

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.¹**

**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)

**NOTICE OF HEARING ON DEBTORS' MOTION FOR A PRELIMINARY
INJUNCTION AND ON DEBTORS' MOTION FOR ENTRY OF A SCHEDULING**

¹ 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.

**ORDER AND A PROTECTIVE ORDER IN CONNECTION WITH THE
PRELIMINARY INJUNCTION MOTION**

PLEASE TAKE NOTICE that on September 18, 2019, Purdue Pharma L.P. (“**Purdue Pharma**”) and certain other of the debtors (“**Debtors**”)² who are plaintiffs in the above-captioned adversary proceeding, filed the *Motion for a Preliminary Injunction* (the “**Preliminary Injunction Motion**”), pursuant to section 105 of title 11 of the United States Code (the “**Bankruptcy Code**”), seeking entry of an order staying, for 270 days, active cases brought by governmental entities against Debtors and active claims against certain related parties.

PLEASE TAKE NOTICE that on September 18, 2019, Debtors filed the *Motion for Entry of a Scheduling Order and a Protective Order in Connection with the Preliminary Injunction Motion* (the “**Preliminary Injunction Schedule Motion**”), pursuant to section 105 of the Bankruptcy Code, Rules 7026 and 9006 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 9006-1 of the Local Rules of the Bankruptcy Court for the Southern District of New York, seeking entry of a scheduling order and a protective order in connection with the Preliminary Injunction Motion.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Preliminary Injunction Motion and the Preliminary Injunction Schedule Motion has been scheduled by the Bankruptcy Court, as defined below, for **October 11, 2019 at 10:00 am (Prevailing Eastern Time)** (the “**Hearing**”), with such Hearing to be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District

² Although only certain of the Debtors (Purdue Pharma L.P.; Purdue Pharma Inc.; Purdue Pharma Manufacturing L.P.; Purdue Pharmaceuticals L.P.; Purdue Transdermal Technologies L.P.; Purdue Pharmaceutical Products L.P.; Purdue Pharma of Puerto Rico; Rhodes Pharmaceuticals L.P.; Rhodes Technologies; and Avrio Health L.P.) are defendants in the over 2,625 civil actions pending against the Debtors in various state and federal courts and other fora across the United States and its territories (the “**Pending Actions**”), the term “Debtors” is used for ease of reference.

of New York, 300 Quarropas St., White Plains, New York, NY 10601 (the “**Bankruptcy Court**”), in accordance with the Bankruptcy Court’s schedule.

PLEASE TAKE FURTHER NOTICE that Debtors have requested in the Preliminary Injunction Schedule Motion that any responses or objections to the Preliminary Injunction Motion and/or the Preliminary Injunction Schedule Motion shall (a) be made in writing; (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Rules of the Bankruptcy Court for the Southern District of New York, and all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York; (c) set forth the name of the objecting party, the basis for the objection, and the specific grounds thereof, and be filed with the Bankruptcy Court electronically by registered users of the Bankruptcy Court’s case filing systems in accordance with General Order M-399 (which is available on this Court’s website at <http://www.nysb.uscourts.gov>); and (d) be served so as to be actually received no later than **October 2, 2019 at 4:00 pm (Prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that Debtors’ replies in support of the Preliminary Injunction Motion and the Preliminary Injunction Schedule Motion shall (a) be made in writing; (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Rules of the Bankruptcy Court for the Southern District of New York, and all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York; (c) set forth the name of the objecting party, the basis for the objection, and the specific grounds thereof, and be filed with the Bankruptcy Court electronically by registered users of the Bankruptcy Court’s case filing systems in accordance with General Order M-399 (which is available on this Court’s website at <http://www.nysb.uscourts.gov>); and (d) be served so as to be actually received no later than **October 8, 2019 at 4:00 pm (Prevailing**

Eastern Time).

PLEASE TAKE FURTHER NOTICE that the deposition of Jesse DelConte will take place on **September 26, 2019 at 9:30 am (Prevailing Eastern Time)**, at 450 Lexington Avenue, New York, NY 10017, or at such other date and time, and at such other location, as agreed upon by the Parties.

PLEASE TAKE FURTHER NOTICE that the deposition of John James O'Connell III will take place on **September 27, 2019 at 9:30 am (Prevailing Eastern Time)**, at 450 Lexington Avenue, New York, NY 10017, or at such other date and time, and at such other location, as agreed upon by the Parties.

PLEASE TAKE FURTHER NOTICE that the relief requested may be granted without a hearing if no objection is timely filed and served with respect to the Preliminary Injunction Motion and/or the Preliminary Injunction Schedule Motion in accordance with these procedures.

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing. The Debtors will file an agenda before the Hearing, which may modify or supplement the Preliminary Injunction Motion and the Preliminary Injunction Schedule Motion to be heard at the Hearing.

PLEASE TAKE FURTHER NOTICE that a copy of the Preliminary Injunction Motion, Preliminary Injunction Schedule Motion, and related papers may be obtained free of charge by visiting the website of Prime Clerk LLC at <https://restructuring.primeclerk.com/purduepharma>. You may also obtain copies of any

pleadings by visiting the Court's website at <https://www.nysb.uscourts.gov> in accordance with
the procedures and fees set forth therein.

Dated: September 18, 2019
New York, New York

/s/ Benjamin S. Kaminetzky
DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
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