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

EXHIBITS TO AFFIDAVIT OF GILLIAN FEINER

CERTIFICATE OF SERVICE

I, Gillian Feiner, Assistant Attorney General, hereby certify that I have this day, May 10, 2019, served the foregoing document upon all parties by email and first class mail to:

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Gillian Feiner, AAG

Exhibit 1

COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

CIVIL INVESTIGATIVE DEMAND

CID No. 2015-HCD-10
Date Issued: March 25, 2015

TO: Purdue Pharma, L.P.
c/o Philip C. Strassburger
General Counsel
One Stamford Forum
201 Tresser Boulevard
Stamford, CT 06901.

YOU ARE HEREBY REQUIRED to produce documentary materials as described in this Civil Investigative Demand ("CID") to the Attorney General of the Commonwealth of Massachusetts in accordance with the Instructions and Definitions in this CID. The Attorney General has issued this CID pursuant to Massachusetts General Laws, Chapter 93A, Section 6, which authorizes the Attorney General to investigate possible unfair or deceptive methods, acts, or practices in violation of Chapter 93A, Section 2(a). This investigation relates to allegations of unfair or deceptive acts or practices in the marketing and sale of Oxycontin in Massachusetts.

DOCUMENTARY MATERIALS: You are hereby required to produce and deliver, for examination and copying, the requested documentary material in your possession, custody, or control to Eric Gold, Assistant Attorney General, Office of the Attorney General, One Ashburton Place, Boston, Massachusetts 02108 on or before April 24, 2015. The materials provided to the Attorney General should be accompanied by an affidavit signed by the corporate officer responsible for the oversight of the document production. The affidavit should state that the production is full and complete, and, to the extent that any documents are withheld from production under a claim of privilege, the affidavit should specify the nature of each document and the applicable legal privilege. The produced materials will be reviewed by AAG Gold and such other attorneys, employees, agents, and experts of the Office of the Attorney General as needed as part of this investigation.

This CID is made by the Attorney General as part of this Office's oversight of the health care system in its capacity as a "health oversight agency" as that term is defined in the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") pursuant to 45 C.F.R. § 164.512(d). Providing the requested information is also a permitted disclosure under HIPAA because it is "required by law" pursuant to 45 C.F.R. § 164.512(a) and made "for law enforcement purposes," pursuant to 45 C.F.R. § 164.512(f).

INSTRUCTIONS

1. The documents submitted in response to this CID shall include all relevant documents in Your possession, custody, or control, including but not limited to documents maintained or stored at Your offices, or at any other location(s) where You do business or

maintain or store documents.

2. In each instance in which a document is produced in response to a request, the current edition should be produced together with all earlier editions, drafts, or predecessor documents during the relevant time period, even though the title of the earlier documents may differ from current versions.

3. To the extent that documents are found in file folders and other similar containers that have labels or other identifying information, the documents shall be produced with such file folder and label information intact.

4. The documents submitted in response to this CID shall be marked or organized in such a way as to identify the document request (by number) to which each document is responsive.

5. Unless otherwise specified and agreed by the Office of the Attorney General, responsive documents maintained as electronic documents in the regular course of business must be produced as electronic documents. Documents maintained in hard copy may be produced in either electronic or hard copy format. To the extent hard copy and electronic documents are produced in electronic format, the Attorney General requests that all such documents be produced in electronic format suitable for loading into ONE Platform by Driven, Inc., including a text file and a load file containing all metadata. All Excel spreadsheets should be produced in native file format. See the attached AGO Data Delivery Specification for further technical specifications applicable to production of documents in electronic format.

6. If You withhold any requested document under any claim of privilege, please provide a list identifying each document for which You are claiming privilege, the author(s) and recipient(s) of the document, the date of the document, the nature of the document, the subject matter of the document, and the nature and basis of the privilege.

7. If any document requested in this CID is no longer in Your possession or custody or subject to Your control, please identify the document by its author(s), recipients(s), date and subject matter, and state whether the document is lost, has been destroyed, or has been transferred to others (and, if the latter, identify the transferee(s)).

8. Please mark each page with an identifying "Bates" mark and number each page sequentially. The marks should not obscure any information on the document.

9. Unless otherwise specified, this CID applies to documents in effect, created, recorded, compiled, transmitted, and/or received at any time from January 1, 2011 to the present. This document request is continuing in nature so as to require supplementing documents if You obtain further responsive documents.

10. If You believe that the production of documents as required by this Civil Investigative Demand would be unduly burdensome, or if You require clarification of any request, please contact Assistance Attorney General Gold within ten (10) days of receipt hereof.

DEFINITIONS

1. "Communication" means the transmittal of information (in the form of facts, opinions, ideas, inquiries, or otherwise).

2. "Concerning" means referring to, describing, offering evidence of, or constituting.

3. The "Consent Judgment" means the Consent Judgment in the case of *Commonwealth v. Purdue Pharma L.P. et al.*, Civil Action No. 07-1967(B) (Mass. Super. Ct.) entered on May 15, 2007.

4. "Document(s)" is defined to be synonymous in meaning and equal in scope to the usage of this term in Mass. R. Civ. P. 34 (a). An earlier draft is a separate document within the meaning of this term.

5. "FDA" means the United States Food & Drug Administration.

6. "Massachusetts Customer" means any (a) Massachusetts Prescriber, (b) representatives of any Massachusetts entity that purchases pharmaceutical products, including hospitals, long-term care facilities, or pharmacies, or (c) representatives of any Massachusetts entity that make decisions concerning the payment for pharmaceutical products, including third party payors' P&T committees,

7. "Massachusetts Prescriber" means any individual who is licensed to prescribe controlled substances, including Oxycontin, in the Commonwealth of Massachusetts.

8. "Sales Representative" means any of Your employees or agents who, among their primary responsibilities, are to communicate directly, or supervise any employees or agents who communicate directly, with any Massachusetts Customers concerning Oxycontin.

9. "Oxycontin" means any medication containing the active ingredient oxycodone that is marketed by You in the United States.

10. "Remuneration" means anything of value, including but not limited to, monetary payments, consulting fees, payments relating to membership in advisory boards, grants, speaking fees, food, drink, gifts, or reimbursements for travel expenses.

11. "You," or "Your" means Purdue Pharma L.P. and all of its predecessors, successors, parent corporations, affiliates, subdivisions, subsidiaries, officers, directors, agents, servants and/or employees.

12. To the extent necessary to bring into the scope of the document requests any document that might otherwise be construed to be outside their scope (a) the word "or" means "and/or," (b) the word "and" means "and/or," (c) the word "all" means "any and all," (d) the word "any" means "any and all," (e) the word "each" means "each and every," (f) the word "every" means "each and every" and (g) the singular form of a word includes the plural form, and the plural includes the singular.

REQUESTS TO PRODUCE DOCUMENTS

Please produce the following:

1. All documents concerning any Massachusetts Customer identified by You as potentially contributing to the abuse or diversion of Oxycontin, including but not limited to, all documents concerning the OxyContin Abuse and Diversion Detection Program described in paragraph 13 of the Consent Judgment that relate to any Massachusetts Customer.

2. All documents concerning the training or education of Your Sales Representatives concerning the abuse or diversion of Oxycontin, including but not limited to training and education with respect to the OxyContin Abuse and Diversion Detection Program described in paragraph 14 of the Consent Judgment.

3. Copies of any written materials provided to any Massachusetts Customer concerning the detection and prevention of the abuse and diversion of Oxycontin, including but not limit to, the non-branded educational information described in paragraph 15 of the Consent Judgment.

4. All reports or analyses concerning the addiction, abuse, or misuse of Oxycontin.

5. All communications between You and the FDA concerning the risk of addiction, abuse, or misuse of Oxycontin.

6. All communications between You and the FDA concerning the risk evaluation and mitigation strategy (REMS) for Oxycontin.

7. All marketing plans for Oxycontin.

8. A sample of each advertisement, marketing, or promotional material, including, but not limited to, advertisements appearing on radio, television, newspapers, magazines, or the internet, brochures, direct mailing, DVDs, CDs, emails, faxes, publications, business cards, sales aids, slim jims, or any other materials, concerning Oxycontin authorized for use in Massachusetts, along with a copy of the Form 2253 submitted to FDA for each such material.

9. Documents sufficient to show the date, time, manner, and location of dissemination in Massachusetts of all materials identified in response to Request No. 8.

10. Documents sufficient to identify all of Your Sales Representatives who have promoted (either now or in the past) Oxycontin. For each individual, provide documents sufficient to identify the Sales Representative's name, job title, dates of employment, geographic region in which he or she promoted Oxycontin, number of units of Oxycontin he or she sold in each of the past four years, compensation (including bonus or incentives received), supervisor, direct reports (if any), home address, and home (or cellular) telephone number.

