

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT DEPARTMENT
BUSINESS LITIGATION SESSION
C.A. NO. 1884-cv-01808-BLS2

COMMONWEALTH OF MASSACHUSETTS,)
)
)
 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)
)
)
)

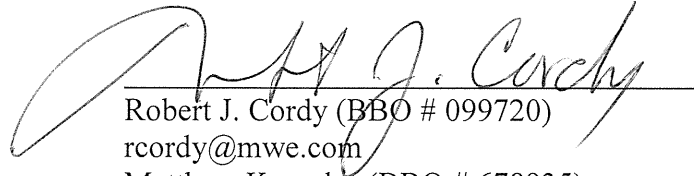
**OUTSIDE DIRECTORS' REPLY IN SUPPORT OF
THEIR SUPPLEMENTAL MOTION TO DISMISS**

The Commonwealth did not serve an opposition addressing the issues and grounds as set forth in the Outside Director's Supplemental Motion to Dismiss. The Outside Directors, Peter Boer, Paulo Costa, Judith Lewent, Cecil Pickett and Ralph Snyderman, firmly contend that, as set forth in their motion, the Commonwealth's attempt to assert personal jurisdiction over—and impose personal liability on them is a major overreach that runs afoul of corporate jurisdictional and governance law on which companies and their directors have long relied.

Respectfully submitted,

DEFENDANTS PETER BOER, PAULO COSTA,
JUDITH LEWENT, CECIL PICKETT AND
RALPH SNYDERMAN

By their attorneys,

A handwritten signature in black ink, appearing to read "R. J. Cordy", is written over a horizontal line.

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Dated: July 12, 2019

CERTIFICATE OF SERVICE

I, Robert J. Cordy, hereby certify that on this 12 day of July, 2019, I served the foregoing document upon all parties by email to:

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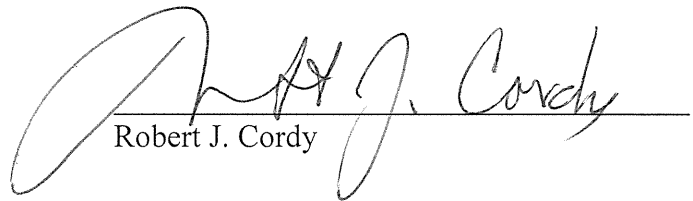
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