

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT
CIVIL ACTION 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.

AFFIDAVIT OF ROBERT J. CORDY

I, Robert J. Cordy, am a partner at McDermott Will & Emery LLP, located at 28 State Street, Boston, Massachusetts 02109, counsel for Peter Boer, Paulo Costa, Ilene Sackler Lefcourt, Judy Lewent, Cecil Pickett, Beverly Sackler, David Sackler, Jonathan Sackler, Kathe Sackler, Mortimer D.A. Sackler, Richard Sackler, Theresa Sackler, and Ralph Snyderman (collectively, the “**Individual Directors**”) in the above-captioned action. I make this affidavit under pains and penalty of perjury in support of the Individual Directors’ Motions to Dismiss the

First Amended Complaint (“**FAC**”) filed by the Commonwealth of Massachusetts, and state that true and correct copies or excerpts of the following documents are attached as exhibits hereto:¹

1. Exhibit 1 is a memorandum from Jonathan Sackler to Distribution re: Quarterly Report dated April 26, 1994, bearing Bates number PDD1701827936, and is referenced in the FAC at ¶ 173 n.58.

2. Exhibit 2 is the 1995 FDA-approved package insert for OxyContin and is a publicly available document.

3. Exhibit 3 is a Purdue Newsletter titled "OxyContin: The Most Significant Launch in Purdue History" (Volume 11, Number 1, Winter 1996), bearing Bates numbers PKY180280951 - PKY180280962, and is referenced in the FAC at ¶ 175 n.64.

4. Exhibit 4 is an email from Richard Sackler dated February 3, 1997, bearing Bates numbers PDD1701345999 - PDD1701346000, and is referenced in the FAC at ¶ 174 n.63.

5. Exhibit 5 is an email from Richard Sackler to Michael Friedman dated April 23, 1997, bearing Bates numbers PDD1701801141 - PDD1701801145, and is referenced in the FAC at ¶ 176 n.65.

6. Exhibit 6 is an email from Richard Sackler to Michael Friedman dated May 28, 1997, bearing Bates numbers PDD1508224773 - PDD1508224774, and is referenced in the FAC at ¶ 176 n.65.

7. Exhibit 7 is an email from Richard Sackler to Michael Friedman dated June 12, 1997, bearing Bates numbers PDD8801141848 - PDD8801141849, and is referenced in the FAC at ¶ 176 n.65.

¹ Counsel for the Individual Directors will provide full copies of all excerpted documents at the request of the Court for in camera inspection.

8. Exhibit 8 is an email from Richard Sackler to Mark Alfonso *et al.* dated September 28, 1998, bearing Bates numbers PDD1701546497 - PDD1701546498, and is referenced in the FAC at ¶ 177 n.67.

9. Exhibit 9 is an email from Richard Sackler dated October 13, 1999, bearing Bates number #436363.1, and is referenced in the FAC at ¶ 279 n.232.

10. Exhibit 10 is a letter from Richard Sackler, bearing Bates number PDD1501720041, and is referenced in the FAC at ¶ 185 n.84.

11. Exhibit 11 is an email from Richard Sackler to Tom Gruber dated February 1, 2001, bearing Bates numbers PDD8801133516 - PDD8801133517, and is referenced in the FAC at ¶ 183 n.82.

12. Exhibit 12 is an email from Richard Sackler to Robin Hogen, *et al.* dated February 8, 2001, bearing Bates numbers PDD8801151727 - PDD8801151729, and is referenced in the FAC at ¶ 182 n.79.

13. Exhibit 13 is a New York Times article, titled "Sales of Painkiller Grew Rapidly, But Success Brought a High Cost- By Barry Meier and Melody Petersen (March 5, 2001)," bearing Bates numbers PDD9316101737 - PDD9316101742, and is referenced in the FAC at ¶ 184 n.83.

14. Exhibit 14 is intentionally omitted.

15. Exhibit 15 is Minutes of a Meeting of the Board of Directors dated April 26, 2007, bearing Bates number PPLP004415274, and is referenced in the FAC at ¶ 222 n.125.