11. All policies and procedures concerning the compensation of Your Sales Representatives, including but not limited to policies and procedures concerning the calculation of sales bonuses or sales incentive payments.

12. All documents concerning the training or education of Your Sales Representatives concerning Oxycontin, including, but not limited to, scripts, videos, talking points, presentations, memoranda, power point slides, e-mails, and text messages.

13. All documents concerning all meetings, conversations or other communications between You and Massachusetts Customers at which Oxycontin was discussed, including, but not limited to, any "call notes," or other notes, reports or analyses of such communications.

14. All documents concerning the identification or selection of Massachusetts Customers for sales calls, consulting agreements or promotion of Oxycontin.

15. Documents sufficient to identify the 50 Massachusetts Prescribers who have written the most prescriptions for Oxycontin since January 1, 2011. This information should include, but is not limited to the following: (a) name, hospital/medical group affiliation, and address of the Massachusetts Prescriber; (b) the medical specialty of the Massachusetts Prescriber; (c) the number of prescriptions written by the Massachusetts Prescriber, by dosage and in total in each month; (d); the number of new prescriptions written by the Massachusetts Prescriber in each month; and (e) the patients' diagnoses for each prescription.

16. Documents sufficient to identify the date, time, location, and topic of discussion for each educational, informational or consulting meeting or conference concerning Oxycontin in Massachusetts known to You.

17. Documents sufficient to identify the name, hospital/medical group affiliation, address, and medical specialty of all attendees and presenters at any meetings or conferences identified in response to Request No. 16.

18. Documents sufficient to show all Remuneration given by You to any Massachusetts Prescriber.

19. Documents sufficient to identify the wholesale acquisition cost of Oxycontin (in each dose) for each month from 2011 to the present.

20. Documents sufficient to identify the number of prescriptions for Oxycontin written in each year, quarter, and month by Massachusetts Prescribers.

21. Documents sufficient to identify the revenue (in dollars) obtained by You as a result of the prescriptions identified in response to Request No. 20.

22. Documents sufficient to identify the number of units of each dose of Oxycontin sold as a result of the prescriptions identified in response to Request No. 20.

23. All documents concerning all grievances or complaints, whether oral or written, made by or on behalf of Massachusetts Residents, including but not limited to all e-mails, letters, and all written or audio recordings of all telephone calls, concerning the addiction, abuse, or misuse of Oxycontin.

COMMONWEALTH OF MASSACHUSETTS

MAURA HEALEY
ATTORNEY GENERAL

Eric Gold
Assistant Attorney General
Health Care Division
Office of the Attorney General
One Ashburton Place
Boston, MA 02108
617-727-2200
Eric.Gold@state.ma.us

Exhibit 2

COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

SUPPLEMENTAL CIVIL INVESTIGATIVE DEMAND

CID No. 2015-HCD-10
Date Supplement Issued:
August 8, 2017

TO: Purdue Pharma, L.P.
c/o Timothy J. Shea
Morgan Lewis & Bockius LLP
One Federal St.
Boston, MA 02110

YOU ARE HEREBY REQUIRED to produce documentary materials as described in this Supplemental Civil Investigative Demand ("CID") to the Attorney General of the Commonwealth of Massachusetts in accordance with the Instructions and Definitions in this CID. The Attorney General has issued this CID pursuant to Massachusetts General Laws, Chapter 93A, Section 6, which authorizes the Attorney General to investigate possible unfair or deceptive methods, acts, or practices in violation of Chapter 93A, Section 2(a). This investigation relates to allegations of unfair or deceptive acts or practices in the marketing and sale of Opioids in Massachusetts.

DOCUMENTARY MATERIALS: You are hereby required to produce and deliver, for examination and copying, the requested documentary material in your possession, custody, or control to Eric Gold, Assistant Attorney General, Office of the Attorney General, One Ashburton Place, Boston, Massachusetts 02108 on or before August 22, 2017. The materials provided to the Attorney General should be accompanied by an affidavit signed by the corporate officer responsible for the oversight of the document production. The affidavit should state that the production is full and complete, and, to the extent that any documents are withheld from production under a claim of privilege, the affidavit should specify the nature of each document and the applicable legal privilege. The produced materials will be reviewed by AAG Gold and such other attorneys, employees, agents, and experts of the Office of the Attorney General as needed as part of this investigation.

The Attorney General has issued this CID as part of the Office of the Attorney General's oversight of the Massachusetts health care system as a "health oversight agency," as that term is defined and used in 45 C.F.R. §§ 164.501 and 164.512(d) of the federal Standards for Privacy of Individually Identifiable Health Information that implements the privacy requirements of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Providing the requested information is also a permitted disclosure under HIPAA because it is "required by law" pursuant to 45 C.F.R. § 164.512(a) and made "for law enforcement purposes," pursuant to 45 C.F.R. § 164.512(f), including that it complies with the HIPAA standard for disclosures to law enforcement officials set forth in 45 C.F.R. § 164.512(f)(1)(ii)(C), namely, that the information sought is relevant and material to a legitimate law enforcement inquiry, the request is specific and limited in scope to the extent reasonably practicable, and de-identified

information cannot reasonably be used to complete the investigation.

INSTRUCTIONS

1. The documents submitted in response to this CID shall include all relevant documents in Your possession, custody, or control, including but not limited to documents maintained or stored at Your offices, or at any other location(s) where You do business or maintain or store documents.

2. In each instance in which a document is produced in response to a request, the current edition should be produced together with all earlier editions, drafts, or predecessor documents during the relevant time period, even though the title of the earlier documents may differ from current versions.

3. To the extent that documents are found in file folders and other similar containers that have labels or other identifying information, the documents shall be produced with such file folder and label information intact.

4. The documents submitted in response to this CID shall be marked or organized in such a way as to identify the document request (by number) to which each document is responsive.

5. Unless otherwise specified and agreed by the Office of the Attorney General, responsive documents maintained as electronic documents in the regular course of business must be produced as electronic documents. Documents maintained in hard copy may be produced in either electronic or hard copy format. To the extent hard copy and electronic documents are produced in electronic format, the Attorney General requests that all such documents be produced in electronic format suitable for loading into ONE Platform by Driven, Inc., including a text file and a load file containing all metadata. All Excel spreadsheets should be produced in native file format. See the attached AGO Data Delivery Specification for further technical specifications applicable to production of documents in electronic format.

6. If You withhold any requested document under any claim of privilege, please provide a list identifying each document for which You are claiming privilege, the author(s) and recipient(s) of the document, the date of the document, the nature of the document, the subject matter of the document, and the nature and basis of the privilege.

7. If any document requested in this CID is no longer in Your possession or custody or subject to Your control, please identify the document by its author(s), recipients(s), date and subject matter, and state whether the document is lost, has been destroyed, or has been transferred to others (and, if the latter, identify the transferee(s)).

8. Please mark each page with an identifying "Bates" mark and number each page sequentially. The marks should not obscure any information on the document.

9. Unless otherwise specified, this CID applies to documents in effect, created, recorded, compiled, transmitted, and/or received at any time from **January 1, 2006 to the present**. This document request is continuing in nature so as to require supplementing

documents if You obtain further responsive documents.

10. If You believe that the production of documents as required by this Civil Investigative Demand would be unduly burdensome, or if You require clarification of any request, please contact Assistance Attorney General Gold within ten (10) days of receipt hereof.

DEFINITIONS

1. "Butrans" means any medication containing the active ingredient buprenorphine that You have marketed in the United States.

2. "CME" means continuing medical education as defined by the Accreditation Council for Continuing Medical Education or any state medical society.

3. "Communication" means the transmittal of information (in the form of facts, opinions, ideas, inquiries, or otherwise).

4. "Concerning" means referring to, describing, offering evidence of, or constituting.

5. "Dilaudid" means any medication containing the active ingredient hydromorphone hydrochloride You have marketed in the United States.

6. "Document(s)" is defined to be synonymous in meaning and equal in scope to the usage of this term in Mass. R. Civ. P. 34 (a). An earlier draft is a separate document within the meaning of this term.

7. "Hysingla ER" means any medication containing the active ingredient hydrocodone bitrate that You marketed in the United States.

8. "Key Opinion Leader" shall mean prescribers or other medical professionals who are involved in scientific research and advocacy concerning opioids, chronic non-cancer pain, or any individual whom you have identified as such.

