

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK COUNTY, ss

SUPERIOR COURT DEPARTMENT
No. 1884-cv-01808 (BLS2)

_____)
COMMONWEALTH OF MASSACHUSETTS,)
))
Plaintiff,)
))
v.)
))
PURDUE PHARMA L.P.,)
PURDUE PHARMA INC., RICHARD SACKLER,)
THERESA SACKLER, KATHE SACKLER,)
JONATHAN SACKLER, MORTIMER D.A.)
SACKLER, BEVERLY SACKLER, DAVID)
SACKLER, ILENE SACKLER LEFCOURT,)
PETER BOER, PAULO COSTA, CECIL)
PICKETT, RALPH SNYDERMAN, JUDITH)
LEWENT, CRAIG LANDAU, JOHN STEWART,)
MARK TIMNEY, and RUSSELL J. GASDIA)
Defendants.)
_____)

**LEARN TO COPE, INC.’S JOINDER TO THE MEDIA CONSORTIUM’S
EMERGENCY MOTION TO TERMINATE IMPOUNDMENT OF FIRST AMENDED
COMPLAINT AND ACCOMPANYING EXHIBITS**

Pursuant to Rules 6(a) and 10 of the Uniform Rules of Impoundment Procedure, non-party Learn to Cope, Inc. (“Learn to Cope”), respectfully joins the Emergency Motion to Terminate Impoundment of First Amended Complaint and Accompanying Exhibits (the “Emergency Motion”) filed by non-parties, Dow Jones & Company, Inc., publisher of *The Wall Street Journal*; Boston Globe Media Partners, LLC, publisher of *STAT* and *The Boston Globe*; Reuters News and Media Inc., owner of the Reuters news agency; The New York Times Company, publisher of *The New York Times*; and Trustees of the Boston University, through its radio station, WBUR (collectively, the “Media Consortium”). As stated by the Media Consortium, the Emergency Motion was served on an emergency basis as the Court has scheduled a hearing on the issue of

impoundment for January 25, 2019. For this same reason, Learn to Cope has similarly submitted this joinder on an emergency basis.

Learn to Cope is a non-profit support network founded in 2004 that offers education, resources, and peer support for family members in Massachusetts affected by the opioid crisis. For fifteen years Learn to Cope members have formed a community of support and a welcoming environment to share personal stories of hope, loss, and recovery. Now, over 10,000 members use the resources offered on Learn to Cope's online forum and attend weekly meetings in over twenty-five Massachusetts communities and across a dozen counties. The members are grandparents, parents, siblings, sons, daughters, and friends of those addicted to the products manufactured by the Defendants. The members are following this lawsuit closely and for this reason respectfully request the Court allow the relief requested by the Media Consortium.

As stated in the First Amended Complaint, “[p]rescription medicines, which are supposed to protect our health, are instead ruining people’s lives.” Am. Compl. at 2 (Docket No. 29). “Every community in our Commonwealth suffers from the epidemic of addiction and death.” *Id.* The Learn to Cope members are the individuals behind these allegations. These members have experienced addiction and death, but also the shame and financial precarity that is the result of the products manufactured by the Defendants. Failing to terminate the impoundment will keep factual allegations secret and continue the stigmatization of the family members who live through this crisis by perpetuating the myth that those who become addicted to the Defendants’ products must bear the full blame for their abuse. Learn to Cope and its members deserve all the information available regarding this crisis and the alleged unfair and deceptive acts of the Defendants.

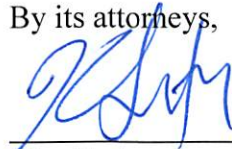
For these reasons, Learn to Cope respectfully joins the Emergency Motion and hereby adopts and incorporates by reference the detailed reasons set forth therein. In addition, Learn to Cope submits an accompanying memorandum with brief additional reasons for the relief

requested, and incorporates by reference the statements made therein.

Respectfully submitted,

LEARN TO COPE, INC.

By its attorneys,



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Dated: January 24, 2019

CERTIFICATE OF SERVICE

I, Kevin Smith, hereby certify that on January 24, 2019, the foregoing document was served pursuant to Uniform Rules of Impoundment 4(a) by Federal Express and e-mail on counsel for all parties, as follows:

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