

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT  
CIVIL ACTION NO.  
1884-cv-01808(B)

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.

**DECLARATION OF RICHARD SACKLER**

I, Richard Sackler, declare as follows:

1. I am a defendant in the action *Commonwealth of Massachusetts v. Purdue Pharma L.P. et al.*, No. 1884-cv-01808(B) (Mass. Sup. Ct. Suffolk Cnty.), which asserts claims (the “**Claims**”) based on events allegedly occurring after May 15, 2007 (the “**Period**”). I submit this declaration in support of my motion to dismiss the First Amended Complaint filed in that action.

2. At the start of the Period, my primary residence was in Connecticut. I maintained my primary residence in Connecticut until 2013, when I moved to Texas. In 2018, I moved from Texas to Florida, which is now my primary residence. During the Period, I have not resided in

Massachusetts, owned or rented property in Massachusetts, or maintained an office in Massachusetts.

3. I served as a director of the Board of Directors of Purdue Pharma Inc. (“**PPI**”) throughout the Period until July 24, 2018. During the Period, I have not served as a director of Purdue Pharma L.P. (“**PPLP**,” and together with PPI, the “**Purdue Defendants**”), which has no directors. I have not served as an employee or officer of either company during the Period.

4. During my tenure as a director of PPI in the Period, to the best of my recollection, knowledge, and belief:

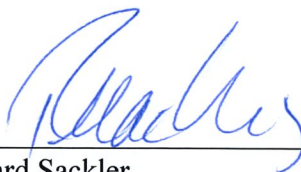
- a. No meetings of the Board of Directors of PPI took place in Massachusetts.
- b. I did not conduct business on behalf of either Purdue Defendant in Massachusetts except in connection with an investment by PPLP in Infinity Pharmaceuticals, Inc. (“**Infinity**”), which ended in approximately 2013, and a securities purchase agreement with Novelos Therapeutics, Inc. (“**Novelos**”), which PPLP entered into in 2009. My understanding is that Infinity was a company specializing in cancer treatments, Novelos was a company that developed treatments for cancer and hepatitis, and neither Infinity nor Novelos was involved with the manufacture, sale or marketing of opioids. I traveled to Massachusetts on approximately 6 occasions between 2008 and 2011 in connection with the Infinity investment and on approximately 2 occasions in 2009 in connection with Novelos.
- c. I did not direct the management of either Purdue Defendant, or any sales representative employed by either Purdue Defendant, to visit doctors in

Massachusetts, send emails for savings cards to Massachusetts practitioners, or violate the 2007 Settlement Agreement and Consent Judgment with Massachusetts. Nor did I otherwise direct any marketing, sales or promotional activities by PPI, PPLP or any of their subsidiaries or affiliates, in Massachusetts.

- d. Except as set forth in ¶4(b), above, I did not travel to Massachusetts on behalf of either Purdue Defendant; my travel to Massachusetts was for philanthropic, scientific or personal purposes, including in connection with my service on the advisory boards of educational and research institutions in Massachusetts.
- e. I did not take any action related to the Claims in Massachusetts.
- f. I never went into the field with sales representatives to promote opioids to doctors on behalf of either Purdue Defendant in Massachusetts.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed at

Greenwich Ct, this 27 day of March, 2019.



Richard Sackler

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT  
CIVIL ACTION NO.  
1884-cv-01808(B)

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, JUDY LEWENT, CRAIG LANDAU,  
JOHN STEWART, MARK TIMNEY, and RUSSELL J.  
GASDIA,

Defendants.

**DECLARATION OF THERESA E. SACKLER**

I, Theresa E. Sackler, declare as follows:

1. I am a defendant in the action *Commonwealth of Massachusetts v. Purdue Pharma L.P. et al.*, No. 1884-cv-01808(B) (Mass. Sup. Ct. Suffolk Cnty.), which asserts claims (the “**Claims**”) based on events allegedly occurring after May 15, 2007 (the “**Period**”). I submit this declaration in support of my motion to dismiss the First Amended Complaint based on lack of personal jurisdiction filed in that action.