16. Exhibit 16 is the Consent Judgment between the Commonwealth of Massachusetts and Purdue entered on May 15, 2007, and is a publicly available document.

17. Exhibit 17 is the Purdue Quarterly Report to the Board dated July, 15 2007, bearing Bates number PWG000300830, and is referenced in the FAC at ¶ 206 n.106.

18. Exhibit 18 is the Purdue Quarterly Report to the Board dated October 15, 2007, bearing Bates numbers PPLPC012000157402 – PPLPC012000157461, and is referenced in the FAC at ¶ 211 n.113.

19. Exhibit 19 is a Sales and Marketing presentation dated October 26, 2007, bearing Bates number PPLPC012000159022, and is referenced in the FAC at ¶ 223 n.126.

20. Exhibit 20 is the Purdue Quarterly Report to the Board dated January 15, 2008, bearing Bates numbers PDD8901733974 – PDD8901734003, and is referenced in the FAC at ¶ 217 n.120.

21. Exhibit 21 is an email from Richard Sackler to Gasdia Russell dated January 30, 2008, bearing Bates numbers PPLPC012000168321 - PPLPC012000168326, and is referenced in the FAC at ¶ 219 n.122.

22. Exhibit 22 is an email from Richard Sackler to John Stewart *et al.* dated February 13, 2008, bearing Bates numbers PPLPC012000170948 - PPLPC012000170949, and is referenced in the FAC at ¶ 226 n.128.

23. Exhibit 23 is an email from Richard Sackler to Edward Mahony *et al.* dated February 19, 2008, bearing Bates numbers PPLPC004000150465 - PPLPC004000150467, and is referenced in the FAC at ¶ 220 n.124.

24. Exhibit 24 is an email from Mortimer Sackler to Edward Mahony *et al.* dated February 26, 2008, bearing Bates numbers PPLPC012000172673 - PPLPC012000172676, and is referenced in the FAC at ¶ 229 n.137.

25. Exhibit 25 is an email from Russell Gasdia to John Stewart *et al.* dated March 9, 2008, bearing Bates numbers PPLPC012000174202 – PPLPC012000174206, and is referenced in the FAC at ¶ 230 n.143.

26. Exhibit 26 is an email from Edward Mahony to Richard Sackler *et al.* dated March 9, 2008, bearing Bates numbers PPLPC012000175155 - PPLPC012000175157, and is referenced in the FAC at ¶ 234 n.149.

27. Exhibit 27 is a memorandum from Peter Boer to Richard Sackler re: CEO Considerations dated April 12, 2008, bearing Bates numbers PDD9316314309 - PDD9316314313, and is referenced in the FAC at ¶ 498 n.610.

28. Exhibit 28 is the Purdue Quarterly Report to the Board dated April 15, 2008, bearing Bates number PDD8901724434, and is referenced in the FAC at ¶ 792 n.947.

29. Exhibit 29 is Minutes of a Meeting of the Board of Directors dated April 18, 2008, bearing Bates numbers PKY183212634-37, and is referenced in the FAC at ¶ 240 n.158.

30. Exhibit 30 is an email from Richard Sackler to Russell Gasdia and Mike Innaurato dated April 22, 2008, bearing Bates number PPLPC012000179497, and is referenced in the FAC at ¶ 240 n.159.

31. Exhibit 31 is the Purdue Quarterly Report to the Board dated July 15, 2008, bearing Bates numbers PPLP004367297 – PPLP004367329, and is referenced in the FAC at ¶ 246 n.167.

32. Exhibit 32 is the Purdue Quarterly Report to the Board dated October 15, 2008, bearing Bates number PDD9316101002, and is referenced in the FAC at ¶ 248 n.169.

33. Exhibit 33 is an email from Brad Griffin to Lisa Miller *et al.* dated February 17, 2009 bearing bates numbers PPLPC012000213086 – PPLPC012000213087, and is referenced in the FAC at ¶ 252 n.177.

