESERVATION;  
THE MUSCOGEE (CREEK) NATION;  
CITIZEN POTAWATOMI NATION; SAC  
& FOX NATION; DELAWARE NATION;  
APACHE TRIBE OF OKLAHOMA; THE  
OSAGE NATION; PAWNEE NATION OF  
OKLAHOMA; THLOPTHLOCCO  
TRIBAL TOWN; BULLHEAD CITY;  
CITY OF GLENDALE; CITY OF  
PRESCOTT; CITY OF SURPRISE;  
COUNTY OF APACHE; COUNTY OF LA  
PAZ; STATE OF ARKANSAS, *ex rel.*  
SCOTT ELLINGTON; COUNTY OF  
ARKANSAS; COUNTY OF ASHLEY;  
COUNTY OF BAXTER; COUNTY OF  
BENTON; COUNTY OF BOONE;  
COUNTY OF BRADLEY; COUNTY OF  
CALHOUN; COUNTY OF CHICOT;  
COUNTY OF CLARK; COUNTY OF  
CLAY; COUNTY OF CLEBURNE;  
COUNTY OF COLUMBIA; COUNTY OF  
CONWAY; COUNTY OF CRAIGHEAD;  
COUNTY OF CRAWFORD; COUNTY OF  
CROSS; COUNTY OF DALLAS; COUNTY  
OF DESHA; COUNTY OF FAULKNER;  
COUNTY OF FRANKLIN; COUNTY OF  
FULTON; COUNTY OF GARLAND;  
COUNTY OF GRANT; COUNTY OF  
GREENE; COUNTY OF HEMPSTEAD;  
COUNTY OF HOT SPRING; COUNTY OF  
HOWARD; COUNTY OF  
INDEPENDENCE; COUNTY OF IZARD;  
COUNTY OF JACKSON; COUNTY OF  
JOHNSON; COUNTY OF LAFAYETTE;  
COUNTY OF LAWRENCE; COUNTY OF  
LEE; COUNTY OF LINCOLN; COUNTY  
OF LITTLE RIVER; COUNTY OF  
LOGAN; COUNTY OF LONOKE;  
COUNTY OF MADISON; COUNTY OF  
MILLER; COUNTY OF MISSISSIPPI;  
COUNTY OF MONROE; COUNTY OF  
MONTGOMERY; COUNTY OF  
OUACHITA; COUNTY OF PERRY;  
COUNTY OF PHILLIPS; COUNTY OF  
PIKE; COUNTY OF POINSETT;**

COUNTY OF POLK; COUNTY OF POPE;  
COUNTY OF PRAIRIE; COUNTY OF  
RANDOLPH; COUNTY OF ST. FRANCIS;  
COUNTY OF SALINE; COUNTY OF  
SCOTT; COUNTY OF SEARCY;  
COUNTY OF SEBASTIAN; COUNTY OF  
SEVIER; COUNTY OF SHARP; COUNTY  
OF STONE; COUNTY OF UNION;  
COUNTY OF VAN BUREN; COUNTY OF  
WASHINGTON; COUNTY OF WHITE;  
COUNTY OF WOODRUFF; COUNTY OF  
YELL; COUNTY OF CARROLL;  
COUNTY OF NEWTON; COUNTY OF  
CLEVELAND; CITY OF LITTLE ROCK;  
CITY OF FORT SMITH; CITY OF  
SPRINGDALE; CITY OF JONESBORO;  
CITY OF NORTH LITTLE ROCK; CITY  
OF CONWAY; CITY OF ROGERS; CITY  
OF PINE BLUFF; CITY OF  
BENTONVILLE; CITY OF HOT  
SPRINGS; CITY OF BENTON; CITY OF  
TEXARKANA; CITY OF SHERWOOD;  
CITY OF JACKSONVILLE; CITY OF  
MONTICELLO; CITY OF EL MONTE,  
and THE PEOPLE OF THE STATE OF  
CALIFORNIA, by and through EL MONTE  
CITY ATTORNEY RICK OLIVAREZ;  
COUNTY OF KERN, and THE PEOPLE  
OF THE STATE OF CALIFORNIA, by and  
through KERN COUNTY COUNSEL  
MARGO RAISON; THE PEOPLE OF THE  
STATE OF CALIFORNIA, acting by and  
through SANTA CLARA COUNTY  
COUNSEL JAMES R. WILLIAMS; THE  
PEOPLE OF THE STATE OF  
CALIFORNIA, acting by and through  
ORANGE COUNTY DISTRICT  
ATTORNEY TONY RACKAUCKAS; THE  
PEOPLE OF THE STATE OF  
CALIFORNIA, acting by and through LOS  
ANGELES COUNTY COUNSEL MARY C.  
WICKHAM; THE PEOPLE OF THE  
STATE OF CALIFORNIA, acting by and  
through OAKLAND CITY ATTORNEY  
BARBARA J. PARKER; CITY OF NEW  
BRITAIN; THE CITY OF ANSONIA; THE

**CITY OF DANBURY; THE CITY OF  
DERBY; THE CITY OF NORWALK; THE  
CITY OF BRIDGEPORT; THE  
BOROUGH OF NAUGATUCK; THE  
TOWN OF SOUTHBURY; THE TOWN OF  
WOODBURY; THE TOWN OF  
FAIRFIELD; THE TOWN OF BEACON  
FALLS; THE CITY OF MILFORD; THE  
CITY OF WEST HAVEN; THE TOWN OF  
NORTH HAVEN; THE TOWN OF  
THOMASTON; THE CITY OF  
TORRINGTON; THE CITY OF BRISTOL;  
THE TOWN OF EAST HARTFORD; THE  
TOWN OF SOUTHLINGTON; THE TOWN  
OF NEWTOWN; THE CITY OF  
SHELTON; THE TOWN OF TOLLAND;  
THE TOWN OF OXFORD; THE CITY OF  
NEW HAVEN; THE CITY OF NEW  
LONDON; THE CITY OF WATERBURY;  
THE TOWN OF STRATFORD; THE  
TOWN OF BERLIN; THE TOWN OF  
MIDDLEBURY; THE TOWN OF  
SEYMOUR; THE TOWN OF PROSPECT;  
THE TOWN OF WOLCOTT; THE TOWN  
OF BETHLEHEM; THE TOWN OF NEW  
MILFORD; THE TOWN OF ROXBURY;  
THE TOWN OF COVENTRY; TOWN OF  
WALLINGFORD; CITY OF DOVER, a  
municipal corporation of the State of  
Delaware; CITY OF SEAFORD, a  
municipal corporation of the State of  
Delaware; KENT COUNTY, a political  
subdivision of the State of Delaware;  
COUNTY OF HAWAII; COUNTY OF  
LAKE; MICHAEL NERHEIM, LAKE  
COUNTY STATE'S ATTORNEY; MARK  
C. CURRAN JR., LAKE COUNTY  
SHERIFF; DR. HOWARD COOPER,  
LAKE COUNTY CORONER; THE  
COUNTY OF LAKE in the Name of the  
PEOPLE OF THE STATE OF ILLINOIS;  
CITY OF SESSER; CITY OF GRANITE  
CITY, ILLINOIS; THE CITY OF  
BURBANK; THE CITY OF  
COUNTRYSIDE; THE PEOPLE OF THE  
STATE OF ILLINOIS AND BOONE**

COUNTY, ILLINOIS; THE PEOPLE OF  
THE STATE OF ILLINOIS AND BUREAU  
COUNTY, ILLINOIS; THE PEOPLE OF  
THE STATE OF ILLINOIS AND  
CHAMPAIGN COUNTY, ILLINOIS; THE  
PEOPLE OF THE STATE OF ILLINOIS  
AND COOK COUNTY, ILLINOIS; THE  
PEOPLE OF THE STATE OF ILLINOIS,  
AND DUPAGE COUNTY, ILLINOIS; THE  
PEOPLE OF THE STATE OF ILLINOIS  
AND JERSEY COUNTY, ILLINOIS; THE  
PEOPLE OF THE STATE OF ILLINOIS  
AND LASALLE COUNTY; THE PEOPLE  
OF THE STATE OF ILLINOIS AND  
MACON COUNTY, ILLINOIS; THE  
PEOPLE OF THE STATE OF ILLINOIS  
AND MCLEAN COUNTY, ILLINOIS; THE  
PEOPLE OF THE STATE OF ILLINOIS,  
AND DEKALB COUNTY, ILLINOIS; THE  
PEOPLE OF THE STATE OF ILLINOIS,  
AND HENRY COUNTY, ILLINOIS; THE  
PEOPLE OF THE STATE OF ILLINOIS,  
AND KANE COUNTY, ILLINOIS; THE  
PEOPLE OF THE STATE OF ILLINOIS  
AND KANKAKEE COUNTY, ILLINOIS;  
THE PEOPLE OF THE STATE OF  
ILLINOIS, AND KENDALL COUNTY,  
ILLINOIS; THE PEOPLE OF THE STATE  
OF ILLINOIS, AND MACOUPIN  
COUNTY, ILLINOIS; THE PEOPLE OF  
THE STATE OF ILLINOIS, AND  
MCHENRY COUNTY, ILLINOIS; THE  
PEOPLE OF THE STATE OF ILLINOIS,  
AND PIATT COUNTY, ILLINOIS; THE  
PEOPLE OF THE STATE OF ILLINOIS,  
AND WILL COUNTY, ILLINOIS; THE  
VILLAGE OF BEDFORD PARK; THE  
VILLAGE OF EVERGREEN PARK; THE  
VILLAGE OF LYONS; THE VILLAGE OF  
SUMMIT; VILLAGE OF BRIDGEVIEW;  
VILLAGE OF HODGKINS; CITY OF  
ROCKLAND, STATE OF MAINE; KNOX  
COUNTY, STATE OF MAINE; ANNE  
ARUNDEL COUNTY, MARYLAND;  
MAYOR & CITY COUNCIL OF  
BALTIMORE; CITY OF BOSTON; THE