2. I currently reside in the United Kingdom. During the Period, I have not resided in Massachusetts, owned or rented property in Massachusetts, or maintained an office in Massachusetts.



3. I served on the Board of Directors of Purdue Pharma, Inc. ("PPI") throughout the Period until September 7, 2018. During the Period, I have not served as a director of Purdue Pharma L.P. ("PPLP" and, together with PPI, the "Purdue Defendants"), which has no directors. I have not served as an employee or officer of either Purdue Defendant during the Period.

4. During the Period, to the best of my recollection, knowledge, and belief:
- a. No meetings of the Board of Directors of PPI took place in Massachusetts.
  - b. I have not conducted any business on behalf of either Purdue Defendant in Massachusetts.
  - c. I did not direct the management of any Purdue Defendant or any sales representative employed by any Purdue Defendant to visit doctors in Massachusetts, send emails for savings cards to Massachusetts practitioners, or violate the 2007 Settlement Agreement or Consent Judgment with Massachusetts. Nor did I otherwise direct any marketing, sales, or promotional activities by PPI, PPLP, or any of their subsidiaries or affiliates in Massachusetts.
  - d. I did not travel to Massachusetts on behalf of either Purdue Defendant.
  - e. I did not take any action related to the Claims in Massachusetts.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at London this 27<sup>th</sup> day of March, 2019.

  
Theresa E. Sackler



COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT  
CIVIL ACTION NO.  
1884-cv-01808(B)

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, JUDY LEWENT, CRAIG LANDAU,  
JOHN STEWART, MARK TIMNEY, and RUSSELL J.  
GASDIA,

Defendants.

**DECLARATION OF KATHE SACKLER**

I, Kathe Sackler, declare as follows:

1. I am a defendant in the action *Commonwealth of Massachusetts v. Purdue Pharma L.P. et al.*, No. 1884-cv-01808(B) (Mass. Sup. Ct. Suffolk Cnty.), which asserts claims (the “**Claims**”) based on events allegedly occurring after May 15, 2007 (the “**Period**”). I submit this declaration in support of my motion to dismiss the First Amended Complaint based on lack of personal jurisdiction filed in that action.

2. I currently reside in Connecticut. During the Period, I have not resided in Massachusetts, owned or rented property in Massachusetts, or maintained an office in Massachusetts.

3. I served on the Board of Directors of Purdue Pharma, Inc. (“PPI”) throughout the Period until September 27, 2018. During the Period, I have not served as a director of Purdue Pharma L.P. (“PPLP” and, together with PPI, the “Purdue Defendants”), which has no directors. Other than serving as a Senior Vice President of PPI and PPLP until May 31, 2007, I have not served as an employee or officer of either Purdue Defendant during the Period.

4. During the Period, to the best of my recollection, knowledge, and belief:
- a. No meetings of the Board of Directors of PPI took place in Massachusetts.
  - b. I have not conducted any business on behalf of either Purdue Defendant in Massachusetts.
  - c. I did not direct the management of any Purdue Defendant or any sales representative employed by any Purdue Defendant to visit doctors in Massachusetts, send emails for savings cards to Massachusetts practitioners, or violate the 2007 Settlement Agreement or Consent Judgment with Massachusetts. Nor did I otherwise direct any marketing, sales, or promotional activities by PPI, PPLP, or any of their subsidiaries or affiliates in Massachusetts.
  - d. I did not travel to Massachusetts on behalf of either Purdue Defendant.
  - e. I did not take any action related to the Claims in Massachusetts.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at New York, N.Y. this 29 day of March, 2019.

  
Kathe Sackler



COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT  
CIVIL ACTION NO.  
1884-cv-01808(B)

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 GASDIA

Defendants.