9. "Marketing Materials" as used herein means any of the following that reference Opioids:

   a. Printed and published material, audio-visual material and descriptive literature used in direct mail, newspapers, magazines, radio or TV scripts, billboards, internet, computer or electronic transmissions and similar displays;

   b. Descriptive literature and sales aids of all kinds issued for presentation to health care providers, including, without limitation, circulars, leaflets, booklets, depictions, illustrations, audio recordings, and form letters;

   c. Prepared sales talks, telephone scripts presentations and material; and

   d. All oral and written solicitations and presentations.

10. "Massachusetts Customer" means any (a) Massachusetts Prescriber, (b) representatives of any Massachusetts entity that purchases pharmaceutical products, including hospitals, long-term care facilities, or pharmacies, or (c) representatives of any Massachusetts entity that make decisions concerning the payment for pharmaceutical products, including third party payors' pharmacy and therapeutics committees.

11. "Massachusetts Prescriber" means any individual who is licensed to prescribe controlled substances, including Oxycontin, Butrans, Dilaudid, Hysingla ER, MS Contin and Targiniq ER, in the Commonwealth of Massachusetts.

12. "MS Contin" means any medication containing the active ingredient morphine sulfate that You marketed in the United States.

13. "Opioids" or "Opioid" means any or all of the class of drugs with opium-like qualities, including but not limited to, hydrocodone, hydromorphone, oxycodone, oxymorphone, fentanyl methadone, buprenorphine, meperidine, morphine, opium, and codeine. These include medications marketed as OxyContin, Butrans, Dilaudid, Hysingla ER, MS Contin and Targiniq ER.

14. "Oxycontin" means any medication containing the active ingredient oxycodone that YOU marketed in the United States.

15. "Ryzolt" means any medication containing the active ingredient tramadol hydrochloride that You marketed in the United States.

16. "Sales Representative" means any of Your employees or agents who, among their primary responsibilities, are to communicate directly, or supervise any employees or agents who communicate directly, with any Massachusetts Customers concerning Opioids.

17. "Targiniq ER" means any medication containing the active ingredients oxycodone hydrochloride and naloxone hydrochloride that is marketed by You in the United States.

18. "You," or "Your" means Purdue Pharma L.P. and all of its predecessors, successors, parent corporations, affiliates, subdivisions, subsidiaries, officers, directors, agents, servants and/or employees.

19. To the extent necessary to bring into the scope of the document requests any document that might otherwise be construed to be outside their scope (a) the word "or" means "and/or," (b) the word "and" means "and/or," (c) the word "all" means "any and all," (d) the word "any" means "any and all," (e) the word "each" means "each and every," (f) the word "every" means "each and every" and (g) the singular form of a word includes the plural form, and the plural includes the singular.

REQUESTS TO PRODUCE DOCUMENTS

Please produce the following:

24. Documents sufficient to identify for all Opioids You have marketed, the number of prescriptions in Massachusetts by year, quarter, month, Opioid, Massachusetts Prescriber, and prescriber specialty.

25. Documents sufficient to identify the revenue (in dollars) obtained by You, divided by each product, as a result of the prescriptions identified in response to Request No. 24.

26. Documents sufficient to identify the number of units of each Opioid dose sold as a result of the prescriptions identified in response to Request No. 24.

27. Documents sufficient to identify all Sales Representatives who have promoted Opioids in Massachusetts from January 1, 2006 to the Present. For each individual, provide documents sufficient to identify the Sales Representative's name, job title, dates of employment, geographic region in which he or she promoted Opioids, number of units of Opioids he or she sold in each of the past four years, any compliance-related concerns and related disciplinary actions or incidents, compensation (including bonus or incentives received), supervisor, direct reports (if any), home address, and home (or cellular) telephone number.

28. All documents concerning all meetings, conversations or other communications between You and Massachusetts Customers at which Opioids were discussed, including, but not limited to, any "call notes," compliance-related reports, or other notes, reports or analyses of such communications.

29. Documents sufficient to identify all Key Opinion Leaders who have operated or promoted Opioids You marketed in Massachusetts.

30. For all marketing, sales and research-related expenditures (whether in the form of grant funding, cash or in-kind compensation) exceeding $500.00 paid to or for the benefit of non-employees (including but not limited to prescribers, Key Opinion Leaders, and third party pain societies) operating or otherwise promoting Opioids You marketed in Massachusetts please provide:

a. Documents reflecting all amounts paid and the identity of the recipients;

b. All documents concerning relevant terms and conditions of such payments, including, but not limited to, contracts and written agreements; and

c. All related documents and correspondence.

31. All reports, spreadsheets, or other documents identifying Massachusetts Customers who participated in or attended any events (including, but not limited to, promotional speaker programs, speaker bureau dinners, conference presentations, or drug talks) or Continuing Medical Education ("CME") programs that You conducted or otherwise sponsored concerning opioids or chronic, non-cancer pain in Massachusetts or elsewhere.

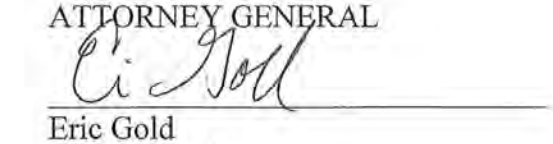
32. Documents sufficient to show how You identify or select Massachusetts Customers for sales calls, consulting agreements or promotion of Opioids, including, without limitation, prescribing behavior models You use to identify or select Massachusetts Customers.

33. Documents sufficient to show: (a) total copay assistance provided to purchasers of Opioids in Massachusetts, and (b) impact of copay assistance on sales of Opioids in Massachusetts.

34. All documents concerning any Massachusetts Customer identified by You as potentially contributing to the abuse or diversion of Opioids, including but not limited to, all documents concerning the OxyContin Abuse and Diversion Detection Program described in paragraph 13 of the Consent Judgment that relate to any Massachusetts Customer.

COMMONWEALTH OF MASSACHUSETTS

MAURA HEALEY
ATTORNEY GENERAL



Eric Gold
Division Chief
Health Care Division
Office of the Attorney General
One Ashburton Place
Boston, MA 02108
617-963-2663
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Exhibit 3

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL
ONE ASHBURTON PLACE
BOSTON, MASSACHUSETTS 02108

MAURA HEALEY
ATTORNEY GENERAL

(617) 727-2200
(617) 727-4765 TTY
www.mass.gov/ago

SUPPLEMENTAL CIVIL INVESTIGATIVE DEMAND

CID No. 2017-FCD-42
Date Issued: September 18, 2017

VIA EMAIL AND CERTIFIED MAIL

TO: Purdue Pharma, L.P.
c/o Sarah G. Reznek
Morgan, Lewis & Bockius LLP
Morgan Lewis Consulting LLC
1111 Pennsylvania Avenue, NW
Washington, DC 20004-2541
sarah.reznek@morganlewis.com

YOU ARE HEREBY REQUIRED to produce documentary materials as described in this Supplemental Civil Investigative Demand ("CID") to the Attorney General of the Commonwealth of Massachusetts in accordance with the Instructions and Definitions in this CID. The Attorney General has issued this CID pursuant to Massachusetts General Laws, Chapter 93A, Section 6, which authorizes the Attorney General to investigate possible unfair or deceptive methods, acts, or practices in violation of Chapter 93A, Section 2(a). This investigation relates to allegations of unfair or deceptive acts or practices in the marketing and sale of opioids in Massachusetts.

DOCUMENTARY MATERIALS: You are hereby required to produce and deliver, for examination and copying, the requested documentary material in Your possession, custody, or control to Gillian Feiner, Assistant Attorney General, Office of the Attorney General, One Ashburton Place, Boston, Massachusetts 02108 within 30 days for the Requests set forth in Part A and within 60 days for the requests set forth in Part B, below. The materials provided to the Attorney General should be accompanied by an affidavit signed by the corporate officer responsible for the oversight of the document production. The affidavit should state that the production is full and complete, and, to the extent that any documents are withheld from production under a claim of privilege, the affidavit should specify the nature of each document and the applicable legal privilege. The produced materials will be reviewed by AAG Feiner and such other attorneys, employees, agents, and experts of the Office of the Attorney General as needed as part of this investigation.

The Attorney General has issued this CID as part of the Office of the Attorney General's oversight of the Massachusetts health care system as a "health oversight agency," as that term is

defined and used in 45 C.F.R. §§ 164.501 and 164.512(d) of the federal Standards for Privacy of Individually Identifiable Health Information that implements the privacy requirements of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Providing the requested information is also a permitted disclosure under HIPAA because it is "required by law" pursuant to 45 C.F.R. § 164.512(a) and made "for law enforcement purposes," pursuant to 45 C.F.R. § 164.512(f), including that it complies with the HIPAA standard for disclosures to law enforcement officials set forth in 45 C.F.R. § 164.512(f)(1)(ii)(C), namely, that the information sought is relevant and material to a legitimate law enforcement inquiry, the request is specific and limited in scope to the extent reasonably practicable, and de-identified information cannot reasonably be used to complete the investigation.