**BOSTON PUBLIC HEALTH  
COMMISSION; THE BOSTON HOUSING  
AUTHORITY; CITY OF CAMBRIDGE;  
CITY OF CHICOPEE; CITY OF  
FRAMINGHAM; CITY OF  
GLOUCESTER; CITY OF HAVERHILL;  
CITY OF SALEM; CITY OF  
WORCESTER; TOWN OF CANTON;  
TOWN OF LYNNFIELD; TOWN OF  
NATICK; TOWN OF RANDOLPH; TOWN  
OF SPRINGFIELD; TOWN OF  
WAKEFIELD; JEFFERSON COUNTY;  
BUTLER COUNTY; CAPE GIRARDEAU  
COUNTY; CHRISTIAN COUNTY; CITY  
OF INDEPENDENCE; CITY OF JOPLIN;  
CRAWFORD COUNTY; DENT COUNTY;  
DUNKLIN COUNTY; FRANKLIN  
COUNTY; GREENE COUNTY; IRON  
COUNTY; JASPER COUNTY; MADISON  
COUNTY; PERRY COUNTY; STE.  
GENEVIEVE COUNTY; STONE  
COUNTY; TANEY COUNTY; TEXAS  
COUNTY; WASHINGTON COUNTY;  
CITY OF HENDERSON; CITY OF LAS  
VEGAS; CITY OF NORTH LAS VEGAS;  
CITY OF RENO; CLARK COUNTY; CITY  
OF TRENTON; COUNTY OF OCEAN, NJ;  
CUMBERLAND COUNTY; THE CITY OF  
ALBANY; CITY OF ITHACA; CITY OF  
NEW YORK; CITY OF SCHENECTADY;  
CITY OF YONKERS; COUNTY OF  
BROOME; COUNTY OF COLUMBIA;  
COUNTY OF DUTCHESS; COUNTY OF  
ERIE; COUNTY OF NASSAU; COUNTY  
OF NIAGARA; COUNTY OF ORANGE;  
COUNTY OF OSWEGO; CITY OF TROY;  
COUNTY OF RENSSELAER; COUNTY  
OF SARATOGA; COUNTY OF  
HERKIMER; COUNTY OF  
SCHENECTADY; COUNTY OF  
SCHOHARIE; COUNTY OF SENECA;  
COUNTY OF ST. LAWRENCE; COUNTY  
OF SUFFOLK; COUNTY OF SULLIVAN;  
COUNTY OF TOMPKINS; COUNTY OF  
WESTCHESTER; COUNTY OF  
MONTGOMERY; THE CITY OF MOUNT**



**VERNON; THE COUNTY OF  
CATTARAUGUS; THE COUNTY OF  
CAYUGA; THE COUNTY OF  
CHAUTAUQUA; THE COUNTY OF  
CHENANGO; THE COUNTY OF  
CLINTON; THE COUNTY OF ONTARIO;  
THE COUNTY OF CORTLAND; THE  
COUNTY OF ESSEX; THE COUNTY OF  
FRANKLIN; THE COUNTY OF FULTON;  
THE COUNTY OF GENESEE; THE  
COUNTY OF GREENE; THE COUNTY  
OF HAMILTON; CITY OF  
PLATTSBURGH; THE COUNTY OF  
LEWIS; THE COUNTY OF LIVINGSTON;  
THE COUNTY OF MADISON; THE  
COUNTY OF MONROE; THE COUNTY  
OF OTSEGO; THE COUNTY OF  
PUTNAM; THE COUNTY OF  
SCHUYLER; THE COUNTY OF  
STEUBEN; THE COUNTY OF TIOGA;  
THE COUNTY OF ULSTER; THE  
COUNTY OF WARREN; THE COUNTY  
OF WASHINGTON; THE COUNTY OF  
WYOMING; THE TOWN OF AMHERST;  
THE TOWN OF CHEEKTOWAGA; THE  
TOWN OF LANCASTER; THE TOWN OF  
TONAWANDA; THE COUNTY OF  
FAYETTE, OHIO; THE STATE OF OHIO  
*ex rel.* PROSECUTING ATTORNEY OF  
FAYETTE COUNTY, JESS WEADE; THE  
COUNTY OF MEDINA, OHIO; THE  
STATE OF OHIO *ex rel.* PROSECUTING  
ATTORNEY OF MEDINA COUNTY, S.  
FORREST THOMPSON; BOARD OF  
COUNTY COMMISSIONERS OF  
CLEVELAND COUNTY; BOARD OF  
COUNTY COMMISSIONERS OF COAL  
COUNTY; BOARD OF COUNTY  
COMMISSIONERS OF HUGHES  
COUNTY; BOARD OF COUNTY  
COMMISSIONERS OF JACKSON  
COUNTY; BOARD OF COUNTY  
COMMISSIONERS OF KAY COUNTY;  
BOARD OF COUNTY COMMISSIONERS  
OF LINCOLN COUNTY; BOARD OF  
COUNTY COMMISSIONERS OF LOVE**

COUNTY; BOARD OF COUNTY  
COMMISSIONERS OF MCCURTAIN  
COUNTY; BOARD OF COUNTY  
COMMISSIONERS OF NOBLE COUNTY;  
BOARD OF COUNTY COMMISSIONERS  
OF OKFUSKEE COUNTY; BOARD OF  
COUNTY COMMISSIONERS OF  
OKLAHOMA COUNTY; BOARD OF  
COUNTY COMMISSIONERS OF  
POTTAWATOMIE COUNTY; BOARD OF  
COUNTY COMMISSIONERS OF  
WOODWARD COUNTY; BOARD OF  
COUNTY COMMISSIONERS OF MAJOR  
COUNTY; BOARD OF COUNTY  
COMMISSIONERS OF WOODS  
COUNTY; BOARD OF COUNTY  
COMMISSIONERS OF GREER COUNTY;  
BOARD OF COUNTY COMMISSIONERS  
OF LEFLORE COUNTY; BOARD OF  
COUNTY COMMISSIONERS OF LOGAN  
COUNTY; BOARD OF COUNTY  
COMMISSIONERS OF TEXAS COUNTY;  
CITY OF ANADARKO; CITY OF BURNS  
FLAT; CITY OF FORT COBB; CITY OF  
BETHANY; COMMONWEALTH OF PA,  
acting by and through PHILADELPHIA  
DISTRICT ATTORNEY LAWRENCE S.  
KRASNER; COMMONWEALTH OF PA,  
acting by JAMES MARTIN; PEOPLE OF  
LEHIGH COUNTY AND LEHIGH  
COUNTY, PA; ADAMS COUNTY;  
ARMSTRONG COUNTY, PA; BEAVER  
COUNTY, PENNSYLVANIA; BUCKS  
COUNTY; CAMBRIA COUNTY,  
PENNSYLVANIA; CITY OF LOCK  
HAVEN; CITY OF PHILADELPHIA;  
CITY OF PITTSBURGH; CLEARFIELD  
COUNTY; CLINTON COUNTY; COUNTY  
OF ALLEGHENY; COUNTY OF  
BRADFORD; COUNTY OF CARBON;  
COUNTY OF CLARION; COUNTY OF  
CUMBERLAND; COUNTY OF ERIE;  
COUNTY OF FAYETTE; COUNTY OF  
MONROE; COUNTY OF TIOGA;  
COUNTY OF WASHINGTON; COUNTY  
OF WESTMORELAND; COUNTY OF