**DECLARATION OF JONATHAN SACKLER**

I, Jonathan Sackler, declare as follows:

1. I am a defendant in the action *Commonwealth of Massachusetts v. Purdue Pharma L.P. et al.*, No. 1884-cv-01808(B) (Mass. Sup. Ct. Suffolk Cnty.), which asserts claims (the “**Claims**”) based on events allegedly occurring after May 15, 2007 (the “**Period**”). I submit this declaration in support of my motion to dismiss the First Amended Complaint filed in that action.
2. I reside in Connecticut, where I have maintained my primary residence throughout the Period. During the Period, I have not resided in Massachusetts, owned or rented property in Massachusetts, or maintained an office in Massachusetts.

3. I served as a director on the Board of Directors of Purdue Pharma Inc. (“**PPI**”) throughout the Period until December 8, 2018. During the Period, I have not served as a director of Purdue Pharma L.P. (“**PPLP**,” and together with PPI, the “**Purdue Defendants**”), which has no directors. Other than serving as a Senior Vice President of PPI and PPLP until May 31, 2007, I have not served as an employee or officer of either company during the Period.

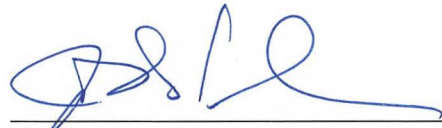
4. During the Period, to the best of my recollection, knowledge, and belief:

- a. No meetings of the Board of Directors of PPI took place in Massachusetts.
- b. I did not conduct any business on behalf either Purdue Defendant in Massachusetts except in connection with an investment by PPLP in Infinity Pharmaceuticals, Inc. (“**Infinity**”), which ended in approximately 2013. My understanding is that Infinity was a company specializing in cancer treatments and was not involved in the manufacture, sale or marketing of opioids. I traveled to Massachusetts on approximately 4 occasions between 2009 and 2011 in connection with the Infinity investment.
- c. I did not direct the management of either Purdue Defendant, or any sales representatives employed by either Purdue Defendant, to visit doctors in Massachusetts, send emails for savings cards to Massachusetts practitioners, or violate the 2007 Settlement Agreement and Consent Judgment with Massachusetts. Nor did I otherwise direct any marketing, sales or promotional activities by PPI, PPLP or any of their subsidiaries or affiliates, in Massachusetts.

- d. Except as set forth in ¶4(b), above, I did not travel to Massachusetts on behalf of either Purdue Defendant; my travel to Massachusetts was for philanthropic, scientific or personal purposes.
- e. I did not take any action related to the Claims in Massachusetts.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed at

Stamford, CT, this 26<sup>th</sup> day of March, 2019.



\_\_\_\_\_  
Jonathan Sackler

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT  
CIVIL ACTION NO.  
1884- cv-01808(B)

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, JUDY LEWENT, CRAIG LANDAU,  
JOHN STEWART, MARK TIMNEY, and RUSSELL J.  
GASDIA,

Defendants.

**DECLARATION OF MORTIMER D.A. SACKLER**

I, Mortimer D.A. Sackler, declare as follows:

I. I am a defendant in the action *Commonwealth of Massachusetts v. Purdue Pharma L.P. et al*, No. 1884-cv-01808(B) (Mass. Sup. Ct. Suffolk Cnty.), which asserts claims (the “**Claims**”) based on events allegedly occurring after May 15, 2007 (the “**Period**”). I submit this declaration in support of my motion to dismiss the First Amended Complaint based on lack of personal jurisdiction filed in that action.

2. I currently reside in New York. During the Period, I have not resided in Massachusetts, owned or rented property in Massachusetts, or maintained an office in Massachusetts. I attended a university in Massachusetts from September 1989 through June 1993.

I resided in Massachusetts only during the school year and did not intend to make Massachusetts my permanent home. To the best of my recollection, I did not vote in Massachusetts or receive an identification card issued by the Commonwealth of Massachusetts. I owned an apartment in Massachusetts from in or about 1991 to 1999. I did not reside in that apartment after I graduated from the university in 1993.