INSTRUCTIONS

1. The Documents submitted in response to this CID shall include all relevant Documents in Your possession, custody, or control, including but not limited to Documents maintained or stored at Your offices, or at any other location(s) where You do business or maintain or store Documents.

2. In each instance in which a Document is produced in response to a request, the current edition should be produced together with all earlier editions, drafts, or predecessor Documents during the relevant time period, even though the title of the earlier Documents may differ from current versions.

3. To the extent that Documents are found in file folders and other similar containers that have labels or other Identifying information, the Documents shall be produced with such file folder and label information intact.

4. The Documents submitted in response to this CID shall be marked or organized in such a way as to Identify the Document request (by number) to which each Document is responsive.

5. Unless otherwise specified and agreed by the Office of the Attorney General, responsive Documents maintained as electronic Documents in the regular course of business must be produced as electronic Documents. Documents maintained in hard copy may be produced in either electronic or hard copy format. To the extent hard copy and electronic Documents are produced in electronic format, the Attorney General requests that all such Documents be produced in electronic format in accordance with the attached Special Instructions for Electronically Produced or Stored Material (**Appendix 1**).

6. If You withhold any requested Document under any claim of privilege, please provide a list Identifying each Document for which You are claiming privilege, the author(s) and recipient(s) of the Document, the date of the Document, the nature of the Document, the subject matter of the Document, and the nature and basis of the privilege.

7. If any Document requested in this CID is no longer in Your possession or custody or subject to Your control, please Identify the Document by its author(s), recipients(s), date and subject matter, and state whether the Document is lost, has been destroyed, or has been

transferred to others (and, if the latter, Identify the transferee(s)).

8. Please mark each page with an Identifying "Bates" mark and number each page sequentially. The marks should not obscure any information on the Document.

9. Unless otherwise specified therein, this CID seeks information and Documents in effect, created, recorded, compiled, transmitted, and/or received, the **Relevant Time Period** for the Requests herein are as follows:

a. **for Part A**: the date You began selling Your Opioids; and

b. **for Part B**: January 1, 2006 to the present.

This request is continuing in nature so as to require supplementing Documents if You obtain further responsive Documents.

10. If You believe that the production of Documents as required by this Civil Investigative Demand would be unduly burdensome, or if You require clarification of any request, please contact Assistant Attorney General Feiner within ten (10) days of receipt hereof.

DEFINITIONS

1. “Butrans” means any medication containing the active ingredient buprenorphine that is Marketed by You in the United States.

2. "CME" means continuing medical education as defined by the Accreditation Council for Continuing Medical Education or any state medical society.

3. “Communication” means the transmittal of information (in the form of facts, opinions, ideas, inquiries, or otherwise).

4. “Concerning” means referring to, describing, offering evidence of, or constituting.

5. “Customer” means any (a) HCP, (b) representatives of any State entity that purchases pharmaceutical products, including hospitals, long-term care facilities, or pharmacies, or (c) representatives of any State entity that make decisions concerning the payment for pharmaceutical products, including third party payors’ pharmacy and therapeutics committees.

6. “Dilaudid” means any medication containing the active ingredient hydromorphone hydrochloride that is Marketed by You in the United States.

7. “Document(s)” is defined to be synonymous in meaning and equal in scope to the usage of this term in Mass. R. Civ. P. 34 (a). An earlier draft is a separate Document within the meaning of this term.

8. “Health care provider” and “HCP” means any physician, surgeon, nurse practitioner, physician assistant, physiatrist, psychiatrist, dentist, pharmacist, podiatrist, nurse, or other person engaged in the business of providing health care services and/or prescribing Opioids in the States, and any medical facility, hospital, or clinic, including but not limited to the current and former officers, directors, agents, representatives, or employees of any of the foregoing.

9. “Hysingla ER” means any medication containing the ingredient hydrocodone bitrate that is Marketed by You in the United States.

10. “Identify” when referring to a natural person means to state that person’s full name and present or last known residence address, telephone number, business address, position and phone number.

11. “Identify” when referring to an entity means to give, the entity’s full name, to the extent known, including (when not apparent from the name) the nature of the entity, e.g., corporation, limited liability corporation, partnership, or professional corporation, present or last known address of its headquarters or principal place of business, and the state in which the entity is incorporated or otherwise created.

12. “Identify” when referring to Documents means to give, to the extent known: (a) the type of Document; (b) the general subject matter; (c) the date of the Document; (d) the author or authors, according to the Document; and (e) the persons to whom, according to the Document, the Document (or a copy) was to have been sent.

13. "Key Opinion Leader" and "KOL" means any Health Care Providers or others persons who are involved in Scientific Research or advocacy concerning Opioids or the treatment of pain, or any persons You have identified as such.

14. "Market," "Marketing," or "Marketed" means all efforts and communication to promote or increase the use of opioids generally or your opioid-containing products specifically, and includes branded and non-branded advertising and promotion in whatever form. It includes communications with and presentations relating to advisory groups.

15. "Marketing Materials" as used herein means any of the following, including, without limitation, branded and unbranded advertisements, that reference Opioids:

a. Printed and published material, audio-visual material and descriptive literature used in direct mail, newspapers, magazines, radio or TV scripts, billboards, internet, computer or electronic transmissions and similar displays;

b. Descriptive literature and sales aids of all kinds issued for presentation to Health Care Providers, including, without limitation, circulars, leaflets, booklets, depictions, illustrations, audio recordings, and form letters;

c. Prepared sales talks, telephone scripts presentations and material; and

d. All oral and written solicitations and presentations.

16. "Medical education" means medical education programs and speaking events, regardless of whether these programs involve the award of CME credits and are provided by commercial vendors, Pain Advocacy Organizations, professional organizations, academic organizations, health systems, or You. Medical education also includes "grand rounds" or small meetings by Your medical science liaisons, regardless of whether the medical science liaison is an employee or consultant, at hospitals or clinics and any communication distributed to HCPs regarding the clinical and scientific attributes of opioids generally or the Opioids specified in this CID.

17. "MS Contin" means any medication containing the active ingredient morphine sulfate that is Marketed by You in the United States.

18. "Opioids" or "Opioid" means all naturally occurring, synthetic, or semisynthetic substances that bind to Opioid receptors with opium-like qualities, including but not limited to, hydrocodone, hydromorphone, oxycodone, oxymorphone, fentanyl, methadone, buprenorphine, meperidine, morphine, opium, codeine and combination Opioid analgesics, immediate and extended release. These include medications Marketed as Oxycontin, Butrans, Dilaudid, Hysingla ER, MS Contin, Ryzolt and Targiniq ER.

19. "Oxycontin" means any medication containing the active ingredient oxycodone that is Marketed by You in the United States.

20. "Pain Advocacy Organization" means any group that advocates on behalf of pain patients/consumers by lobbying governmental entities and/or distributing educations materials to

patients/consumers, Customers, or others relating to the experience and/or treatment of pain and/or associated conditions.

21. "Ryzolt" means any medication containing the active ingredient tramadol hydrochloride that is Marketed by You in the United States.

22. "Sales Representative" means any of Your employees or agents who, among their primary responsibilities, are to communicate directly, or supervise any employees or agents who communicate directly, with any Customers concerning Opioids.

23. "Scientific Research" means studies, investigations, trials, articles, comparisons, case histories, reviews, reports or analyses that are conducted by doctors, researchers, or other investigators.

24. "States" means Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Montana, Nebraska, Nevada, New Jersey, New York, North Carolina, North Dakota, Oregon, Pennsylvania, Rhode Island, South Dakota, Tennessee, Texas, Utah, Vermont, Virginia, Washington, Wisconsin, Wyoming, and the District of Columbia.

25. "Targiniq ER" means any medication containing the active ingredient oxycodone hydrochloride and naloxone hydrochloride that is Marketed by You in the United States.

26. "You," or "Your" or "Purdue" means Purdue Pharma L.P. and all of its predecessors, successors, parent corporations, affiliates, subdivisions, subsidiaries, officers, directors, agents, servants and/or employees.

27. To the extent necessary to bring into the scope of the Document requests any Document that might otherwise be construed to be outside their scope (a) the word "or" means "and/or," (b) the word "and" means "and/or," (c) the word "all" means "any and all," (d) the word "any" means "any and all," (e) the word "each" means "each and every," (f) the word "every" means "each and every" and (g) the singular form of a word includes the plural form, and the plural includes the singular.

REQUESTS FOR PRODUCTION

Please produce the following for the **Relevant Time Period**, unless otherwise specified. In lieu of providing Documents, You may provide a detailed written answer or spreadsheet, where appropriate and responsive.