34. Exhibit 34 is a spreadsheet attached to an email from Brad Griffin to Lisa Miller *et al.* dated February 17, 2009, bearing Bates number PPLPC012000213088, and is referenced in the FAC at ¶ 252 n.177.

35. Exhibit 35 is Minutes of a Meeting of the Board of Directors dated March 5, 2009, bearing Bates numbers PKY183212703-04, and is referenced in the FAC at ¶ 253 n.178.

36. Exhibit 36 is Minutes of a Meeting of the Purdue Pharma Inc. Board of Directors dated March 5, 2009, bearing Bates numbers PKY183213137 – PKY183213138, and is referenced in the FAC at ¶ 502 n.611.

37. Exhibit 37 is the Purdue Quarterly Report to the Board dated April 16, 2009, bearing Bates number PDD9316304313, and is referenced in the FAC at ¶ 254 n.179.

38. Exhibit 38 is an email from Russell Gasdia to James Dolan *et al.* dated April 21, 2009, bearing Bates numbers PPLPC012000220948 - PPLPC012000220949, and is referenced in the FAC at ¶ 254 n.180.

39. Exhibit 39 is an email from Russell Gasdia to Larry Pickett *et al.* dated April 30, 2009, bearing Bates numbers PPLPC012000221936 - PPLPC012000221939, and is referenced in the FAC at ¶ 254 n.181.

40. Exhibit 40 is the Corporate Compliance Quarterly Report to the Board (1Q2009) dated May 8, 2009, bearing Bates number PPLPC029000274906, and is referenced in the FAC at ¶ 256 n.183.

41. Exhibit 41 is an email from Richard Sackler to John Stewart *et al.* dated July 20, 2009, bearing Bates numbers PPLPC012000232015 - PPLPC012000232017, and is referenced in the FAC at ¶ 260 n.193.

42. Exhibit 42 is the Purdue Quarterly Report to the Board dated July 30, 2009, bearing Bates number PPLPC012000233246, and is referenced in the FAC at ¶ 260 n.192.

43. Exhibit 43 is an email from Mortimer Sackler to Edward Mahony *et al.* dated September 28, 2009, bearing Bates numbers PPLPC012000240032 - PPLPC012000240037, and is referenced in the FAC at ¶ 265 n.202.

44. Exhibit 44 is an email from John Stewart to Richard Sackler *et al.* dated October 19, 2009, bearing Bates numbers PPLPC032000114702 – PPLPC032000114706, and is referenced in the FAC at ¶ 267 n.208.

45. Exhibit 45 is a Purdue Budget presentation dated November 2, 2009, bearing Bates numbers PPLPC012000249328 - PPLPC012000249337, and is referenced in the FAC at ¶ 269 n.211.

46. Exhibit 46 is Minutes of a Meeting of the Board of Directors dated November 3, 2009, bearing Bates numbers PKY183212802-04, and is referenced in the FAC at ¶ 268 n.209.

47. Exhibit 47 is the Purdue 2010 Budget Submission (November 2009), bearing Bates number PDD9273201222, and is referenced in the FAC at ¶ 268 n.209.

48. Exhibit 48 is an email from Richard Sackler to David Rosen dated January 16, 2010, bearing Bates numbers PPLPC023000260292 - PPLPC023000260293, and is referenced in the FAC at ¶ 288 n.255.

49. Exhibit 49 is the Purdue Quarterly Report to the Board dated February 1, 2010, bearing Bates number PPLPC012000252797, and is referenced in the FAC at ¶ 289 n.256.

50. Exhibit 50 is the Purdue Quarterly Report to the Board dated April 21, 2010, bearing Bates numbers PWG000423139 – PWG000423159, and is referenced in the FAC at ¶ 302 n.270.

51. Exhibit 51 is an email from Richard Sackler to JHS (US) dated July 1, 2010, bearing Bates number PPLPC012000277480 - PPLPC012000277481, and is referenced in the FAC at ¶ 304 n.272.