**YORK; DAUPHIN COUNTY, PA;  
DELAWARE COUNTY; FRANKLIN  
COUNTY; COUNTY OF GREENE,  
PENNSYLVANIA; LACKAWANNA  
COUNTY, PENNSYLVANIA;  
LAWRENCE COUNTY,  
PENNSYLVANIA; MAHONING  
TOWNSHIP; MERCER COUNTY;  
NEWTOWN TOWNSHIP; PEOPLE OF  
NORTHAMPTON COUNTY AND  
NORTHAMPTON COUNTY, PA; PIKE  
COUNTY, PA.; SCHUYLKILL COUNTY,  
PENNSYLVANIA; THE MUNICIPALITY  
OF NORRISTOWN; THE TOWNSHIP OF  
WEST NORRITON; WAMPUM  
BOROUGH; WARRINGTON TOWNSHIP;  
CITY OF CHARLESTON; CITY OF  
NORTH CHARLESTON; COUNTY OF  
ABBEVILLE; COUNTY OF AIKEN;  
COUNTY OF ALLENDALE; COUNTY OF  
ANDERSON; COUNTY OF BAMBERG;  
COUNTY OF BARNWELL; COUNTY OF  
BEAUFORT; COUNTY OF CALHOUN;  
COUNTY OF CHEROKEE; COUNTY OF  
CHESTERFIELD; COUNTY OF  
CLARENDON; COUNTY OF  
COLLETON; COUNTY OF DILLON;  
COUNTY OF DORCHESTER; COUNTY  
OF EDGEFIELD; COUNTY OF  
FAIRFIELD; COUNTY OF FLORENCE;  
COUNTY OF GREENWOOD; COUNTY  
OF HAMPTON; COUNTY OF HORRY;  
COUNTY OF JASPER; COUNTY OF  
KERSHAW; COUNTY OF LANCASTER;  
COUNTY OF LAURENS; COUNTY OF  
LEE; COUNTY OF LEXINGTON;  
COUNTY OF MARION; COUNTY OF  
MCCORMICK; COUNTY OF OCONEE;  
COUNTY OF ORANGEBURG; COUNTY  
OF PICKENS; COUNTY OF SALUDA;  
COUNTY OF SUMTER; COUNTY OF  
UNION; COUNTY OF WILLIAMSBURG;  
COUNTY OF YORK; GREENVILLE  
COUNTY; SPARTANBURG COUNTY;  
TOWN OF MOUNT PLEASANT;  
BRYANT C. DUNAWAY, in his official**

capacity as the DISTRICT ATTORNEY GENERAL FOR THE THIRTEENTH JUDICIAL DISTRICT, TN and on behalf of all political subdivisions therein, including CLAY COUNTY, CITY OF CELINE, CUMBERLAND COUNTY, CITY OF CRAB ORCHARD, CITY OF CROSSVILLE, TOWN OF PLEASANT HILL, DEKALB COUNTY, TOWN OF ALEXANDRIA, TOWN OF DOWELLTOWN, TOWN OF LIBERTY, CITY OF SMITHVILLE, OVERTON COUNTY, TOWN OF LIVINGSTON, PICKETT COUNTY, TOWN OF BYRDSTOWN, PUTNAM COUNTY, CITY OF ALGOOD, TOWN OF BAXTER, CITY OF COOKEVILLE, TOWN OF MONTEREY, WHITE COUNTY, TOWN OF DOYLE, CITY OF SPARTA; JENNING H. JONES, in his official capacity as the DISTRICT ATTORNEY GENERAL FOR THE SIXTEENTH JUDICIAL DISTRICT, TN and on behalf of all political subdivisions therein, including CANNON COUNTY, TOWN OF AUBURNTOWN, TOWN OF WOODBURY, RUTHERFORD COUNTY, CITY OF EAGLEVILLE, CITY OF LA VERGNE, CITY OF MURFREESBORO, TOWN OF SMYRNA; ROBERT J. CARTER, in his official capacity as the DISTRICT ATTORNEY GENERAL FOR THE SEVENTEENTH JUDICIAL DISTRICT, TN and on behalf of all political subdivisions therein, including BEDORD COUNTY, TOWN OF BELL BUCKLE, TOWN OF NORMANDY, CITY OF SHELBYVILLE, TOWN OF WARTRACE, LINCOLN COUNTY, CITY OF ARDMORE, CITY OF FAYETTEVILLE, TOWN OF PETERSBURG, MARSHALL COUNTY, TOWN OF CHAPEL HILL, TOWN OF CORNERSVILLE, CITY OF LEWISBURG, MOORE COUNTY, CITY OF LYNCHBURG; BRENT A. COOPER, in his official capacity as the DISTRICT ATTORNEY GENERAL FOR THE

**TWENTY-SECOND JUDICIAL DISTRICT, TN and on behalf of all political subdivisions therein, including GILES COUNTY, CITY OF ELKTON, TOWN OF LYNNVILLE, CITY OF MINOR HILL, CITY OF PULASKI, LAWRENCE COUNTY, TOWN OF ETHRIDGE, CITY OF IRON CITY, CITY OF LAWRENCEBURG, CITY OF LORETTO, CITY OF ST. JOSEPH, MAURY COUNTY, CITY OF COLUMBIA, CITY OF MOUNT PLEASANT, CITY OF SPRING HILL, WAYNE COUNTY, CITY OF CLIFTON, CITY OF COLLINWOOD, CITY OF WAYNESBORO; LISA S. ZAVOGIANNIS, IN HER OFFICIAL CAPACITY AS THE DISTRICT ATTORNEY GENERAL FOR THE THIRTY-FIRST JUDICIAL DISTRICT, TN and on behalf of all political subdivisions therein, including VAN BUREN COUNTY, TOWN OF SPENCER, WARREN COUNTY, TOWN OF CENTERTOWN, CITY OF MCMINNVILLE, TOWN OF MORRISON, TOWN OF VIOLA; BABY DOE, by and through his Mother; JARED EFFLER, in his official capacity as the DISTRICT ATTORNEY GENERAL FOR THE EIGHTH JUDICIAL DISTRICT, TN; CHARME ALLEN, in her official capacity as the DISTRICT ATTORNEY GENERAL FOR THE SIXTH JUDICIAL DISTRICT; DAVE CLARK, in his official capacity as the DISTRICT ATTORNEY GENERAL FOR THE SEVENTH JUDICIAL DISTRICT, TN; RUSSELL JOHNSON, in his official capacity as the DISTRICT ATTORNEY GENERAL FOR THE NINTH JUDICIAL DISTRICT, TN; STEPHEN CRUMP, in his official capacity as the DISTRICT ATTORNEY GENERAL FOR THE TENTH JUDICIAL DISTRICT, TN; BABY DOE #1; BABY DOE #2; BARRY STAUBUS, in his official capacity as the DISTRICT ATTORNEY GENERAL FOR THE SECOND JUDICIAL DISTRICT AND**

**ON BEHALF OF ALL POLITICAL  
SUBDIVISIONS THEREIN; TONY  
CLARK, in his official capacity as the  
DISTRICT ATTORNEY GENERAL FOR  
THE FIRST JUDICIAL DISTRICT and on  
behalf of all political subdivisions therein;  
DAN ARMSTRONG, in his official capacity  
as the DISTRICT ATTORNEY GENERAL  
FOR THE THIRD JUDICIAL DISTRICT  
and on behalf of all political subdivisions  
therein; BABY DOE, by and through his  
Guardian Ad Litem; SHELBY COUNTY,  
by the SHELBY BOARD OF  
COMMISSIONERS; CITY OF HOUSTON,  
TEXAS; COUNTY OF BEE; COUNTY OF  
BEXAR; COUNTY OF BURLESON;  
COUNTY OF BURNET; COUNTY OF  
CAMERON; COUNTY OF CASS;  
COUNTY OF COOKE; COUNTY OF  
CORYELL; COUNTY OF DALLAS;  
COUNTY OF DELTA; COUNTY OF  
DIMMIT; COUNTY OF ECTOR;  
COUNTY OF EL PASO; COUNTY OF  
FALLS; COUNTY OF FANNIN; COUNTY  
OF FREESTONE; COUNTY OF  
GRAYSON; COUNTY OF HARRISON;  
COUNTY OF HIDALGO; COUNTY OF  
HOPKINS; COUNTY OF HOUSTON;  
COUNTY OF KENDALL; COUNTY OF  
KERR; COUNTY OF LIBERTY; COUNTY  
OF LIMESTONE; COUNTY OF MARION;  
COUNTY OF MCMULLEN; COUNTY OF  
MILAM; COUNTY OF NACOGDOCHES;  
COUNTY OF NUECES; NUECES  
COUNTY HOSPITAL DISTRICT;  
COUNTY OF ORANGE; COUNTY OF  
PANOLA; COUNTY OF PARKER;  
COUNTY OF POTTER; COUNTY OF  
ROBERTSON; COUNTY OF SAN  
PATRICIO; COUNTY OF SHELBY;  
COUNTY OF TRAVIS; COUNTY OF  
TRINITY; COUNTY OF VAN ZANDT;  
COUNTY OF WALLER; COUNTY OF  
WILLIAMSON; COUNTY OF WOOD;  
JOHNSON COUNTY; CACHE COUNTY,  
UTAH; RICH COUNTY, UTAH; DAVIS**