Part A (produce within 30 days)

35. Documents sufficient to reflect all Opioids that You sell, Market, or distribute or have sold, Marketed, or distributed, by year, including:

    a. The brand name and generic name for each Opioid;

b. The brand name and generic name of each reformulation of such Opioid, if any, and the date and purpose or nature of each reformulation;
c. All available doses and forms of such Opioid for each brand name and each reformulation;
d. The National Drug Code packaging code(s) for each dose and form of each Opioid; and
e. The time period during which You sold, Marketed, or promoted each Opioid. If another company sold, Marketed, or promoted the Opioid before or after You did, please indicate the time period during which another company sold, Marketed, or promoted the Opioid.

36. Documents sufficient to reflect the monthly sales nationally and for each State (as determined by the state where the HCP prescribing the Opioid is located) for each Opioid Identified in Request 35:

a. In units, including the morphine milligram equivalent (MME) of each unit, nationally and in each State;
b. In units, including the MME of each unit, by each individual HCP, including that HCP's specialty (*e.g.*, physiatrist, psychiatrist, family practice, dentist, etc.)/HCP level (*e.g.*, nurse, nurse practitioner, physician assistant, etc.), nationally and in each State;
c. In dollars nationally and by each State; and
d. In number of prescriptions written and renewed by each individual HCP nationally and in each State.

37. All sales data relating to each Opioid Identified in Request 35, including but not limited to:

a. All data showing geographical information, including but not limited to national, regional, state, zip codes, and any other geographic breakdowns that You have;
b. All data relating to HCP specialty/HCP level;
c. All data relating to patient/consumer demographics, including but not limited to age, race, gender, and veteran status;
d. All data relating to any diagnoses, including but not limited to acute versus chronic pain, palliative care, musculoskeletal pain, neuropathic pain, comorbidity, length of treatment on Opioids, and co-pharmacy or polypharmacy;
e. All data relating to specific demographic groups which may be potential consumers of Opioids, including but not limited to veterans, the disabled, scholastic, collegiate and professional athletes, children, worker's compensation recipients, and the elderly.

38. Documents sufficient to reflect the amount You spent each year on all Marketing and promotional activities for each Opioid Identified in Request 35, nationally and in each State, including documents showing the amount You paid each year to any sales, Marketing,

advertising, or public relations agency or firm for the purpose of selling, Marketing, promoting, or advertising any Opioid Identified in Request 35 or opioids generally to patients/consumers or HCPs.

39. Documents sufficient to reflect the number of Sales Representatives that detailed each Opioid Identified in Request 35 for each year nationally and in each State.

40. Documents sufficient to reflect:

a. Your current corporate structure, including any parent companies, holding companies, subsidiaries, etc., including any changes in corporate structure by date.
b. explain the significance of the change.
c. the state of incorporation, directors, and officers of each subsidiary and its subsidiaries, if applicable.
d. for each entity, its general purpose and its operations.

41. Documents sufficient to reflect the amount of monetary payments, monetary contributions, and monetary value of any other type of contribution You provided for Medical Education programs each year that referred or related to pain, the treatment of pain, Opioids generally, or any Opioid Identified in Request 35, to the extent not already requested and produced.

42. Documents sufficient to reflect the amount of monetary payments, monetary contributions, and monetary value of any other type of contribution You provided to Pain Advocacy Organizations by year and by organization, to the extent not already requested and produced.

43. For the data described in Request 37, provide each quarterly, semi-annual, and annual report, compilation, spreadsheet, or other document using such data provided to Your regional and national Sales Managers or persons holding supervisory authority over Your Sales Representatives and other detail staff on a statewide or multistate basis.

44. For each year, Documents sufficient to reflect Your share of the Opioid Market in each of the following categories (A-B) and subcategories (1-3 and a-f), by units, including the MME of each unit, and in dollars. Identify the Opioid(s) that You include in each category and subcategory.

A. Branded

1. Branded short-acting Opioids
    a. Oral (tablet)
    b. Injectable (intramuscular, subcutaneous, intravenous)
    c. Transmucosal
    d. Suppository
    e. Transdermal

f. Other

2. Branded long-acting Opioids
    a. Oral (tablet)
    b. Injectable (intramuscular, subcutaneous, intravenous)
    c. Transmucosal
    d. Suppository
    e. Transdermal
    f. Other

3. Branded rapid onset

B. Generic/unbranded

1. Generic/unbranded short-acting Opioids
    a. Oral (tablet)
    b. Injectable (intramuscular, subcutaneous, intravenous)
    c. Transmucosal
    d. Suppository
    e. Transdermal
    f. Other

2. Generic/unbranded long-acting Opioids
    a. Oral (tablet)
    b. Injectable (intramuscular, subcutaneous, intravenous)
    c. Transmucosal
    d. Suppository
    e. Transdermal
    f. Other

3. Generic rapid onset

45. For each year, Documents sufficient to reflect Your share of the overall Opioid market, by units, including the MME of each unit, and in dollars.

46. For each year, Documents sufficient to reflect Identify Your share of the abuse deterrent formula Opioid market, by units, including the MME of each unit, and in dollars.

47. For each year, Documents sufficient to reflect the: (a) total copay or other assistance provided to purchasers of each of Your Opioids, nationally and in each State, as measured in dollars, prescriptions, and units, including the MME of each unit; and (b) impact of copay or other assistance on sales of each of Your Opioids, nationally and in each State.

48. For each year, all data You obtained regarding the number of prescriptions, by State, of any Opioid, including any data purchased from IMS Health or similar entity compiling data about prescriptions, any data from distributors, any data reported to or from the

government agencies regarding the number of Opioid prescriptions, and any data used to calculate market share of Purdue's Opioid analgesics. To the extent available, please provide the name of the drug, the manufacturer (if known), the name of the HCP, the address and zip code of the HCP, dosage, the quantity of pills dispensed, and any information about whether the prescription was a switch from a different pain medication.

Part B (produce within 60 days)

49. Documents sufficient to:

a. Identify all of the officers, directors, principal stockholders, and owners of Purdue, and shareholders with five percent (5%) or more ownership of Purdue, and each such shareholder's percentage of ownership.

b. Identify all individuals responsible for keeping or auditing Your financial books and records.

50. All detailed organizational charts and personnel directories in effect during the Relevant Time Period relating to all personnel whose responsibilities involve Opioids.

51. Your audited financial statements, including income statements, cash flow statements, and balance sheets.

52. Your corporate federal and state tax returns and all Communications with federal and state tax authorities.

53. Documents sufficient to Identify Your profits from your sale of Opioids, by units, including the MME of each unit, and in dollars.

54. All valuations of Purdue or of Purdue's stocks, shares, or ownership interests performed by Purdue or at Purdue's request.

55. To the extent not already requested and produced, all Documents relating to the scientific data, Scientific Research, or scientific substantiation to support any claim made by the Documents identified in Attachment A regarding the efficacy, safety, or risks of Opioids, including that a particular claim is established by scientific data, Scientific Research, or other substantiation, and all Documents which Identify the individuals who evaluated or authorized any such claim.

56. All longitudinal studies of Opioids funded in whole or in part by Purdue and all Documents and Communications concerning the same, to the extent not already requested and produced.

57. Copies of all advertisements featured in medical journals and/or distributed in mailers for your Opioids, including, without limitation, advertisements for OxyContin featuring individuals suffering from chronic pain and advertisements for Butrans featuring individuals suffering from low back pain or osteoarthritis, to the extent not already requested and produced.

58. All Documents and Communications related to Your decision, and Your monitoring, evaluation, and targeting of any program, to pay HCPs to make Medical Education presentations, to attend speaker trainings, or to receive any other compensation in any form including from Sales Representatives.

59. All Documents, including each version, update, volume or edition, identified in Attachment A, to the extent not already requested and produced. For presentations and Medical Education materials, these include slides, handouts, videos and anything else given or shown to participants.

60. All Documents and Communications concerning Purdue's role in funding, developing and distributing Documents identified in Attachment A, to the extent not already requested and produced.

61. Documents sufficient to Identify each instance in which the Documents identified in Attachment A were distributed or otherwise presented, by State, including for each such instance, the identity of the individual who distributed it, the date it was distributed, and the name, address, and specialty (if HCP) of the Customer or recipient or attendee. Responsive documents shall include spreadsheets reflecting the number of all literature pieces distributed, like those at PWG000319334, 319337, 323877, and 323586.

62. Documents sufficient to reflect Purdue's production cost to produce each of the Documents identified in Attachment A.