52. Exhibit 52 is Minutes of a Meeting of the Board of Directors dated July 22, 2010, bearing Bates numbers PKY183212838-89, and is referenced in the FAC at ¶ 505 n.614.

53. Exhibit 53 is Purdue Shareholders & Board Meeting - "Questions Arising During Presentations," dated July 22, 2010, bearing Bates number PPLPC012000283167, and is referenced in the FAC at ¶ 308 n.280.

54. Exhibit 54 is the Purdue Quarterly Report to the Board dated July 27, 2010, bearing Bates numbers PWG000422476 – PWG000422503, and is referenced in the FAC at ¶ 208 n.109.

55. Exhibit 55 is a spreadsheet showing Region Zero prescriber information, bearing Bates number PPLPC012000283175, and is referenced in the FAC at ¶ 310 n.283.

56. Exhibit 56 is a Paul Coplan presentation "Epidemiology and lifecycle Plans for OxyContin" dated August 19, 2010, bearing Bates number PPLPC012000283469, and is referenced in the FAC at ¶ 319 n.295.

57. Exhibit 57 is a document showing "Medical Education Materials for HCPs – By Title and Medium (Jan 2009 thru Aug 2010)," bearing bates numbers PWG000247083 – PWG000247089, and is referenced in the FAC at ¶ 205 n.105.

58. Exhibit 58 is a document showing Purdue Pharma Grants and Giving between January 1, 2009, and December 31, 2009, bearing Bates numbers PPLPC012000292674 - PPLPC012000292755, and is referenced in the FAC at ¶ 323 n.303.

59. Exhibit 59 is a document showing Purdue Pharma Grants and Giving between January 1, 2010, and September 30, 2010, bearing Bates numbers PPLPC012000292756 - PPLPC012000292826, and is referenced in the FAC at ¶ 323 n.303.

60. Exhibit 60 is an email from Paul Coplan to Alan Must dated December 3, 2010, bearing Bates numbers PPLPC017000258652 - PPLPC017000258654, and is referenced in the FAC at ¶ 278 n.228.

61. Exhibit 61 is the Purdue Quarterly Report to the Board dated January 24, 2011, bearing Bates numbers PWG000421547 – PWG000421582, and is referenced in the FAC at ¶ 335 n.328.

62. Exhibit 62 is an email from Richard Sackler to Russell Gasdia dated January 30, 2011, bearing Bates numbers PPLPC012000308371 - PPLPC012000308372, and is referenced in the FAC at ¶ 330 n.313.

63. Exhibit 63 is Purdue FDA Post-Marketing Requirements for Reformulated OxyContin presentation slides bearing Bates numbers PDD8901468097 – PDD8901468109, and is referenced in the FAC at ¶ 510 n.618.

64. Exhibit 64 is the Purdue Quarterly Report to the Board dated May 2, 2011, bearing Bates numbers PPLPC012000322426 – PPLPC012000322461, and is referenced in the FAC at ¶ 208 n.109.

65. Exhibit 65 is Corporate Compliance Quarterly Report to the Board (1Q2011) dated May 20, 2011, bearing Bates numbers PPLP004406032 - PPLP004406051, and is referenced in the FAC at ¶ 346 n.347.

66. Exhibit 66 is an email from Jonathan Sackler to John Stewart dated May 25, 2011, bearing Bates numbers PPLPC012000326194 - PPLPC012000326206, and is referenced in the FAC at ¶ 344 n.342.

67. Exhibit 67 is an email from Richard Sackler to Russell Gasdia dated June 16, 2011, bearing Bates numbers PPLPC012000329706 - PPLPC012000329709, and is referenced in the FAC at ¶ 353 n.360.

68. Exhibit 68 is an attachment to Edward Mahony email dated June 28, 2011, bearing Bates numbers PPLPC012000331345 - PPLPC012000331348, and is referenced in the FAC at ¶ 358 n.367.