COUNTY; GRAND COUNTY; IRON  
COUNTY; MILLARD COUNTY; SALT  
LAKE COUNTY; SAN JUAN COUNTY;  
SANPETE COUNTY; SEVIER COUNTY;  
JUAB COUNTY; EMERY COUNTY;  
WAYNE COUNTY; PIUTE COUNTY;  
SUMMIT COUNTY, UTAH; TOOELE  
COUNTY, UTAH; UINTAH COUNTY,  
UTAH; DUSCESNE COUNTY, UTAH;  
DAGGETT COUNTY, UTAH; TRI-  
COUNTY HEALTH DEPARTMENT;  
WASATCH COUNTY, UTAH;  
WASHINGTON COUNTY, UTAH; KANE  
COUNTY, UTAH; BEAVER COUNTY,  
UTAH; GARFIELD COUNTY, UTAH;  
WEBER COUNTY, UTAH; CITY OF  
MARTINSVILLE, VIRGINIA;  
DINWIDDIE COUNTY, VIRGINIA; THE  
COUNTY BOARD OF ARLINGTON  
COUNTY, VIRGINIA; MECKLENBURG  
COUNTY; BROOKE COUNTY  
COMMISSION; HANCOCK COUNTY  
COMMISSION; HARRISON COUNTY  
COMMISSION; LEWIS COUNTY  
COMMISSION; MARSHALL COUNTY  
COMMISSION; OHIO COUNTY  
COMMISSION; TYLER COUNTY  
COMMISSION; WETZEL COUNTY  
COMMISSION; THE COUNTY  
COMMISSION OF MASON COUNTY;  
THE COUNTY COMMISSION OF  
BARBOUR COUNTY; MAYOR CHRIS  
TATUM on behalf of THE VILLAGE OF  
BARBOURSVILLE; THE COUNTY  
COMMISSION OF TAYLOR COUNTY;  
THE COUNTY COMMISSION OF  
WEBSTER COUNTY; MAYOR DON E.  
MCCOURT, on behalf of the TOWN OF  
ADDISON a/k/a THE TOWN OF  
WEBSTER SPRINGS; MAYOR PEGGY  
KNOTTS BARNEY, on behalf of the CITY  
OF GRAFTON; MAYOR PHILIP  
BOWERS, on behalf of the CITY OF  
PHILIPPI; MONONGALIA COUNTY  
COMMISSION; MARION COUNTY  
COMMISSION; DODDRIDGE COUNTY

COMMISSION; RANDOLPH COUNTY  
COMMISSION; UPSHUR COUNTY  
COMMISSION; ROANE COUNTY  
COMMISSION; THE CITY OF SPENCER;  
JACKSON COUNTY COMMISSION; THE  
CITY OF RIPLEY; THE TOWN OF  
RAVENSWOOD; WOOD COUNTY  
COMMISSION; THE CITY OF  
WILLIAMSTOWN; WIRT COUNTY  
COMMISSION; THE TOWN OF  
ELIZABETH; PLEASANTS COUNTY  
COMMISSION; CITY OF ST. MARY'S;  
RITCHIE COUNTY COMMISSION;  
TOWN OF HARRISVILLE; WEST  
VOLUSIA HOSPITAL AUTHORITY;  
THOMAS HICKEY; I-KARE  
TREATMENT CENTER, LLC; MARY  
TILLEY; BROWARD COUNTY,  
FLORIDA; CABELL COUNTY  
COMMISSION; CITY OF HUNTINGTON,  
WEST VIRGINIA; CITY OF CHICAGO;  
CITY OF CLEVELAND; COUNTY OF  
SUMMIT, OHIO; SUMMIT COUNTY  
PUBLIC HEALTH; THE CITY OF  
AKRON; STATE OF OHIO, *ex rel.*  
PROSECUTING ATTORNEY FOR  
SUMMIT COUNTY, SHERRI BEVAN  
WALSH; THE DIRECTOR OF LAW FOR  
THE CITY OF AKRON, EVE BELFANCE;  
COUNTY OF MONROE; THE COUNTY  
OF CUYAHOGA, OHIO; STATE OF  
OHIO, *ex rel.* PROSECUTING  
ATTORNEY OF CUYAHOGA COUNTY,  
MICHAEL C. O'MALLEY; ALEXANDER  
CITY, ALABAMA; CITY OF OXFORD,  
ALABAMA; RUSSELL COUNTY,  
ALABAMA; CITY OF SANTA ANA; THE  
PEOPLE OF THE STATE OF  
CALIFORNIA, by and through SANTA  
ANA CITY ATTORNEY SONIA R.  
CARVALHO; CITY OF FULLERTON;  
THE PEOPLE OF THE STATE OF  
CALIFORNIA by and through  
FULLERTON CITY ATTORNEY  
RICHARD D. JONES; CITY OF IRVINE;  
THE PEOPLE OF THE STATE OF



**CALIFORNIA by and through IRVINE  
CITY ATTORNEY JEFFREY  
MELCHING; CITY OF SAN CLEMENTE;  
THE PEOPLE OF THE STATE OF  
CALIFORNIA by and through SAN  
CLEMENTE CITY ATTORNEY SCOTT  
C. SMITH; CITY OF COSTA MESA; THE  
PEOPLE OF THE STATE OF  
CALIFORNIA by and through COSTA  
MESA CITY ATTORNEY KIMBERLY  
HALL BARLOW; CITY OF  
WESTMINSTER; THE PEOPLE OF THE  
STATE OF CALIFORNIA by and through  
WESTMINSTER CITY ATTORNEY  
RICHARD D. JONES; COUNTY OF  
ALAMEDA; THE PEOPLE OF THE  
STATE OF CALIFORNIA by and through  
COUNTY COUNSEL DONNA ZIEGLER;  
CITY OF OCALA, FLORIDA; COUNTY  
OF KAUA'I, a political subdivision of the  
State of Hawaii, for themselves individually,  
and on behalf of all similarly situated  
persons, and on behalf of the general public,  
as a class; HOWARD COUNTY;  
CHARTER TOWNSHIP OF HARRISON;  
CITY OF STERLING HEIGHTS; CITY OF  
WARREN; CITY OF COON RAPIDS,  
MINNESOTA; ST. FRANCOIS COUNTY;  
COUNTY OF BURLINGTON, NJ;  
TOWNSHIP OF BRICK; CITY OF  
AMSTERDAM; CITY OF AUBURN; CITY  
OF POUGHKEEPSIE; CITY OF  
ROCHESTER; CITY OF SARATOGA  
SPRINGS; CITY OF OGDENSBURG;  
BOARD OF COUNTY COMMISSIONERS  
OF ATOKA COUNTY; BOARD OF  
COUNTY COMMISSIONERS OF CADDO  
COUNTY; BOARD OF COUNTY  
COMMISSIONERS OF CIMARRON  
COUNTY; BOARD OF COUNTY  
COMMISSIONERS OF GRADY COUNTY;  
BOARD OF COUNTY COMMISSIONERS  
OF HASKELL COUNTY; BOARD OF  
COUNTY COMMISSIONERS OF  
JEFFERSON COUNTY; BOARD OF  
COUNTY COMMISSIONERS OF**

**LATIMER COUNTY; CITY OF JENKS;  
CITY OF SEMINOLE; CITY OF  
SHAWNEE; CITY OF ALLENTOWN,  
PENNSYLVANIA; COUNTY OF DUVAL;  
COUNTY OF KLEBERG; COUNTY OF  
JIM HOGG; ELLIS COUNTY;  
ROCKWALL COUNTY; CHARLOTTE  
COUNTY; CITY OF EMPORIA; CITY OF  
FREDERICKSBURG; CITY OF  
PORTSMOUTH; CITY OF RADFORD;  
CITY OF WAYNESBORO; CULPEPER  
COUNTY; CUMBERLAND COUNTY;  
GREENSVILLE COUNTY; LOUDOUN  
COUNTY; PATRICK COUNTY; PRINCE  
GEORGE COUNTY; SHENANDOAH  
COUNTY; WISE COUNTY BOARD OF  
SUPERVISORS; THE DCH HEALTH  
CARE AUTHORITY; THE  
HEALTHCARE AUTHORITY FOR  
BAPTIST HEALTH, an affiliate of UAB  
HEALTH SYSTEM; MEDICAL WEST  
HOSPITAL AUTHORITY, an affiliate of  
UAB Health System; EVERGREEN  
MEDICAL CENTER, LLC; GILLIARD  
HEALTH SERVICES, INC.;  
CRESTWOOD HEALTHCARE, L.P.;  
TRIAD OF ALABAMA, LLC; QHG OF  
ENTERPRISE, INC.; AFFINITY  
HOSPITAL, LLC; GADSDEN REGIONAL  
MEDICAL CENTER, LLC; FOLEY  
HOSPITAL CORPORATION; THE  
HEALTH CARE AUTHORITY OF  
CLARKE COUNTY, ALABAMA; BBH  
PBMC, LLC; BBH, WBMC, LLC; BBH  
SBMC, LLC; BBH CBMC, LLC; BBH  
BMC, LLC; TUCSON MEDICAL  
CENTER; TAKOMA REGIONAL  
HOSPITAL, INC. f/k/a TAKOMA  
HOSPITAL, INC.; AMISUB (SFH), INC.;  
BAPTIST WOMENS HEALTH CENTER,  
LLC; CAMPBELL COUNTY HMA, LLC;  
CLARKSVILLE HEALTH SYSTEM, G.P.;  
CLEVELAND TENNESSEE HOSPITAL  
COMPANY, LLC; COCKE COUNTY  
HMA, LLC; DICKENSON COMMUNITY  
HOSPITAL; HAWKINS COUNTY**