63. Documents sufficient to reflect the number of times residents of each State accessed the following:

a. the website, *In the Face of Pain*, at www.inthefaceofpain.org or related domain names;

b. the website, *Partners Against Pain*, at www.partnersagainstpain.com or related domain names;

c. the article on the *Partners Against Pain* website entitled *Clinical Issues in Opioid Prescribing;*

d. the article on the *Partners Against Pain* website entitled *Pain Management Kit;* and

e. the article on the *Partners Against Pain* website entitled *Opioid Analgesics and Pain Management: Addressing Barriers to Relief with Patients and Families, a Guide for Healthcare Professionals*.

If no such Documents exist, Documents sufficient to reflect the time period during which the above websites were accessible to the public or, regarding specified articles, the time period during which the articles were available to the public on the specified website and on any other website.

64. All Documents reflecting any analysis, analytics, or return on investment as to the advertisements identified in Request No. 57, the websites identified in Request No. 63 and the distribution of the materials listed in Attachment A.

65. All Documents and Communications concerning Opioids or chronic pain that were or are maintained by the following Purdue employees:

a. Pamela Bennett
b. Nancy Crudele
c. J. David Haddox
d. Jim Heins
e. Lisa Miller
f. Alan Must
g. Burt Rosen
h. Richard Sackler
i. Sherry Siegel
j. Kimberley Tiller
k. Andrew Udell

66. All Documents and Communications by or concerning Scott Fishman, Perry Fine, David Fishbain, Russell Portenoy, and Lynn Webster.

67. Documents sufficient to Identify Your regional and district sales directors and managers, to the extent not already requested and produced.

68. All Documents that show any Communications concerning Marketing Opioids that were or are maintained by Your regional and district sales directors and managers, to the extent not already requested and produced.

69. All Documents that show any Communication regarding Opioid Scientific Research, KOLs, sales, and Marketing between You and: (1) Teva Pharmaceuticals, USA Inc.; (2) Cephalon Inc.; (3) Johnson & Johnson; (4) Janssen Pharmaceuticals, Inc.; (5) Depomed Inc.: (6) Endo Health Solutions Inc.; (7) Endo Pharmaceuticals Inc.; (8) Allergan PLC; (9) Actavis Inc.; (10) Watson Laboratories Inc.; (11) Actavis LLC; and (12) Actavis Pharma Inc.

70. All Documents related to Your decision, and Your monitoring, evaluation, and targeting of any program, to create trial cards, copay coupons, savings cards or similar offerings to be provided to HCPs by Sales Representatives or otherwise, to enable patients to obtain Opioids free of charge or at reduced cost, to the extent not already requested and produced.

71. A functioning copy of the systems and databases, including the call notes system, computerized systems, and customer relations management systems, used by Sales Representatives in the ordinary course of business as part of their responsibilities related to detailing Customers. Such copy shall consist solely of the software in its native form. This request is not intended to include any data entered into such systems and

databases. Alternatively, You may produce screenshots and documents sufficient to completely identify the functionality of such systems and databases and, if practicable, a demonstration of such systems and databases.

72. Documents sufficient to Identify the Purdue employees or agents most knowledgeable concerning the following topics:

a. Purdue's revenues and profits from its sale of Opioids;

b. Purdue's share of the Opioid market, including, without limitation, the information sought in Nos. 44-46, above.

c. All payments received by Purdue, directly or indirectly, from sales of its Opioids in the United States, including all sources of payments.

d. Purdue's corporate structure and ownership.

e. The financial condition of Purdue and its affiliated entities, including its assets and revenue.

f. The Documents identified in Attachment A.

g. Purdue's role in soliciting, funding, developing and distributing the Documents identified in Attachment A.

h. The scientific data, Scientific Research, or scientific substantiation to support any claim made by the Documents identified in Attachment A regarding the efficacy, safety, or risks, of Opioids, including that a particular claim is established by scientific data, research, or other substantiation, and the individuals who evaluated or authorized any such claim.

i. Purdue's relationship with Pain Advocacy Organizations, including, without limitation, the:

1. Academy of Integrative Pain Management.
2. American Academy of Pain Medicine.
3. American Chronic Pain Association.
4. American Geriatric Society.
5. American Pain Foundation.
6. American Pain Society.
7. American Society of Pain Educators.
8. Center for Responsible Bioethics.
9. College on Problems of Drug Dependence.
10. Federation of State Medical Boards.
11. Global Education Group.
12. National Pain Foundation.

13. Pain Care Forum.
14. Pain and Policy Studies Group.
15. US Pain Foundation.

j. Purdue's plans for Marketing and advertising its Opioids in the United States, including its business, strategic, Marketing, tactical or brand plans.

k. The return on investment or effectiveness of any aspect of Purdue's Marketing of its Opioids, including, but not limited to, Marketing by Sales Representatives, Marketing Materials, Medical Education, home office visits, advisory boards, and speaker programs.

l. Purdue's process for Identifying or selecting Customers for sales calls and any related prescribing behavior models Purdue uses or has used.

m. Purdue's management, training and compensation of it its Sales Representatives and related records and record-keeping.

n. Purdue's systems and databases, including the call notes system, computerized systems, and customer relations management systems, used by Sales Representatives in the ordinary course of business as part of their responsibilities related to detailing Customers, and procedures related to review and audit thereof.

o. Purdue's ADD program.

p. The process by which Purdue develops, reviews, and approves its branded and unbranded Marketing Materials for its Opioids.

q. The process by which Purdue develops, reviews, approves and/or decides to fund Medical Education regarding chronic pain and Opioids.

r. Purdue's process for soliciting, reviewing and approving or denying applications for funding submitted by Pain Advocacy Organizations.

s. The content, control, creation, testing, and approval or disapproval of Marketing Materials and Medical Education.

t. The process by which Purdue seeks and obtains FDA approval for its Opioids.

u. The process by which Purdue develops, reviews, and approves claims regarding the efficacy and safety of its Opioids.

v. The computer systems, databases, software and programs that Purdue uses in connection with the Marketing and sale of its Opioids, including all third-party contractors or vendors responsible for establishing and maintaining Purdue's information technology operations and services.

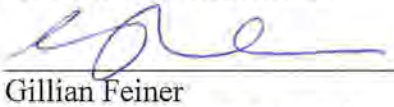
w. Purdue's systems, policies and procedures for creating, maintaining, retaining and backing up Documents and information, including any shared repositories or Internet-based repositories or collaboration tools.

x. The process by which Purdue collected, reviewed and produced Documents responsive to subpoenas and civil investigative demands issued by the States.

y. Purdue's systems, policies and procedures for creating, maintaining, retaining and backing up Documents and information, including any shared repositories or Internet-based repositories or collaboration tools, in the normal course of business, including but not limited to the custodial files of the individuals identified or referenced in Requests 65 and 67.

COMMONWEALTH OF MASSACHUSETTS

MAURA HEALEY
ATTORNEY GENERAL



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gillian.feiner@state.ma.us

ATTACHMENT A		
	Title	Reference[1]
1	*A Policymaker's Guide to Understanding Pain & Its Management*, American Pain Foundation	PWG000244095
2	*Addiction Rare in Patients Treated with Narcotics*, J. Porter & H. Jick, New England Journal of Medicine	
3	*Butrans Formulary Submission Dossier*	PWG0000224325
4	*Chronic Pain Management and Opioid Use: Easing Fears, Managing Risks, and Improving Outcomes*	PWG003729182
5	*Clinical Guidelines for the Use of Chronic Opioid Therapy in Chronic Noncancer Pain*, printed in Journal of Pain, American Pain Society-American Academy of Pain Medicine	PWG000225441
6	Clinical Issues in Opioid Prescribing	PAP126
7	Complexities of Caring for People in Pain	OME274
8	*Consensus Paper: Definitions Related to the Use of Opioids for the Treatment of Pain*	OME010
9	*Exit Wounds*, American Pain Foundation	PTN000023058
10	*FACETS: Focused and Customized Education Topic Selections in Pain Management*, Volumes 1-4	OME262, OME272, OME279, OME284
11	*Getting the Help You Need*, American Pain Foundation	
12	*Managing Patient's Opioid Use: Balancing the Need and the Risk*, Medicom	PWG000139978

[1] Item numbers and bates numbers are for reference purposes only. They should not be construed as identifying the only version, edition or volume being sought.