69. Exhibit 69 is intentionally omitted.

70. Exhibit 70 is the Purdue Quarterly Report to the Board dated August 3, 2011, bearing Bates numbers PWG000420318 - PWG000420354, and is referenced in the FAC at ¶ 361 n.370.

71. Exhibit 71 is an email from Jonathan Sackler to Russell Gasdia dated January 9, 2012, bearing Bates number PPLPC012000358983, and is referenced in the FAC at ¶ 366 n.379.

72. Exhibit 72 is an email from Windell Fisher to Russell Gasdia dated February 12, 2012, bearing Bates numbers PPLPC012000364017 – PPLPC012000364023, and is referenced in the FAC at ¶ 371 n.395.

73. Exhibit 73 is an email from Russell Gasdia to Mortimer Sackler dated February 8, 2012, Bearing bates numbers PPLPC026000095655 - PPLPC026000095662, and is referenced in the FAC at ¶ 368 n.386.

74. Exhibit 74 is an email from David Rosen to Richard Sackler dated April 20, 2012, bearing Bates number PPLPC012000374532, and is referenced in the FAC at ¶ 378 n.411.

75. Exhibit 75 is the Purdue Quarterly Report to the Board dated April 30, 2012, bearing Bates numbers PPLPC012000374791 – PPLPC012000374827, and is referenced in the FAC at ¶ 208 n.109.

76. Exhibit 76 is an email from Don Kyle to Gary Styles dated May 21, 2012, bearing Bates numbers PPLPC028000418291 - PPLPC028000418292, and is referenced in the FAC at ¶ 285 n.249.

77. Exhibit 77 is an email from Paulo Costa to Russell Gasdia dated June 4, 2012, bearing Bates numbers PPLPC012000378550 - PPLPC012000378551, and is referenced in the FAC at ¶ 551 n.660.

78. Exhibit 78 is an email from Mike Innaurato to Paulo Costa dated June 11, 2012, bearing Bates number PPLPC012000382120, and is referenced in the FAC at ¶ 551 n.661.

79. Exhibit 79 is the Purdue Quarterly Report to the Board dated July 23, 2012, bearing Bates numbers PPLPC012000387069 – PPLPC012000387121, and is referenced in the FAC at ¶ 208 n.109.

80. Exhibit 80 is Minutes of a Meeting of the Board of Directors dated August 16, 2012, bearing Bates numbers PKY183212960-61, and is referenced in the FAC at ¶ 554 n.665.

81. Exhibit 81 is the Purdue Quarterly Report to the Board dated November 1, 2012, bearing Bates numbers PPLPC012000396634 - PPLPC012000396673, and is referenced in the FAC at ¶ 556 n.667.

82. Exhibit 82 is a letter to FDA Commissioner Hamburg from National Association of Attorneys General dated December 16, 2013, and is a publicly available document.

83. Exhibit 83 is a list of Government Affairs TRF letters to FDA attached to Burt Rosen email dated January 15, 2013, bearing Bates numbers PPLPC032000255064 - PPLPC032000255067, and is referenced in the FAC at ¶ 557 n. 668.

84. Exhibit 84 is Minutes of a Meeting of the Purdue Pharma Inc. Board of Directors dated January 15, 2013, bearing Bates numbers PKY183213441 – PKY183213442, and is referenced in the FAC at ¶ 503 n.612.

85. Exhibit 85 is the Purdue Quarterly Report to the Board dated January 28, 2013, bearing Bates numbers PPLPC012000407127 - PPLPC012000407184, and is referenced in the FAC at ¶ 558 n.669.

86. Exhibit 86 is Minutes of a Meeting of the Purdue Pharma Inc. Board of Directors dated February 13, 2013, bearing Bates number PKY183213449, and is referenced in the FAC at ¶ 503 n.612.

87. Exhibit 87 is the Purdue Quarterly Report to the Board dated May 13, 2013, bearing Bates numbers PPLP004367540 – PPLP004367603, and is referenced in the FAC at ¶ 208 n.109.