MEMORIAL HOSPITAL; JEFFERSON  
COUNTY HMA, LLC; JOHNSTON  
MEMORIAL HOSPITAL, INC.;  
LEBANON HMA, INC.; LEXINGTON  
HOSPITAL CORPORATION; METRO  
KNOXVILLE HMA, LLC; MOUNTAIN  
STATES HEALTH ALLIANCE f/k/a  
JOHNSON CITY MEDICAL CENTER  
HOSPITAL, INC.; NORTHEAST  
TENNESSEE COMMUNITY HEALTH  
CENTERS, INC.; NORTON COMMUNITY  
HOSPITAL; SAINT FRANCIS  
HOSPITAL--BARTLETT, INC. f/k/a  
TENET HEALTH SYSTEM;  
SHELBYVILLE HOSPITAL COMPANY,  
LLC f/k/a SHELBYVILLE HOSPITAL  
CORPORATION; SMYTH COUNTY  
COMMUNITY HOSPITAL;  
TULLAHOMA HMA, LLC f/k/a  
TULLAHOMA HMA, INC.; WELLMONT  
HEALTH SYSTEM f/k/a BRMC/HVMC,  
INC.; KINGMAN HOSPITAL, INC.;  
ARIZONA SPINE AND JOINT HOSPITAL  
LLC; BULLHEAD CITY HOSPITAL  
CORPORATION; CARONDELET ST.  
JOSEPH'S HOSPITAL; HOLY CROSS  
HOSPITAL, INC.; HOSPITAL  
DEVELOPMENT OF WEST PHOENIX,  
INC.; NORTHWEST HOSPITAL, LLC;  
ORO VALLEY HOSPITAL, LLC; OASIS  
HOSPITAL; ORTHOPEDIC AND  
SURGICAL SPECIALTY COMPANY,  
LLC; ST. MARY'S HOSPITAL OF  
TUCSON; VHS ACQUISITION  
SUBSIDIARY NUMBER 1, INC.; VHS  
ARROWHEAD, INC.; WEST VIRGINIA  
UNIVERSITY HOSPITALS INC.;  
APPALACHIAN REGIONAL  
HEALTHCARE, INC.; BLUEFIELD  
HOSPITAL COMPANY, LLC;  
CHARLESTON AREA MEDICAL  
CENTER, INC.; DAVIS MEMORIAL  
HOSPITAL; BROADDUS HOSPITAL  
ASSOCIATION; WEBSTER COUNTY  
MEMORIAL HOSPITAL, INC.;  
GRAFTON CITY HOSPITAL, INC.;

COMMUNITY HEALTH ASSOCIATION  
d/b/a JACKSON GENERAL HOSPITAL;  
GRANT MEMORIAL HOSPITAL;  
GREENBRIER VMC, LLC;  
MONONGALIA COUNTY GENERAL  
HOSPITAL COMPANY; PRESTON  
MEMORIAL HOSPITAL  
CORPORATION; PRINCETON  
COMMUNITY HOSPITAL  
ASSOCIATION, INC.; STONEWALL  
JACKSON MEMORIAL HOSPITAL  
COMPANY; OAK HILL HOSPITAL  
CORPORATION d/b/a PLATEAU  
MEDICAL CENTER; CAMDEN-CLARK  
MEMORIAL HOSPITAL  
CORPORATION; THE CHARLES TOWN  
GENERAL HOSPITAL; CITY HOSPITAL,  
INC.; POTOMAC VALLEY HOSPITAL  
OF W. VA., INC.; REYNOLDS  
MEMORIAL HOSPITAL INC.; ST.  
JOSEPH'S HOSPITAL OF  
BUCKHANNON, INC.; WETZEL  
COUNTY HOSPITAL ASSOCIATION;  
WILLIAMSON MEMORIAL HOSPITAL,  
LLC; BRAXTON COUNTY MEMORIAL  
HOSPITAL, INC.; UNITED HOSPITAL  
CENTER, INC.; BOWLING GREEN-  
WARREN COMMUNITY HOSPITAL  
CORPORATION; THE MEDICAL  
CENTER AT CLINTON COUNTY, INC.;  
THE MEDICAL CENTER AT FRANKLIN,  
INC.; ARH TUG VALLEY HEALTH  
SERVICES INC. f/k/a HIGHLANDS  
HOSPITAL CORPORATION; BAPTIST  
HEALTHCARE SYSTEM, INC.; BAPTIST  
HEALTH MADISONVILLE, INC.;  
BAPTIST HEALTH RICHMOND, INC.;  
GRAYSON COUNTY HOSPITAL  
FOUNDATION, INC.; THE HARRISON  
MEMORIAL HOSPITAL, INC.; SAINT  
ELIZABETH MEDICAL CENTER, INC.;  
ST. CLAIRE MEDICAL CENTER, INC.;  
TAYLOR COUNTY HOSPITAL  
DISTRICT HEALTH FACILITIES  
CORPORATION; WEST BOCA  
MEDICAL CENTER, INC.; GARY CARR;

**FREDRICK HILL; FRANCISCO PEREZ;  
AFSCME DISTRICT COUNCIL 33  
HEALTH & WELFARE FUND; AFSCME  
DISTRICT COUNCIL 47 HEALTH &  
WELFARE FUND; BRICKLAYERS AND  
ALLIED CRAFTWORKERS LOCAL  
UNION NO. 1 OF PA/DEHEALTH AND  
WELFARE FUND; CARPENTERS  
HEALTH & WELFARE OF  
PHILADELPHIA & VICINITY;  
SOUTHEASTERN PENNSYLVANIA  
TRANSPORTATION AUTHORITY;  
INTERNATIONAL BROTHERHOOD OF  
ELECTRICAL WORKERS LOCAL 98  
HEALTH & WELFARE FUND;  
INTERNATIONAL BROTHERHOOD OF  
ELECTRICAL WORKERS LOCAL 89  
SOUND AND COMMUNICATION  
HEALTH & WELFARE FUND;  
INTERNATIONAL BROTHERHOOD OF  
ELECTRICAL WORKERS LOCAL 728  
FAMILY HEALTHCARE PLAN;  
INTERNATIONAL UNION OF PAINTERS  
AND ALLIED TRADES, DISTRICT  
COUNCIL NO. 21 WELFARE FUND;  
IRON WORKERS DISTRICT COUNCIL  
OF PHILADELPHIA AND VICINITY,  
BENEFIT FUND; PHILADELPHIA  
FEDERATION OF TEACHERS HEALTH  
AND WELFARE FUND; THE TRUSTEES  
OF THE UNITE HERE LOCAL 634  
HEALTH & WELFARE FUND; UFCW  
LOCAL 23 AND EMPLOYERS HEALTH  
FUND; WESTERN PENNSYLVANIA  
ELECTRICAL EMPLOYEES  
INSURANCE TRUST FUND; DALLAS  
COUNTY HOSPITAL DISTRICT D/B/A  
PARKLAND HEALTH & HOSPITAL  
SYSTEM; PALO PINTO COUNTY  
HOSPITAL DISTRICT a/k/a PALO PINTO  
GENERAL HOSPITAL; GUADALUPE  
VALLEY HOSPITAL a/k/a GUADALUPE  
REGIONAL MEDICAL CENTER; VHS  
SAN ANTONIO PARTNERS, LLC d/b/a  
BAPTIST MEDICAL CENTER, MISSION  
TRAIL BAPTIST HOSPITAL, NORTH**