13	*Medications for Persistent Pain, A Guide to Safe Use of Pain Medications for Older Adults*, Health in Aging Foundation	PWG000225608
14	*Model Guidelines for the Use of Controlled Substances for the Treatment of Pain*, Federation of State Medical Boards	OPO106
15	*Opioid Prescribing: Clinical Tools and Risk Management Strategies*, by Alfred V. Anderson, MD, DC, Perry G. Fine, MD, and Scott M. Fishman, MD	PWG000242087
16	*Pain Action Guide*, American Pain Foundation	PWG000058295
17	Pain Management: The Online Series, including Module Two: Overview of Management Options, American Medical Association	PWG000172197
18	*PAIN: A Guide for Physician Assistants and Patients*, Physician Assistant Foundation	PWG000224272
19	*Pain Management Kit*, Partners Against Pain	PSC000007090
21	*Path of the Patient, Managing Chronic Pain in Younger Adults at Risk for Abuse*	
22	*Providing Relief, Preventing Abuse*	PPXX40
23	*Responsible Opioid Prescribing: A Clinician's Guide, 2nd ed*., revised & expanded, by Scott M. Fishman, M.D., Federation of State Medical Boards	PWG000156956
24	*Responsible Opioid Prescribing: A Physician's Guide*, Federation of State Medical Boards	
25	*Safe Opioids Prescribing Initiative*, American Academy of Pain Medicine	
26	*Take My Pain Away: A Physician's Perspective of Prescription Opioids and Pain Management*, by Gerald Aronoff, MD, Medical Director,	PWG000214676

	Carolina Pain Associates, printed in The Atlantic	
27	*The Management of Persistent Pain in Older Persons*, American Geriatric Society Guidelines	PWG000223475
28	*The Numbers Are In.…*	PWG000053335
29	*The Use of Opioids for the Treatment of Chronic Pain, Journal of Pain*, American Academy of Pain Medicine and the American Pain Society	
30	*Treating Pain, Combating Abuse*: *Treating Chronic Pain in a Nation with Persistent Drug Abuse*, J. David Haddox, DDS, MD, Vice President, Health Policy, Purdue Pharma L.P., printed in The Atlantic	PWG000133577
31	*Treatment Options: A Guide for People Living with Pain*, American Pain Foundation	PTN000030001

Exhibit 4

COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

CIVIL INVESTIGATIVE DEMAND
FOR DOCUMENTS AND TESTIMONY

CID-2017-HCD-10
Issued October 27, 2017

TO: [redacted]

YOU ARE HEREBY REQUIRED to (a) to produce and deliver documentary materials and (b) to appear and offer oral testimony under oath as described in this Civil Investigative Demand ("CID") to the Attorney General of the Commonwealth of Massachusetts in accordance with the Definitions and Instructions in this CID. The Attorney General has issued this CID pursuant to Massachusetts General Laws, Chapter 93A, Section 6, which authorizes the Attorney General to investigate possible unfair or deceptive methods, acts, or practices in violation of Chapter 93A, Section 2(a). This investigation relates to allegations of unfair or deceptive acts or practices in the marketing and sale of opioids by Purdue Pharma L.P. in Massachusetts in violation of Massachusetts General Laws Chapter 93A, Section 2(a), and other Massachusetts laws and regulations. This CID requires that You produce documents and offer oral testimony under oath pursuant to G.L. c. 93A, § 6(1).

The Attorney General has issued this CID as part of the Office of the Attorney General's oversight of the Massachusetts health care system as a "health oversight agency," as that term is defined and used in 45 C.F.R. §§ 164.501 and 164.512(d) of the federal Standards for Privacy of Individually Identifiable Health Information that implements the privacy requirements of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Providing the requested information is also a permitted disclosure under HIPAA because it is "required by law" pursuant to 45 C.F.R. § 164.512(a) and made "for law enforcement purposes," pursuant to 45 C.F.R. § 164.512(f), including that it complies with the HIPAA standard for disclosures to law enforcement officials set forth in 45 C.F.R. § 164.512(f)(1)(ii)(C), namely, that the information sought is relevant and material to a legitimate law enforcement inquiry, the request is specific and limited in scope to the extent reasonably practicable, and de-identified information cannot reasonably be used to complete the investigation.

DOCUMENTARY MATERIALS: You are hereby required to produce and deliver, for examination and copying, the requested documentary material in your possession, custody, or control on or before November 13, 2017 by delivering them to Stephen B. Vogel, Assistant Attorney General, Health Care Division, Office of the Attorney General, One Ashburton Place, Boston, Massachusetts 02108. The materials provided to the Attorney General should be accompanied by an affidavit signed by You. The affidavit should state that the production is full and complete, and, to the extent that any documents are withheld from production under a claim of privilege, the affidavit should specify the nature of each document and the applicable legal privilege. The produced materials will be reviewed by Assistant Attorney General Vogel and

such other employees, agents, and experts of the Office of the Attorney General as needed as part of this investigation.

ORAL TESTIMONY: You are hereby required to appear and offer testimony under oath at an examination that shall be conducted by one or more Assistant Attorneys General at the Office of the Attorney General, 100 Cambridge Street, 10th Floor, Boston, Massachusetts starting at 10:00 AM on November 20, 2017, or at another mutually agreeable time and/or location concerning the subject matter of this investigation, including, but not limited to, (a) the documentary materials demanded by this CID, (b) those documentary materials produced by You in response to that CID, and (c) Your methods, acts, practices, training and results in the marketing and sale of opioids by Purdue Pharma L.P.

INSTRUCTIONS

1. The documents submitted in response to this CID shall include all relevant documents in Your possession, custody, or control, including but not limited to documents maintained or stored at Your offices, or at any other location(s) where You do business or maintain or store documents.

2. In each instance in which a document is produced in response to a request, the current edition should be produced together with all earlier editions, drafts, or predecessor documents during the relevant time period, even though the title of the earlier documents may differ from current versions.

3. To the extent that documents are found in file folders and other similar containers that have labels or other identifying information, the documents shall be produced with such file folder and label information intact.

4. The documents submitted in response to this CID shall be marked or organized in such a way as to identify the document request (by number) to which each document is responsive.

5. Unless otherwise specified and agreed by the Office of the Attorney General, responsive documents maintained as electronic documents in the regular course of business must be produced as electronic documents. Documents maintained in hard copy may be produced in either electronic or hard copy format. To the extent hard copy and electronic documents are produced in electronic format, the Attorney General requests that all such documents be produced in electronic format suitable for loading into ONE Platform by Driven, Inc., including a text file and a load file containing all metadata. All Excel spreadsheets should be produced in native file format. See the attached AGO Data Delivery Specification for further technical specifications applicable to production of documents in electronic format.

6. If You withhold any requested document under any claim of privilege, please provide a list identifying each document for which You are claiming privilege, the author(s) and recipient(s) of the document, the date of the document, the nature of the document, the subject matter of the document, and the nature and basis of the privilege.

7. If any document requested in this CID is no longer in Your possession or custody or subject to Your control, please identify the document by its author(s), recipients(s), date and subject matter, and state whether the document is lost, has been destroyed, or has been transferred to others (and, if the latter, identify the transferee(s)).

8. Please mark each page with an identifying "Bates" mark and number each page sequentially. The marks should not obscure any information on the document.

9. Unless otherwise specified, this CID applies to documents in effect, created, recorded, compiled, transmitted, and/or received at any time from 2007 to the present. This document request is continuing in nature so as to require supplementing documents if You obtain further responsive documents.

10. If You believe that the production of documents as required by this Civil Investigative Demand would be unduly burdensome, or if You require clarification of any request, please contact Assistance Attorney General Vogel within ten (10) days of receipt hereof.

DEFINITIONS

1. "Communication" means the transmittal of information (in the form of facts, opinions, ideas, inquiries, or otherwise).

2. "Concerning" means referring to, describing, offering evidence of, or constituting.

3. "Document(s)" is defined to be synonymous in meaning and equal in scope to the usage of this term in Mass. R. Civ. P. 34 (a). An earlier draft is a separate document within the meaning of this term.

4. "Purdue" means Purdue Pharma L.P. and all of its predecessors, successors, parent corporations, affiliates, subdivisions, subsidiaries, officers, directors, agents, servants, and/or employees.

5. "You" means [redacted] and any of his attorneys or agents.

6. To the extent necessary to bring into the scope of the document requests any document that might otherwise be construed to be outside their scope (a) the word "or" means "and/or," (b) the word "and" means "and/or," (c) the word "all" means "any and all," (d) the word "any" means "any and all," (e) the word "each" means "each and every," (f) the word "every" means "each and every," and (g) the singular form of a word includes the plural form, and the plural includes the singular.

REQUESTS TO PRODUCE DOCUMENTS

Please produce the following:

1. All documents relating, directly or indirectly, to the marketing, or promotion, of Purdue-branded opioids in Massachusetts, including, but not limited to, marketing materials, emails, customer target lists, clinical reprints, travel and entertainment budget and expense

reports, budgets for and/or spending on marketing or educational events, sales training and compliance documents, documents relating to the allocation and distribution of samples, and documents relating to or constituting correspondence or other communication to or from any person regarding such marketing or solicitation, however maintained.

