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January 24, 2019

**BY HAND**

The Honorable Janet L. Sanders  
Suffolk County Superior Court  
Suffolk County Courthouse, 10th Floor  
3 Pemberton Square  
Boston, MA 02108

**Re: Commonwealth v. Purdue Pharma L.P., et al. (Civ. No. 1884-01808-BLS2)**

Dear Judge Sanders:

Purdue writes to request an adjournment of the hearing scheduled for January 25. As discussed at the December 21, 2018 hearing, the parties are bound by an MDL Court procedure to evaluate disputes pertaining to the confidentiality designations of documents produced pursuant to the MDL. While Purdue has already voluntarily agreed to remove redactions from over 500 paragraphs of the Amended Complaint, the Commonwealth has objected to all of remaining redactions. On January 14, the Commonwealth submitted its challenge to MDL Special Master Yanni, and Purdue provided its responsive letter brief to the Special Master on January 22. The Commonwealth subsequently requested, and was granted, leave to reply to Purdue's letter brief by January 29. Accordingly, the MDL process for evaluating the confidentiality of the remaining redactions remains pending, and the Special Master will likely convene a hearing and issue a recommendation in the near future resolving the confidentiality status of these allegations.

As this Court noted during the December 21, 2018 hearing, it is possible that the Special Master's determinations could entirely resolve or significantly narrow the present dispute. At the time the Court set the date for tomorrow's hearing, all parties and the Court were anticipating that the MDL process would be completed by January 25. However, while the MDL process is far along, it has now become clear that it will not be concluded prior to this Court's scheduled hearing. Accordingly, Purdue requests an adjournment of the January 25 hearing until the Special Master (or, if necessary, the judge presiding over the MDL) has issued a ruling as to the confidentiality challenges. Should the Court grant this adjournment, the parties will plan to file a joint status report with the Court on Friday, February 1 to report on the MDL process.

Respectfully,



Timothy C. Blank

**CC (By Email, With Enclosures):**

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