**CENTRAL BAPTIST HOSPITAL,  
NORTHEAST BAPTIST HOSPITAL, AND  
ST. LUKE'S BAPTIST HOSPITAL;  
NACOGDOCHES MEDICAL CENTER;  
RESOLUTE HOSPITAL COMPANY, LLC  
d/b/a RESOLUTE HEALTH; THE  
HOSPITALS OF PROVIDENCE EAST;  
CAMPUS; THE HOSPITALS OF  
PROVIDENCE MEMORIAL CAMPUS;  
THE HOSPITALS OF PROVIDENCE;  
SIERRA CAMPUS; THE HOSPITALS OF  
PROVIDENCE TRANSMOUNTAIN  
CAMPUS; VHS BROWNSVILLE  
HOSPITAL COMPANY, LLC d/b/a  
VALLEY BAPTIST MEDICAL CENTER -  
BROWNSVILLE; VHS HARLINGEN  
HOSPITAL COMPANY, LLC d/b/a  
VALLEY BAPTIST MEDICAL CENTER;  
ARMC, L.P. d/b/a ABILENE REGIONAL  
MEDICAL CENTER; COLLEGE  
STATION HOSPITAL, LP; GRANBURY  
HOSPITAL CORPORATION d/b/a LAKE  
GRANBURY MEDICAL CENTER;  
NAVARRO HOSPITAL, L.P. d/b/a  
NAVARRO REGIONAL HOSPITAL;  
BROWNWOOD HOSPITAL, L.P. d/b/a  
BROWNWOOD REGIONAL MEDICAL  
CENTER; VICTORIA OF TEXAS, L.P.  
d/b/a DETAR HOSPITAL; NAVARRO  
AND DETAR HOSPITAL NORTH;  
LAREDO TEXAS HOSPITAL COMPANY,  
L.P. d/b/a LAREDO MEDICAL CENTER;  
SAN ANGELO HOSPITAL, L.P. d/b/a SAN  
ANGELO COMMUNITY MEDICAL  
CENTER; CEDAR PARK HEALTH  
SYSTEM, L.P. d/b/a CEDAR PARK  
REGIONAL MEDICAL CENTER; NHCI  
OF HILLSBORO, INC. d/b/a HILL  
REGIONAL HOSPITAL; LONGVIEW  
MEDICAL CENTER, L.P. d/b/a  
LONGVIEW REGIONAL MEDICAL  
CENTER; PINEY WOODS  
HEALTHCARE SYSTEM, L.P. d/b/a  
WOODLAND HEIGHTS MEDICAL  
CENTER; FIRE AND POLICE  
RETIREMENT HEALTH CARE FUND,**

SAN ANTONIO; ALICIA SIMONSON;  
ALYSSA LYLE; A.M.H.; AMANDA  
GIBSON; AMANDA MUFFLEY; AMY  
SHEPARD; ANDREW G. RILING;  
BEVERLY RILING; ANGELA CHERRY;  
APRIL BERZINSKI; ARACYA  
JOHNSON; BILLIE IVIE; BOBBIE LOU  
MOORE; BRANDI BRUMBARGER;  
BRITTANY FLACH; CAROL LIVELY;  
CAROLINE VONCANNON; CHOLE  
PAUL; CHRISTINA DELANCEY;  
CLEVELAND BANKERS AND  
TEAMSTERS HEALTH AND WELFARE  
FUND; PIPE FITTERS LOCAL UNION  
NO. 120 INSURANCE FUND; COREY  
MEANS; COURTNEY HERRING;  
DARREN FLANAGAN; ELENA  
FLANAGAN; DEBORAH DIXON; DERIC  
REES; CEONDA REES; DESIREE  
CARLSON; DESIRAE WARREN;  
ELIZABETH KOMMER; ERIN DOYLE;  
ESPERENZA ELLIS; FARRAH  
WILLIAMS; GENA PATTERSON;  
GLORIA CRUZ; HEATHER GOSS;  
HEATHER PUCKETT; JACQUELYNN  
MARTINEZ; JAMIE JOHNSON; JAMIEE  
GILSON; JENNI GOLDMAN; JENNIFER  
ARTZ; JENNIFER THOMAS; JENNY  
SCULLY; JESSICA COLLIER; JESSICA  
HAMPEL; JESSICA PERKINS; JESSICA  
RODRIGUEZ; JESSICA TAYLOR; JODI  
SHAFFER; JOHN DOE; KATHERINE  
WHITTINGTON; KAYLA SHOCKLEY;  
KIANA HUTCHINS; KIMBERLY  
MARTIN; KJELLSI MEINECKE; KRISTA  
GAUTHIER; ANGELA SAWYERS;  
JESSICA SPRINGBORN; KRYSTLE  
KIRK; LORI TAYLOR; MARIA ORTIZ;  
MARIJHA HAMAWI; MEGHAN LARA;  
MECHELLE GAUTHIER; MELANIE  
MASSEY; MELBA ALEXANDER;  
MELISSA AMBROSIO; MUSETTE  
CHANCEY; NAOMI WRIGHT; NICHOLE  
TINDALL; NICOLE TUTTLE; NIOLA  
LECHUGA; PAULA WATSON; PENNY  
MARTIN; QUINCY WEATHERWAX;

**RACHEL WOOD; REANNAN HOWELL;  
REBECCA GOFORTH; ROXIE  
WHITLEY; CHRIS DENSON; DIANE  
DENSON; JAMES HOLLAND; TERI  
HOLLAND; SALLY PETERSON;  
SAMANTHA DEMARO; SAMANTHA  
MCANANY; SANDRA ATKINSON;  
SHANNON HUNT; SHELBY L. BRANT;  
SHELLEY WHITTAKER; SHILO  
SHEWMAKE; TAYLOR BROOKE  
UNDERWOOD; TYLER M. ROACH;  
WALTER SALMONS; VIRGINIA  
SALMONS; WAIKEISHA RICHARDSON;  
WENDY STEWART; W.E., by and through  
her guardian and next friend, PAMELA  
OSBORNE; PAMELA OSBORNE;  
AMANDA HANLON; AMY GARDNER,**

**Defendants.**

**MOTION FOR A PRELIMINARY INJUNCTION**

Purdue Pharma L.P. (“**Purdue Pharma**”) and certain affiliated debtors who are plaintiffs in the above-captioned adversary proceeding, as debtors and debtors in possession (collectively, “**Debtors**”), respectfully represent as follows in support of this motion (“**Motion**”) and in support of their Complaint for Injunctive Relief (“**Complaint**”), seeking entry of a preliminary injunction in substantially the form annexed hereto as **Exhibit A** (“**Proposed Order**”):

**RELIEF REQUESTED**

1. By this Motion, pursuant to section 105 of title 11 of the United States Code (“**Bankruptcy Code**”) and Rule 7065 of the Federal Rules of Bankruptcy Procedure (“**Bankruptcy Rules**”), the Debtors request entry of a preliminary injunction to: (i) enjoin the governmental defendants in this adversary proceeding (“**Governmental Defendants**”) from the commencement or continuation of their active judicial, administrative, or other actions or proceedings against the Debtors that were or could have been commenced before the



commencement of this case (“**Governmental Actions**”), which are identified in Exhibit A to this Complaint, as well as the commencement or continuation of any other actions against the Debtors alleging substantially similar facts or causes of action as those alleged in the Governmental Actions, if not otherwise subject to the automatic stay imposed by section 362 of the Bankruptcy Code, for 270 days from entry of the injunction; and (ii) enjoin the Governmental Defendants and the private defendants (“**Private Defendants**”) in this adversary proceeding from the commencement or continuation of their active judicial, administrative, or other actions or proceedings, identified in Exhibit B to this Complaint, and the commencement or continuation of other actions alleging substantially similar facts or causes of action as those alleged in the actions identified in Exhibit A or Exhibit B to the Complaint, against former or current (a) owners (including any trusts and their respective trustees and beneficiaries), (b) directors, (c) officers, (d) employees, and (e) associated entities of the Debtors that were or could have been commenced before the commencement of the case (“**Related Parties**,” and the claims against them described in this paragraph, the “**Related-Party Claims**”), if not otherwise subject to the automatic stay imposed by section 362 of the Bankruptcy Code, for 270 days from entry of the injunction. The Debtors also voluntarily request that the Court enjoin the Debtors from engaging in certain conduct with respect to promotion of their opioid medications, as reflected in Proposed Order annexed hereto (“**Voluntary Injunction**”). Finally, the Debtors request that this Court not require the Debtors to provide any security in connection with this preliminary injunction as permitted under Rule 7065 of the Bankruptcy Rules. *See* Fed. R. Bankr. P. 7065 (“Rule 65 . . . applies in adversary proceedings, except that a temporary restraining order or preliminary injunction may be issued on application of a debtor, trustee, or debtor in possession without compliance with Rule 65(c).”).

### **JURISDICTION AND VENUE**

2. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated February 1, 2012. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

### **BASIS FOR REQUESTED RELIEF**

3. The Debtors are filing contemporaneously herewith: (i) the Complaint; (ii) a declaration of Jesse DelConte in support of the Motion; (iii) a declaration of John James O'Connell III in support of the Motion; and (iv) a memorandum of law in support of the Motion, all of which provide details of the factual and legal bases for the requested relief.