88. Exhibit 88 is Paulo Costa meeting notes dated June 25, 2013, bearing Bates numbers PPLPC0021000577371 - PPLPC0021000577372, and is referenced in the FAC at ¶ 566 n.677.

89. Exhibit 89 is an email from Mortimer Sackler to Edward Mahony dated July 6, 2013, bearing Bates numbers PPLPC012000431309 - PPLPC012000431314, and is referenced in the FAC at ¶ 404 n.457.

90. Exhibit 90 is an email from Tim Richards to Edward Mahony *et al.* dated July 11, 2013, bearing Bates numbers PPLPC012000431842 - PPLPC012000431843, and is referenced in the FAC at ¶ 566 n.678.

91. Exhibit 91 is an email from Tim Richards to Todd Killian *et al.* dated July 15, 2013, bearing Bates number PPLPC012000432169, and is referenced in the FAC at ¶ 566 n.678.

92. Exhibit 92 is the Purdue Quarterly Report to the Board dated July 23, 2013, bearing Bates numbers PPLPC012000433388 – PPLPC012000433447, and is referenced in the FAC at ¶ 217 n.120.

93. Exhibit 93 is an email from Edward Mahony to Jon Lowne *et al.* dated September 19, 2013, bearing Bates number PPLPC012000441854, and is referenced in the FAC at ¶ 571 n.685.

94. Exhibit 94 is an email from Edward Mahony to John Stewart *et al.* dated September 19, 2013, bearing Bates number PPLPC012000441858, and is referenced in the FAC at ¶ 571 n.685.

95. Exhibit 95 is an email from Mortimer Sackler to Edward Mahony *et al.* dated October 28, 2013, bearing Bates numbers PPLPC012000448835 - PPLPC012000448843, and is referenced in the FAC at ¶ 414 n.472.

96. Exhibit 96 is Purdue Analgesic Market Update presentation slides bearing Bates numbers PPLP004410000 – PPLP004410018, and is referenced in the FAC at ¶ 415 n.477.

97. Exhibit 97 is the Purdue Quarterly Report to the Board dated November 1, 2013, bearing Bates numbers PPLPC002000186911 – PPLPC002000186966, and is referenced in the FAC at ¶ 423 n.491.

98. Exhibit 98 is an email from Alan Must to Raul Damas dated November 11, 2013, bearing Bates numbers PPLPC020000733992 – PPLPC020000733993, and is referenced in the FAC at ¶ 417 n.483.

99. Exhibit 99 is an email from Burt Rosen to Jonathan Sackler dated January 3, 2014, bearing Bates numbers PPLPC020000748356 - PPLPC020000748357, and is referenced in the FAC at ¶ 429 n.500.

100. Exhibit 100 is the Purdue Quarterly Report to the Board dated February 4, 2014, bearing Bates numbers PPLPC002000181035 – PPLPC002000181082, and is referenced in the FAC at ¶ 208 n.109.

101. Exhibit 101 is a memorandum from Burt Rosen to Raymond Sackler dated May 4, 2014, bearing Bates numbers PWG000412143 - PWG000412145, and is referenced in the FAC at ¶ 440 n.522.

102. Exhibit 102 is an email from Raymond Sackler to Burt Rosen *et al.* dated May 5, 2014, bearing Bates numbers PWG000412141 - PWG000412142, and is referenced in the FAC at ¶ 440 n.522.

103. Exhibit 103 is an email from Richard Sackler to Mark Timney *et al.* dated May 14, 2014, bearing Bates numbers PPLPC019000926225 – PPLPC019000926226, and is referenced in the FAC at ¶ 439 n.520.

104. Exhibit 104 is an email from Brian Meltzer to Kathe Sackler dated September 10, 2014, bearing Bates number PPLPC017000564600, and is referenced in the FAC at ¶ 445 n.534.

105. Exhibit 105 is Project Tango presentation slides, dated September 10, 2014, bearing Bates number PPLPC017000564601, and is referenced in the FAC at ¶ 446 n.535.