3. I served on the Board of Directors of Purdue Pharma, Inc. ("**PPI**") throughout the Period until January 16, 2019. During the Period, I have not served as a director of Purdue Pharma L.P. ("**PPLP**" and, together with PPI, the "**Purdue Defendants**"), which has no directors. Other than serving as a Vice President of PPI and PPLP until May 31, 2007, I have not served as an employee or officer of either Purdue Defendant during the Period.

4. During the Period, to the best of my recollection, knowledge, and belief.
- a. No meetings of the Board of Directors of PPI took place in Massachusetts.
  - b. I have not conducted any business on behalf of either Purdue Defendant in Massachusetts.
  - c. I did not direct the management of any Purdue Defendant or any sales representative employed by any Purdue Defendant to visit doctors in Massachusetts, send emails for savings cards to Massachusetts practitioners, or violate the 2007 Settlement Agreement or Consent Judgment with Massachusetts. Nor did I otherwise direct any marketing, sales, or promotional activities by PPI, PPLP, or any of their subsidiaries or affiliates in Massachusetts.



- d. I did not travel to Massachusetts on behalf of either Purdue Defendant;  
my travel to Massachusetts was for personal purposes or on business  
unrelated to the manufacture, sale or marketing of opioids.
- e. I did not take any action related to the Claims in Massachusetts.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at New York, NY this 31<sup>st</sup> day of March, 2019.



Mortimer D.A. Sackler

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT  
CIVIL ACTION NO.  
1884-cv-01808(B)

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.

**DECLARATION OF BEVERLY SACKLER**

I, Beverly Sackler, declare as follows:

1. I am a defendant in the action *Commonwealth of Massachusetts v. Purdue Pharma L.P. et al.*, No. 1884-cv-01808(B) (Mass. Sup. Ct. Suffolk Cnty.), which asserts claims (the “**Claims**”) based on events allegedly occurring after May 17, 2007 (the “**Period**”). I submit this declaration in support of my motion to dismiss the First Amended Complaint filed in that action.
2. I reside in Connecticut, where I have maintained my primary residence throughout the Period. During the Period, I have not resided in Massachusetts, owned or rented property in Massachusetts, or maintained an office in Massachusetts.

3. I served as a director on the Board of Directors of Purdue Pharma Inc. (“**PPI**”) throughout the Period until October 17, 2017. I have never been an employee or officer of PPI. I have never been an employee, officer, or director of Purdue Pharma L.P. (“**PPLP**,” and together with PPI, the “**Purdue Defendants**”), which has no directors.

4. During my tenure as a director of PPI in the Period, to the best of my recollection, knowledge, and belief:

- a. No meetings of the Board of Directors of PPI took place in Massachusetts.
- b. I did not conduct any business on behalf of either Purdue Defendant in Massachusetts.
- c. I did not direct the management of either Purdue Defendant, or any sales representatives employed by either Purdue Defendant, to visit doctors in Massachusetts, send emails for savings cards to Massachusetts practitioners, or violate the 2007 Settlement Agreement and Consent Judgment with Massachusetts. Nor did I otherwise direct any marketing, sales or promotional activities by PPI, PPLP or any of their subsidiaries or affiliates, in Massachusetts.
- d. I did not travel to Massachusetts on behalf of either Purdue Defendant. I only travelled to Massachusetts for philanthropic and personal purposes.
- e. I did not take any action related to the Claims in Massachusetts.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed at

12:38pm, this 28<sup>th</sup> day of March, 2019.

Greenwich, Connecticut

B. Sackler

Beverly Sackler

812625

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT  
CIVIL ACTION NO.  
1884-cv-01808(B)

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.

**DECLARATION OF DAVID SACKLER**

I, David Sackler, declare as follows:

1. I am a defendant in the action *Commonwealth of Massachusetts v. Purdue Pharma L.P. et al.*, No. 1884-cv-01808(B) (Mass. Sup. Ct. Suffolk Cnty.), which asserts claims (the “**Claims**”) based on events allegedly occurring after May 15, 2007 (the “**Period**”). I submit this declaration in support of my motion to dismiss the First Amended Complaint filed in that action.