### **RESERVATION OF RIGHTS**

4. Nothing contained herein is intended to be or shall be construed as (i) an admission as to the validity of any claim against the Debtors, or (ii) a waiver of the Debtors' or any appropriate party-in-interest's rights to dispute any claim. The Debtors expressly reserve their right to move in the future to enjoin the prosecution of any other lawsuit against them or the Related Parties. The Debtors also expressly reserve their right to assert that any action against the Debtors or the Related Parties is subject to 11 U.S.C. § 362(a).

### **NOTICE**

5. The Debtors will serve a copy of this Motion and the accompanying memorandum of law and declarations on the Governmental Defendants and the Private Defendants. In light of the nature of the relief requested herein, the Debtors submit that no other or further notice need be provided.

**NO PREVIOUS REQUEST**

6. No previous request for the relief sought herein has been made by the Debtors to this Court or any other court.

WHEREFORE, the Debtors respectfully request entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: September 18, 2019  
New York, New York

By: /s/ Benjamin S. Kaminetzky  
DAVIS POLK & WARDWELL LLP  
450 Lexington Avenue  
New York, New York 10017  
Telephone: (212) 450-4000  
Facsimile: (212) 701-5800  
Marshall S. Huebner  
Benjamin S. Kaminetzky  
James I. McClammy  
Marc J. Tobak  
Gerard X. McCarthy

*Proposed Counsel to the Debtors  
and Debtors in Possession*

**Exhibit A**

**Proposed Order**

DAVIS POLK & WARDWELL LLP  
450 Lexington Avenue  
New York, New York 10017  
Telephone: (212) 450-4000  
Facsimile: (212) 701-5800  
Marshall S. Huebner  
Benjamin S. Kaminetzky  
James I. McClammy  
Marc J. Tobak  
Gerard X. McCarthy

*Proposed Counsel to the Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., et al.,  
  
Debtors.<sup>1</sup>**

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

**Plaintiffs,**

**v.**

**COMMONWEALTH OF MASSACHUSETTS, et al.,  
  
Defendants.**

**Chapter 11**

**Case No. 19-23649 (RDD)**

**(Jointly Administered)**

**Adv. Pro. No. 19-08289 (RDD)**

**[PROPOSED] ORDER PURSUANT TO 11 U.S.C. § 105(a) GRANTING  
MOTION FOR A PRELIMINARY INJUNCTION**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Upon the motion, dated September 18, 2019 (“**Motion**”), of Purdue Pharma L.P. and certain affiliated debtors, as debtors and debtors in possession (collectively, “**Debtors**”), which are plaintiffs in this adversary proceeding, for an order pursuant to section § 105(a) of title 11 of the United States Code (“**Bankruptcy Code**”) and Rule 7065 of the Federal Rules of Bankruptcy Procedure (“**Bankruptcy Rules**”), to: (i) enjoin the governmental defendants in this adversary proceeding (“**Governmental Defendants**”) from the commencement or continuation of their active judicial, administrative, or other actions or proceedings against the Debtors that were or could have been commenced before the commencement of the case (“**Governmental Actions**”), which are identified in Exhibit A to the Complaint, as well as the commencement or continuation of any other actions against the Debtors alleging substantially similar facts or causes of action as those alleged in the Governmental Actions, for 270 days from entry of the injunction; and (ii) enjoin the Governmental Defendants and the private defendants (“**Private Defendants**”) in this adversary proceeding from the commencement or continuation of their active judicial, administrative, or other actions or proceedings, identified in Exhibit B to the Complaint, and the commencement or continuation of other actions alleging substantially similar facts or causes of action as those alleged in the actions identified in Exhibit A or Exhibit B to the Complaint, against former or current (a) owners (including any trusts and their respective trustees and beneficiaries), (b) directors, (c) officers, (d) employees, and (e) associated entities of the Debtors that were or could have been commenced before the commencement of the case (“**Related Parties**,” and the claims against them described in this paragraph, the “**Related-Party Claims**”) for 270 days from entry of the injunction; and the Court having jurisdiction to decide the Motion and the relief requested therein under 28 U.S.C. §§ 157 and 1334; and there being due and sufficient notice of the Motion; and the Court having reviewed the Complaint, the Motion, the

Debtors' brief in support of the Motion, the declarations in support of the Motion, and other evidence and argument submitted by the Debtors in support thereof and upon the record of the hearing held by the Court on the Motion on October 11, 2019; the Court finds and concludes as follows:

(a) The Plaintiffs in these adversary proceedings are the Debtors. The Defendants in this adversary proceeding are the Governmental Defendants and the Private Defendants, which are listed in the caption to the Complaint and in the "Underlying Plaintiffs" column of Exhibit A and Exhibit B to the Complaint. The Defendants in this adversary proceeding are all plaintiffs in judicial, administrative, or other actions or proceedings that seek to hold the Debtors and/or the Related Parties liable in connection with claims and/or causes of action arising out of or otherwise related to the Debtors' prescription opioid business.

(b) The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

(c) The Debtors have demonstrated that the continuation of the active litigation against them and the Related Parties, identified in Exhibits A and B to the Complaint, respectively, would result in irreparable harm to the Debtors and their reorganization, including by subjecting the Debtors to substantial, but ultimately unproductive, costs, materially lessening the Debtors' ability to maximize value and recovery to the public and potential estate stakeholders, including the Defendants in this adversary proceeding. Further, continued prosecution of those actions would significantly distract the Debtors from vital bankruptcy proceedings by requiring them to participate in or otherwise address discovery, other pretrial proceedings, and/or trials, all

to the substantial detriment of the Debtors and their estates. Moreover, the Debtors have demonstrated that any harm to the Defendants in this adversary proceeding from a stay is outweighed by the irreparable harm that the Debtors will suffer in the absence of preliminary injunctive relief.

(d) Accordingly, this Court finds it appropriate to enter a preliminary injunction pursuant to section §§ 105 and 362(a) of the Bankruptcy Code and Rule 7065 of the Bankruptcy Rules.

(e) The legal and factual bases set forth in the Complaint, the Motion, the Brief, other supporting papers, and at the hearing establish just cause for the relief granted herein.

Based on these findings, it is hereby:

ORDERED, that the Governmental Defendants and the Private Defendants are prohibited and enjoined from (i) the commencement or continuation of their active judicial, administrative, or other actions or proceedings against the Debtors and Related Parties that were or could have been commenced before the commencement of the case under this title against the Debtors and the Related Parties arising from or in any way relating to the Debtors' prescription opioid business, including the actions reflected in the attached Exhibit A and Exhibit B, as well as (ii) from commencing or continuing any other actions against the Debtors or Related Parties alleging substantially similar facts or causes of action as those alleged in actions reflected in the attached Exhibit A and Exhibit B, for 270 days from entry of the injunction.

ORDERED, that the Debtors in these chapter 11 cases shall be subject to the Voluntary Injunction annexed hereto as Appendix 1.



ORDERED, that the Debtors need not give security in connection with this injunctive relief.

ORDERED, that this Order shall be promptly filed in the clerk's office and entered into the record.

ORDERED, that the Debtors are authorized to take all steps necessary or appropriate to carry out this Order.

ORDERED, that nothing in this Order shall prevent the Debtors from seeking a further extension of the requested injunction.

ORDERED, that if, while the preliminary injunction provided for in this Order is effective, either (i) any inactive litigation currently pending against the Debtors or Related Parties becomes active, or (ii) any new action is commenced against the Debtors or Related Parties (in either case, an "**Additional Action**"), then the Debtors may promptly serve the plaintiff or plaintiffs in such Additional Action ("**Applicable Plaintiff**") with a copy of the Complaint, the Motion, the Debtors' memorandum of law in support of the Motion, and this Order (the "**Service Documents**"). The Debtors shall file a notice of such service on the docket promptly after service. If the Applicable Plaintiff in such Additional Action does not file and serve an objection within seven (7) days of service of the Service Documents, the Court shall determine whether such Additional Action should be enjoined pursuant to this Order without further proceedings. If the Applicable Plaintiff files and serves an objection, the Debtors shall have the right to file and serve a response to the objection within seven (7) days of service of the objection, after which the Court shall determine whether such Additional Action should be enjoined pursuant to this Order without further proceedings.

ORDERED, that nothing in this Order shall affect or abrogate the automatic stay as to the Debtors under section 362.