106. Exhibit 106 is Project Tango presentation slides dated September 12, 2014, bearing Bates number PPLPC016000255303, and is referenced in the FAC at ¶ 445 n.534.

107. Exhibit 107 is an email from Kathe Sackler to Mark Timney dated September 16, 2014, bearing Bates number PPLPC020000834184 - PPLPC020000834187, and is referenced in the FAC at ¶ 448 n.537.

108. Exhibit 108 is Project Tango presentation slides submitted February 24, 2015, bearing Bates number PPLPC002000208957, and is referenced in the FAC at ¶ 450 n.540.

109. Exhibit 109 is Executive Committee presentation slides dated December 10, 2015, bearing Bates number PPLPC011000073230, and is referenced in the FAC at ¶ 468 n.567.

110. Exhibit 110 is Purdue Board Meeting Commercial Update presentation slides dated April 13, 2016, bearing Bates number PPLPC016000286167, and is referenced in the FAC at ¶ 76 n.19.

111. Exhibit 111 is Purdue Board of Directors Business Development Strategy presentation slides dated May 27, 2016, bearing Bates numbers PPLPC011000099235 – PPLPC011000099348, and is referenced in the FAC at ¶ 473 n.572.

112. Exhibit 112 is Purdue Mid-Year Update presentation slides dated June 8, 2016, bearing Bates number PPLPC011000099783, and is referenced in the FAC at ¶ 479 n.581.

113. Exhibit 113 is Braeburn Pharmaceuticals - Structuring Analysis presentation slides, bearing Bates numbers PPLPC022000980231 - PPLPC022000980246, and is referenced in the FAC at ¶ 482 n.588

114. Exhibit 114 is an email from Elliott Ruiz to Mortimer Sackler *et al.* dated December 22, 2016, bearing Bates number PPLPC022000980230, and is referenced in the FAC at ¶ 482 n.587.

115. Exhibit 115 is an email from Theresa Sackler to Gail Cawkwell dated May 6, 2017, bearing Bates numbers PPLPC011000147096 - PPLPC011000147098, and is referenced in the FAC at ¶ 484 n.591.

116. Exhibit 116 is Board of Directors Mid Year Pre-Read presentation slides dated June 2017, bearing Bates numbers PPLPC011000151189 - PPLPC011000151357, and is referenced in the FAC at ¶ 486 n.593.

117. Exhibit 117 is a spreadsheet showing Butrans Total Prescriptions by HCP, Product and Strength, dated August 2017, bearing Bates number PWG003984518, and is referenced in the FAC at ¶ 239 n.156.

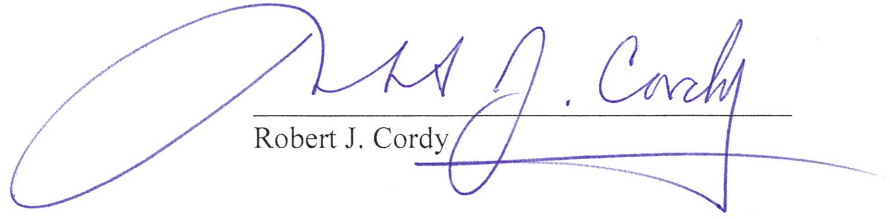
118. Exhibit 118 is Purdue draft Commercial Budget Meeting presentation slides dated 2017, bearing Bates number PPLPC016000323215, and is referenced in the FAC at ¶ 492 n.604.

119. Exhibit 119 is an email from Craig Landau dated November 21, 2017, bearing Bates numbers PPLPC016000321333 - PPLPC016000321335, and is referenced in the FAC at ¶ 492 n.603.

120. Exhibit 120 is a list of FDA-approved drugs, retrieved March 29, 2019, and is a publicly available document.

121. Exhibit 121 is an email from Burt Rosen to Dr. Cornelia Hentzsch dated January 15, 2013, bearing Bates number PPLPC032000255061, and is referenced in the FAC at ¶ 557 n.668.

Signed under the pains and penalties of perjury this 1st day of April 2019.



Robert J. Cordy

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