2. I reside in New York, where I have maintained my primary residence throughout the Period. During the Period, I have not resided in Massachusetts, owned or rented property in Massachusetts, or maintained an office in Massachusetts.

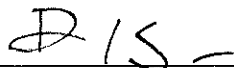


3. I served as a director on the Board of Directors of Purdue Pharma Inc. (“PPI”) from July 19, 2012 until August 14, 2018. During the Period, I have not served as an employee or officer of PPI, or as an employee, officer, or director of Purdue Pharma L.P. (“PPLP,” and together with PPI, the “Purdue Defendants”), which as has no directors.

4. During my tenure as a director of PPI, to the best of my recollection, knowledge, and belief:

- a. No meetings of the Board of Directors of PPI took place in Massachusetts.
- b. I did not conduct any business on behalf of either Purdue Defendant in Massachusetts.
- c. I did not direct the management of either Purdue Defendant, or any sales representatives employed by either Purdue Defendant, to visit doctors in Massachusetts, send emails for savings cards to Massachusetts practitioners, or violate the 2007 Settlement Agreement and Consent Judgment with Massachusetts. Nor did I otherwise direct any marketing, sales or promotional activities by PPI, PPLP or any of their subsidiaries or affiliates, in Massachusetts.
- d. I did not travel to Massachusetts on behalf of either Purdue Defendant; my travel to Massachusetts was for personal purposes or on business unrelated to the manufacture, sale or marketing of opioids.
- e. I did not take any action related to the Claims in Massachusetts.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed at  
New York, NY, this 28 day of March, 2019.

  
\_\_\_\_\_  
David Sackler

812626

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT  
CIVIL ACTION NO.  
1884-cv-01808(B)

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, JUDY LEWENT, CRAIG LANDAU,  
JOHN STEWART, MARK TIMNEY, and RUSSELL J.  
GASDIA,

Defendants.

**DECLARATION OF ILENE SACKLER LEFCOURT**

I, Ilene Sackler Lefcourt, declare as follows:

1. I am a defendant in the action *Commonwealth of Massachusetts v. Purdue Pharma L.P. et al.*, No. 1884-cv-01808(B) (Mass. Sup. Ct. Suffolk Cnty.), which asserts claims (the “**Claims**”) based on events allegedly occurring after May 15, 2007 (the “**Period**”). I submit this declaration in support of my motion to dismiss the First Amended Complaint based on lack of personal jurisdiction filed in that action.

2. I currently reside in New York. During the Period, I have not resided in Massachusetts, owned or rented property in Massachusetts, or maintained an office in Massachusetts. I have a physical disability that prevents me from travelling.

3. I served on the Board of Directors of Purdue Pharma, Inc. ("PPI") throughout the Period until October 9, 2018. During the Period, I have not served as a director of Purdue Pharma L.P. ("PPLP" and, together with PPI, the "Purdue Defendants"), which has no directors. I have not served as an employee or officer of either Purdue Defendant during the Period.

4. During the Period, to the best of my recollection, knowledge, and belief.
- a. No meetings of the Board of Directors of PPI took place in Massachusetts.
  - b. I have not conducted any business on behalf of either Purdue Defendant in Massachusetts.
  - c. I did not direct the management of any Purdue Defendant or any sales representative employed by any Purdue Defendant to visit doctors in Massachusetts, send emails for savings cards to Massachusetts practitioners, or violate the 2007 Settlement Agreement or Consent Judgment with Massachusetts. Nor did I otherwise direct any marketing, sales, or promotional activities by PPI, PPLP, or any of their subsidiaries or affiliates in Massachusetts.
  - d. I did not travel to Massachusetts on behalf of either Purdue Defendant.
  - e. I did not take any action related to the Claims in Massachusetts.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at New York, NY this 1 day of April, 2019.

  
Ilene Sackler Lefcourt

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT  
CIVIL ACTION NO.  
1884-cv-01808(B)

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.

