

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

IN RE: NATIONAL PRESCRIPTION	)	CASE NO. 1:17-MD-2804
OPIATE LITIGATION	)	
	)	SPECIAL MASTER COHEN
THIS DOCUMENT RELATES TO:	)	
<i>“PBM Bellwether Cases”</i>	)	
	)	<u>RULING REGARDING DEPOSITION</u>
	)	<u>OF LAURA RANDA</u>

This MDL Court has selected two cases for bellwether trials against the PBM defendants: *City of Rochester v. Purdue Pharma, L.P.*, No. 19-op-45853; and *City of Ogdensburg v. Purdue Pharma, L.P.*, No. 19-op-45852. The parties seek to compel the third-party deposition of Laura Randa King, a National Sales Account Manager with Purdue Pharma’s Managed Care Division from 1997 through early 2005, who appears on numerous emails and other communications concerning defendants Express Scripts and OptumInsight during that time period.

On April 22, 2026, Plaintiffs issued a Notice of Subpoena advising counsel of record that a subpoena to testify at deposition would be served on Laura Randa King pursuant to Rule 45 of the Federal Rules of Civil Procedure. On April 24, 2026, at the address of 1121 Morningside Pl., Sarasota, FL 34236, Randa was properly served with: (1) a Subpoena to Testify at a Deposition in a Civil Action, (2) the Amended Case Management Order No. 2, and (3) a Notice of Videotaped Deposition of Laura Randa King. Plaintiffs received an Affidavit of Service on May 5, 2026.

On May 22, 2026, counsel for Randa, Mr. Paul Werner, notified the parties that he represented Randa and requested a time to meet and confer regarding the “need and burden of the requested non-party discovery.” Mr. Werner also objected to the deposition on relevance grounds and characterized the deposition as a waste of time and money.

Over the following months, the parties exchanged numerous correspondences and met and conferred in an effort to resolve Mr. Werner's objections to the deposition. On September 8, 2026, Mr. Werner advised that Randa was available to sit for her deposition on October 26th or 27th in Sarasota, Florida. Counsel for Express Scripts promptly advised that either date was agreeable, and on September 16, 2026, Plaintiffs filed and served an updated Notice of Taking Deposition of Laura Randa, noticing her deposition for October 26, 2026. The following day, Express Scripts filed a Cross-Notice of Deposition of Laura Randa.

On September 22, 2026, Express Scripts requested that Mr. Werner accept service of the Cross-Notice on behalf of Randa. Mr. Werner responded he would accept service but would be objecting to the same. Mr. Werner further advised he would not agree to allow the deposition of Randa to last longer than four hours total, even though Mr. Werner had earlier agreed that Plaintiffs, alone, would take no more than four hours.

The parties ultimately reached impasse regarding how long the deposition would last and how the time would be divided. The parties submitted their positions in writing detailing their disputes and negotiations, and the Special Master conducted a telephonic hearing on September 25, 2026. The undersigned considered all these materials and issued an informal ruling via email. Plaintiffs then asked that the Ruling be formalized—apparently for the purpose of ensuring the Ruling is recognized in Florida and not for the purpose of objecting to the MDL Court. This is the formal Ruling.

There has been no enforceable stipulation or agreement between all the parties that the total duration of the deposition will be limited to four hours. As set forth in Fed. R. Civ. P. 30(d)(1), the Federal Rules provide for seven hours, and the deponent is not entitled to unilaterally limit the duration of her deposition to less than the Rules allow. The subpoena of Randa was properly issued

and served in Sarasota, Florida, and the subject matter is clearly relevant to the MDL-2804 proceedings.

Accordingly, the undersigned orders that the total duration of the deposition of Randa is 7.0 hours, and Plaintiffs and the PBM Defendants may each depose Ms. Randa for 3.5 hours; however, each side should not use all their time unless necessary. This deposition shall take place in person, within the jurisdiction of the United States District Court for the Middle District of Florida.

RESPECTFULLY SUBMITTED,

/s/ David R. Cohen

David R. Cohen

Special Master

Dated: October 6, 2026