ORDERED, that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: White Plains, New York

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THE HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE

**Appendix 1**

**Voluntary Injunction**

## **I. DEFINITIONS**

- A. “Cancer-Related Pain Care” shall mean care that provides relief from pain caused by active cancer or ongoing cancer related treatment.
- B. “Company” shall mean the Debtors as defined in these chapter 11 proceedings.
- C. “End-of-Life Care” shall mean care for persons with a terminal illness or at high risk for dying in the near future in hospice care, skilled nursing care, hospitals, long-term care settings, assisted living facilities, outpatient care, or at home.
- D. “Health Care Provider” shall mean any physician, nurse practitioner, physician assistant, dentist, pharmacist, podiatrist, nurse, or other person engaged in providing health care services and/or prescribing an Opioid and any medical facility, practice, hospital, clinic, or pharmacy engaged in providing health care services and/or prescribing an Opioid.
- E. “In-Kind Support” shall mean payment or assistance in the form of goods, commodities, services, or anything else of value.
- F. “Opioid(s)” shall mean all natural, semi-synthetic, or synthetic chemicals that stimulate opioid receptors on nerve cells in the body and brain.
- G. “Opioid Product(s)” shall mean all natural, semi-synthetic, or synthetic chemicals that stimulate opioid receptors on nerve cells in the body and brain, and that are approved by the U.S. Food & Drug Administration (FDA) and listed by the DEA as Schedule II or III drugs pursuant to the federal Controlled Substances Act (including but not limited to codeine, fentanyl, hydrocodone, hydromorphone, meperidine, methadone, morphine, oxycodone, oxymorphone, tapentadol, tramadol, and buprenorphine for the treatment of pain). The term “Opioid Products(s)” shall not mean (i) methadone, buprenorphine, and other substances when used exclusively to treat opioid or other substance use disorders, abuse, addiction, or overdose; (ii) raw materials and/or immediate precursors used in the manufacture or study of Opioids or Opioid Products, but only when such materials and/or immediate precursors are sold or marketed exclusively to DEA-licensed manufacturers or DEA-licensed researchers; or (iii) Opioid Products listed by the DEA as Schedule IV drugs pursuant to the federal Controlled Substances Act.
- H. “Promote,” “Promoting,” and “Promotion” shall mean the dissemination of marketing or advertising information or the use of marketing or advertising tactics by Company to a Health Care Provider or patient, the intent or effect of which is to induce prescription or purchase of Company Opioid Products by Health Care Providers.
- I. “Third Party” shall mean any person or entity other than Company or a government entity.
- J. “Treatment of Pain” shall mean the provision of therapeutic modalities to alleviate or reduce pain. “Treatment of Pain” shall not include the provision of any specific non-Opioid manufactured or sold by Company that is approved or cleared by the FDA to

treat pain, including but not limited to medical devices, acetaminophen, anesthetics, or aspirin, and other steroid or non-steroidal anti-inflammatory drugs.

- K. “Unbranded Information” shall mean any information regarding an Opioid, Opioid Product, or the Treatment of Pain that does not identify a specific product(s).

## **II. INJUNCTIVE RELIEF**

### **A. Ban on Promotion to Prescribers and Patients**

1. Company shall not engage in Promotion of Opioids or Opioid Products as defined in Section I, by:
  - a. Employing or contracting with sales representatives to Promote Opioids or Opioid Products to Health Care Providers or patients;
  - b. Using speakers, key opinion leaders, thought leaders, lecturers, and/or speaking events for Promotion of Opioids or Opioid Products;
  - c. Sponsoring, or otherwise providing financial support or In-Kind Support to medical education programs for the Promotion of Opioids or Opioid Products;
  - d. Creating, sponsoring, operating, controlling, or otherwise providing financial support or In-Kind Support to any website, network and/or social or other media account for the Promotion of Opioids or Opioid Products;
  - e. Creating, sponsoring, distributing, or otherwise providing financial support or In-Kind Support for materials Promoting Opioids or Opioid Products, including but not limited to brochures, newsletters, pamphlets, journals, books, and guides; and
  - f. Creating, sponsoring, or otherwise providing financial support or In-Kind Support for advertisements that Promote Opioids or Opioid Products, including but not limited to internet advertisements or similar content, and providing hyperlinks or otherwise directing internet traffic to advertisements.
2. Notwithstanding Section II.A.1 directly above, as well as Section II.C, Company may:
  - a. Maintain corporate websites;

- b. Maintain a website for any Opioid Product that contains principally the following content: the FDA-approved package inserts, dosage strengths, dosage forms, packaging configurations, medication guides, and labeling; a statement directing patients or caregivers to speak with a licensed Health Care Provider; Risk Evaluation and Mitigation Strategy (REMS) materials; and contact information to report an adverse event or product complaint;
- c. Provide information or support the provision of information as expressly required by law or any state or federal government agency with jurisdiction;
- d. Provide the following by mail, electronic mail, on or through the Company's corporate or product websites or through other electronic or digital methods: FDA-approved package insert, medication guide, approved labeling for Opioid Products, Risk Evaluation and Mitigation Strategy materials, or other prescribing information for Opioid Products that are published by a state or federal government agency with jurisdiction;
- e. Provide scientific and/or medical information in response to an unsolicited request by a Health Care Provider concerning either on-label or off-label uses of Opioid Products;
- f. Provide a response to any unsolicited question or request from a patient or caregiver by (i) directing the patient or caregiver to the FDA-approved labeling and reviewing the full prescribing information with the patient as relevant to their inquiry, and, to the extent the question cannot be answered solely by reference to a specific provision of the FDA-approved labeling, providing a response that is truthful, balanced, nonmisleading and nonpromotional; (ii) recommending that the patient or caregiver speak with a licensed Health Care Provider without naming any specific provider or healthcare institution; (iii) directing the patient or caregiver to speak with their insurance carrier regarding coverage of an Opioid Product;
- g. Provide information to a payor, formulary committee, or other similar entity with knowledge and expertise in the area of health care economic analysis concerning the cost or availability of a Purdue Opioid Product, including the costs compared to the cost of an Opioid Product manufactured or distributed by another company. Such information may include information about the stocking of the Opioid Product; product attributes of the Opioid Product as described in the FDA-approved labeling; the tier designation of the Opioid Product within the formulary or drug list; applicable prescribing guidelines, pathways, and protocols, including step-edits for the Opioid Product; restrictions; and/or prior

authorization status concerning an Opioid Product. All information provided shall be consistent with the FDA-approved labeling;

- h. Provide information to a payor, formulary committee, or other similar entity with responses to unsolicited requests for scientific and medical information that are truthful, balanced, nonmisleading and nonpromotional;
  - i. Sponsor or provide financial support or In-Kind Support for an accredited or approved continuing medical education program required by either an FDA-approved Risk Evaluation and Mitigation Strategy program or other federal or state law or regulation through an independent Third Party, which shall be responsible for determining the program's content without the participation of Company; and
  - j. Provide Unbranded Information in connection with managing pain in End-of-Life Care, and/or Cancer-Related Pain Care relating to: the use of Opioids for the Treatment of Pain, as long as the Unbranded Information identifies Company as the source of the information.
- 3. For the avoidance of doubt, nothing in this Injunction shall be construed or used to prohibit Company in any way whatsoever from taking legal or factual positions in litigation, investigations, or other legal or administrative proceedings or exercising its right to make public statements or respond to media reports.
  - 4. To the extent that Company engages in conduct permitted by Section II.A.2 above, Company shall do so in a manner that is truthful, not misleading, accurate, and not deceptive.

**B. No Financial Reward or Discipline Based on Volume of Opioid Sales**

- 1. Company shall not compensate its sales and marketing employees with compensation agreements or packages based on or tied to the sales and marketing employees' sales volume, sales goals, or sales quotas for Opioid Products.
- 2. Company shall not offer or pay any remuneration, directly or through a Third Party, to or from any person in return for the prescribing, sale, use or distribution of Opioid Product. For the avoidance of doubt, this shall not include the provision of rebates, chargebacks, and/or savings cards.

**C. Ban on Funding/Grants to Third Parties**

- 1. Company shall not, either through Company or through Third Parties, provide financial support or In-Kind Support to any Third Party for Promotion of Opioids or Opioid Products, excluding financial support or In-Kind Support otherwise required by a federal or state agency.

2. Company shall not create, sponsor, provide financial support or In-Kind Support to or otherwise operate or control any medical society or patient advocacy group who are principally engaged in issues relating to Opioids or Opioid Products, excluding financial support (i) in the form of medical conference admission and/or attendance fees, (ii) of the National Center for Addiction Studies and Treatment adjunct to Oklahoma State University's Center for Health Sciences in Tulsa, Oklahoma or any similar institution and/or collaboration with Third Parties created in the future, including but not limited to institutions providing resources to treat, combat, or study addiction; or (iii) as required by court order, federal or state law, or regulation. For the avoidance of doubt, this shall not limit the Company's ability to provide medical, scientific, or pharmaceutical support or expertise to any medical society or patient advocacy group in a manner that is truthful, accurate, and not misleading or deceptive.

**D. General Terms**

1. To the extent that any provision conflicts with federal or state law or regulation, the requirements of the law or regulation will prevail.
2. Company shall not represent that any Opioid or Opioid Product has approvals, characteristics, uses, benefits, or qualities that they do not have.