**DECLARATION OF PETER BOER**

I, Peter Boer, declare as follows:

1. I am a defendant in the action *Commonwealth of Massachusetts v. Purdue Pharma L.P. et al.*, No. 1884-cv-01808(B) (Mass. Sup. Ct. Suffolk Cnty.), which asserts claims (the “**Claims**”) based on events allegedly occurring after May 15, 2007 (the “**Period**”). I submit this declaration in support of my motion to dismiss the First Amended Complaint filed in that action.
2. I reside in Florida, where I have maintained my primary residence throughout the Period. During the Period, I have not resided in Massachusetts, owned or rented property in Massachusetts, or maintained an office in Massachusetts.



3. I have served as a director of the Board of Directors of Purdue Pharma Inc. (“**PPI**”) since April 18, 2008. I have never been an employee or officer of PPI. I have never been an employee, officer, or director of Purdue Pharma L.P. (“**PPLP**,” and together with PPI, the “**Purdue Defendants**”), which has no directors.

4. During my tenure as a director of PPI, to the best of my recollection, knowledge, and belief:

- a. No meetings of the Board of Directors of PPI took place in Massachusetts.
- b. I did not conduct business on behalf of either Purdue Defendant in Massachusetts except in connection with an investment by PPLP in Infinity Pharmaceuticals, Inc. (“**Infinity**”), which ended in approximately 2013. My understanding is that Infinity was a company specializing in cancer treatments and was not involved with the manufacture, sale or marketing of opioids. I traveled to Massachusetts on approximately 2 occasions between 2009 and 2011 in connection with the Infinity investment.
- c. I did not direct the management either Purdue Defendant, or any sales representatives employed by either Purdue Defendant, to visit doctors in Massachusetts, send emails for savings cards to Massachusetts practitioners, or violate the 2007 Settlement Agreement and Consent Judgment with Massachusetts. Nor did I otherwise direct any marketing, sales or promotional activities by PPI, PPLP or any of their subsidiaries or affiliates, in Massachusetts.
- d. Except as set forth in ¶4(b), above, I did not travel to Massachusetts on behalf of either Purdue Defendant; my trips to Massachusetts were for

personal purposes, or involved travel through Massachusetts airports en route to and from destinations outside of Massachusetts.

- e. I did not take any action related to the Claims in Massachusetts.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed at

Alexandria Va this 28 day of March, 2019.

Peter Boer  
Peter Boer

812629

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT  
CIVIL ACTION NO.  
1884-cv-01808(B)

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.

**DECLARATION OF PAULO COSTA**

I, Paulo Costa, declare as follows:

1. I am a defendant in the action *Commonwealth of Massachusetts v. Purdue Pharma L.P. et al.*, No. 1884-cv-01808(B) (Mass. Sup. Ct. Suffolk Cnty.), which asserts claims (the “**Claims**”) based on events allegedly occurring after May 15, 2007 (the “**Period**”). I submit this declaration in support of my motion to dismiss the First Amended Complaint filed in that action.
2. I reside in Connecticut, where I have maintained my primary residence throughout the Period. During the Period, I have not resided in Massachusetts, owned or rented property in Massachusetts, or maintained an office in Massachusetts.

3. I served as a director of the Board of Directors of Purdue Pharma Inc. (“**PPI**”) between April 25, 2012 and January 30, 2018. I have never been an employee or officer of PPI. I have never been an employee, officer, or director of Purdue Pharma L.P. (“**PPLP**,” and together with PPI, the “**Purdue Defendants**”), which has no directors.

4. During my tenure as a director of PPI, to the best of my recollection, knowledge, and belief:

- a. No meetings of the Board of Directors of PPI took place in Massachusetts.
- b. I did not conduct business on behalf of either Purdue Defendant in Massachusetts.
- c. I did not direct the management of either Purdue Defendant, or any sales representatives employed by either Purdue Defendant, to visit doctors in Massachusetts, send emails for savings cards to Massachusetts practitioners, or violate the 2007 Settlement Agreement and Consent Judgment with Massachusetts. Nor did I did otherwise direct any marketing, sales or promotional activities by PPI, PPLP or any of their subsidiaries or affiliates, in Massachusetts.
- d. I did not travel to Massachusetts on behalf of either Purdue Defendant. I only travelled to Massachusetts for a personal matter—to attend a wedding—on one occasion.
- e. I did not take any action related to the Claims in Massachusetts.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed at

Greenwich, CT this 27 day of March, 2019.



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Paulo Costa

812628



COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT  
CIVIL ACTION NO.  
1884-cv-01808(B)

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,  
JUDY LEWENT, CRAIG LANDAU, JOHN STEWART,  
MARK TIMNEY, and RUSSELL J. GASDIA,

Defendants.

**DECLARATION OF CECIL B. PICKETT**

I, Cecil B. Pickett, declare as follows:

1. I am a defendant in the action *Commonwealth of Massachusetts v. Purdue Pharma L.P. et al.*, No. 1884-cv-01808(B) (Mass. Sup. Ct. Suffolk Cnty.), which asserts claims (the “**Claims**”) based on events allegedly occurring after May 15, 2007 (the “**Period**”). I submit this declaration in support of my motion to dismiss the First Amended Complaint based on lack of personal jurisdiction filed in that action.

2. I currently reside in Florida, where I have lived since 2010. I rented an apartment in Massachusetts from in or about September 2006 to October 2009. During that time, I worked for a company that is not affiliated with Purdue Pharma Inc. (“**PPI**”), Purdue Pharma L.P. (“**PPLP**” and,

together with PPI, the “**Purdue Defendants**”), or any of their subsidiaries or affiliates. I never intended Massachusetts to be my permanent home and never received a driver’s license from the Commonwealth of Massachusetts. After my work for that company ended in October 2009, I returned to my home in New Jersey, where I lived until I moved to Florida in 2010.

3. I have served on the Board of Directors of PPI since January 21, 2010. During the Period, I have not served as a director of PPLP, which has no directors. I have not served as an employee or officer of either Purdue Defendant during the Period.

4. During my tenure as a director of PPI in the Period, to the best of my recollection, knowledge, and belief:

- a. No meetings of the Board of Directors of PPI took place in Massachusetts.
- b. I did not conduct business on behalf of either Purdue Defendant in Massachusetts except in connection with an investment by PPLP in Infinity Pharmaceuticals, Inc. (“**Infinity**”), which ended in approximately 2013. My understanding is that Infinity was a company specializing in cancer treatments and was not involved with the manufacture, sale or marketing of opioids. I travelled to Massachusetts on approximately 2 occasions in connection with the Infinity investment.
- c. I did not direct the management of any Purdue Defendant or any sales representative employed by any Purdue Defendant to visit doctors in Massachusetts, send emails for savings cards to Massachusetts practitioners, or violate the 2007 Settlement Agreement or Consent Judgment with Massachusetts. Nor did I otherwise direct any marketing,

sales, or promotional activities by PPI, PPLP, or any of their subsidiaries or affiliates in Massachusetts.

d. Except as set forth in ¶4(b), above, I did not travel to Massachusetts on behalf of either Purdue Defendant; my travel to Massachusetts was for personal purposes or on business unrelated to the manufacture, sale or marketing of opioids.

e. I did not take any action related to the Claims in Massachusetts.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Sarasota, FL this 27 day of March, 2019.



Cecil B. Pickett

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT  
CIVIL ACTION NO.  
1884-cv-01808(B)

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.

**DECLARATION OF RALPH SNYDERMAN**

I, Ralph Snyderman, declare as follows:

1. I am a defendant in the action *Commonwealth of Massachusetts v. Purdue Pharma L.P. et al.*, No. 1884-cv-01808(B) (Mass. Sup. Ct. Suffolk Cnty.), which asserts claims (the “**Claims**”) based on events allegedly occurring after May 15, 2007 (the “**Period**”). I submit this declaration in support of my motion to dismiss the First Amended Complaint filed in that action.
2. I reside in North Carolina, where I have maintained my primary residence throughout the Period. During the Period, I have not resided in Massachusetts, owned or rented property in Massachusetts, or maintained an office in Massachusetts.

3. I served as a director on the Board of Directors of Purdue Pharma Inc. (“**PPI**”) between August 1, 2012 and October 30, 2017. I have never been an employee or officer of PPI. I have never been an employee, officer, or director of Purdue Pharma L.P. (“**PPLP**,” and together with PPI, the “**Purdue Defendants**”), which has no directors.

4. During my tenure as a director of PPI, to the best of my recollection, knowledge, and belief:

- a. No meetings of the Board of Directors of PPI took place in Massachusetts.
- b. I did not conduct any business on behalf of either Purdue Defendant in Massachusetts.
- c. I did not direct the management of either Purdue Defendant, or any sales representatives employed by any Purdue Defendant, to visit doctors in Massachusetts, send emails for savings cards to Massachusetts practitioners, or violate the 2007 Settlement Agreement and Consent Judgment with Massachusetts. Nor did I otherwise direct any marketing, sales or promotional activities by PPI, PPLP or any of their subsidiaries or affiliates, in Massachusetts.
- d. I did not travel to Massachusetts on behalf of either Purdue Defendant. I only travelled to Massachusetts for academic and scientific purposes and on business unrelated to the manufacture, sale or marketing of opioids.
- e. I did not take any action related to the Claims in Massachusetts.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed at

Durham NC this ~~28~~<sup>29<sup>th</sup></sup> day of March, 2019.

  
\_\_\_\_\_  
Ralph Snyderman

812630

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT  
CIVIL ACTION NO.  
1884-cv-01808(B)

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, JUDY LEWENT, CRAIG LANDAU,  
JOHN STEWART, MARK TIMNEY, and RUSSELL J.  
GASDIA,

Defendants.

**DECLARATION OF JUDITH C. LEWENT**

I, Judith C. Lewent, declare as follows:

1. I am a defendant in the action *Commonwealth of Massachusetts v. Purdue Pharma L.P. et al.*, No. 1884-cv-01808(B) (Mass. Sup. Ct. Suffolk Cnty.), which asserts claims (the “**Claims**”) based on events allegedly occurring after May 15, 2007 (the “**Period**”). I submit this declaration in support of my motion to dismiss the First Amended Complaint based on lack of personal jurisdiction filed in that action.
2. I currently reside in Florida. During the Period, I have not resided in Massachusetts, owned or rented property in Massachusetts, or maintained an office in Massachusetts.

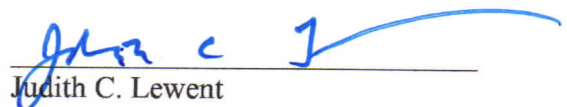
3. I served on the Board of Directors of Purdue Pharma, Inc. (“PPI”) from March 20, 2009 to December 31, 2014. During the Period, I have not served as a director of Purdue Pharma L.P. (“PPLP” and, together with PPI, the “Purdue Defendants”), which has no directors. I have not served as an employee or officer of either Purdue Defendant during the Period.

4. During my tenure as a director of PPI in the Period, to the best of my recollection, knowledge, and belief

- a. No meetings of the Board of Directors of PPI took place in Massachusetts.
- b. I have not conducted any business on behalf of either Purdue Defendant in Massachusetts.
- c. I did not direct the management of any Purdue Defendant or any sales representative employed by any Purdue Defendant to visit doctors in Massachusetts, send emails for savings cards to Massachusetts practitioners, or violate the 2007 Settlement Agreement or Consent Judgment with Massachusetts. Nor did I otherwise direct any marketing, sales, or promotional activities by PPI, PPLP, or any of their subsidiaries or affiliates in Massachusetts.
- d. I did not travel to Massachusetts on behalf of either Purdue Defendant; my travel to Massachusetts was for personal purposes or on business unrelated to the manufacture, sale or marketing of opioids.
- e. I did not take any action related to the Claims in Massachusetts.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at PALM BEACH, FL this 27<sup>th</sup> day of March, 2019.

  
Judith C. Lewent