2. All documents relating, directly or indirectly, to any training received, performed or attended by you concerning, specifically or generally, the marketing, or promotion, of any Purdue-branded opioid.

3. All documents relating, directly or indirectly, to your relationship with Purdue, including, but not limited to, any communications from Purdue relating to the marketing or promoting of Purdue-branded opioids, contracts or agreements with Purdue, documents relating to compensation, performance, evaluations, employee manuals or sales manuals, ride-along reports, commendations, awards, complaints, and records of disciplinary action.

Dated: Boston, Massachusetts
October 27, 2017

COMMONWEALTH OF MASSACHUSETTS

MAURA HEALEY
ATTORNEY GENERAL

Stephen B. Vogel
Assistant Attorney General
Health Care Division
Office of the Attorney General
One Ashburton Place
Boston, MA 02108
617-963-2415
stephen.vogel@state.ma.us

Exhibit 5

COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

CIVIL INVESTIGATIVE DEMAND FOR DOCUMENTS AND TESTIMONY

CID-2017-HCD-10
Issued October 30, 2017

TO: [redacted]

YOU ARE HEREBY REQUIRED to (a) to produce and deliver documentary materials and (b) to appear and offer oral testimony under oath as described in this Civil Investigative Demand ("CID") to the Attorney General of the Commonwealth of Massachusetts in accordance with the Definitions and Instructions in this CID. The Attorney General has issued this CID pursuant to Massachusetts General Laws, Chapter 93A, Section 6, which authorizes the Attorney General to investigate possible unfair or deceptive methods, acts, or practices in violation of Chapter 93A, Section 2(a). This investigation relates to allegations of unfair or deceptive acts or practices in the marketing and sale of opioids by Purdue Pharma L.P. in Massachusetts in violation of Massachusetts General Laws Chapter 93A, Section 2(a), and other Massachusetts laws and regulations. This CID requires that You produce documents and offer oral testimony under oath pursuant to G.L. c. 93A, § 6(1).

The Attorney General has issued this CID as part of the Office of the Attorney General's oversight of the Massachusetts health care system as a "health oversight agency," as that term is defined and used in 45 C.F.R. §§ 164.501 and 164.512(d) of the federal Standards for Privacy of Individually Identifiable Health Information that implements the privacy requirements of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Providing the requested information is also a permitted disclosure under HIPAA because it is "required by law" pursuant to 45 C.F.R. § 164.512(a) and made "for law enforcement purposes," pursuant to 45 C.F.R. § 164.512(f), including that it complies with the HIPAA standard for disclosures to law enforcement officials set forth in 45 C.F.R. § 164.512(f)(1)(ii)(C), namely, that the information sought is relevant and material to a legitimate law enforcement inquiry, the request is specific and limited in scope to the extent reasonably practicable, and de-identified information cannot reasonably be used to complete the investigation.

DOCUMENTARY MATERIALS: You are hereby required to produce and deliver, for examination and copying, the requested documentary material in your possession, custody, or control on or before December 1, 2017 by delivering them to Michael W. Wong, Assistant Attorney General, Office of the Attorney General, Health Care Division, One Ashburton Place, Boston, Massachusetts 02108. The materials provided to the Attorney General should be accompanied by an affidavit signed by You. The affidavit should state that the production is full and complete, and, to the extent that any documents are withheld from production under a claim of privilege, the affidavit should specify the nature of each document and the applicable legal

privilege. The produced materials will be reviewed by Assistant Attorney Michael W. Wong and such other employees, agents, and experts of the Office of the Attorney General as needed as part of this investigation.

ORAL TESTIMONY: You are hereby required to appear and offer testimony under oath at an examination that shall be conducted by one or more Assistant Attorneys General at the Office of the Attorney General, 100 Cambridge Street, 10th Floor, Boston, Massachusetts starting at 9:30 AM on December 8, 2017, or at another mutually agreeable time and/or location concerning the subject matter of this investigation, including, but not limited to, (a) the documentary materials demanded by this CID, (b) those documentary materials produced by You in response to that CID and (c) Your methods, acts, practices, training and results in the marketing and sale of opioids by Purdue Pharma L.P.

INSTRUCTIONS

1. The documents submitted in response to this CID shall include all relevant documents in Your possession, custody, or control, including but not limited to documents maintained or stored at Your offices, or at any other location(s) where You do business or maintain or store documents.

2. In each instance in which a document is produced in response to a request, the current edition should be produced together with all earlier editions, drafts, or predecessor documents during the relevant time period, even though the title of the earlier documents may differ from current versions.

3. To the extent that documents are found in file folders and other similar containers that have labels or other identifying information, the documents shall be produced with such file folder and label information intact.

4. The documents submitted in response to this CID shall be marked or organized in such a way as to identify the document request (by number) to which each document is responsive.

5. Unless otherwise specified and agreed by the Office of the Attorney General, responsive documents maintained as electronic documents in the regular course of business must be produced as electronic documents. Documents maintained in hard copy may be produced in either electronic or hard copy format. To the extent hard copy and electronic documents are produced in electronic format, the Attorney General requests that all such documents be produced in electronic format suitable for loading into ONE Platform by Driven, Inc., including a text file and a load file containing all metadata. All Excel spreadsheets should be produced in native file format. See the attached AGO Data Delivery Specification for further technical specifications applicable to production of documents in electronic format.

6. If You withhold any requested document under any claim of privilege, please provide a list identifying each document for which You are claiming privilege, the author(s) and

recipient(s) of the document, the date of the document, the nature of the document, the subject matter of the document, and the nature and basis of the privilege.

7. If any document requested in this CID is no longer in Your possession or custody or subject to Your control, please identify the document by its author(s), recipients(s), date and subject matter, and state whether the document is lost, has been destroyed, or has been transferred to others (and, if the latter, identify the transferee(s)).

8. Please mark each page with an identifying "Bates" mark and number each page sequentially. The marks should not obscure any information on the document.

9. Unless otherwise specified, this CID applies to documents in effect, created, recorded, compiled, transmitted, and/or received at any time from 2007 to the present. This document request is continuing in nature so as to require supplementing documents if You obtain further responsive documents.

10. If You believe that the production of documents as required by this Civil Investigative Demand would be unduly burdensome, or if You require clarification of any request, please contact Assistance Attorney General Michael W. Wong within ten (10) days of receipt hereof.

DEFINITIONS

1. "Communication" means the transmittal of information (in the form of facts, opinions, ideas, inquiries, or otherwise).

2. "Concerning" means referring to, describing, offering evidence of, or constituting.

3. "Document(s)" is defined to be synonymous in meaning and equal in scope to the usage of this term in Mass. R. Civ. P. 34 (a). An earlier draft is a separate document within the meaning of this term.

4. "Purdue" means Purdue Pharma L.P. and all of its predecessors, successors, parent corporations, affiliates, subdivisions, subsidiaries, officers, directors, agents, servants and/or employees.

5. "You" means [redacted] and any of her attorneys or agents.

6. To the extent necessary to bring into the scope of the document requests any document that might otherwise be construed to be outside their scope (a) the word "or" means "and/or," (b) the word "and" means "and/or," (c) the word "all" means "any and all," (d) the word "any" means "any and all," (e) the word "each" means "each and every," (f) the word "every" means "each and every" and (g) the singular form of a word includes the plural form, and the plural includes the singular.

REQUESTS TO PRODUCE DOCUMENTS

Please produce the following:

1. All documents relating, directly or indirectly to the marketing, or promotion, of Purdue-branded opioids in Massachusetts, including, but not limited to, marketing materials, emails, customer target lists, clinical reprints, travel and entertainment budget and expense reports, budgets for and/or spending on marketing or educational events, sales training and compliance documents, documents relating to the allocation and distribution of samples and documents relating to or constituting correspondence or other communication to or from any person regarding such marketing or solicitation, however maintained.

2. All documents relating, directly or indirectly to any training received, performed or attended by you concerning, specifically or generally, the marketing, or promotion, of any Purdue-branded opioid.

3. All documents relating, directly or indirectly to your relationship with Purdue, including, but not limited to, any communications from Purdue relating to the marketing or promoting of Purdue-branded opioids, contracts or agreements with Purdue, documents relating to compensation, performance, evaluations, employee manuals or sales manuals, ride-along reports, commendations, awards, complaints, and records of disciplinary action.

Dated: Boston, Massachusetts
October 30, 2017

COMMONWEALTH OF MASSACHUSETTS

MAURA HEALEY
ATTORNEY GENERAL

Michael Wong

Michael W. Wong
Assistant Attorney General
Health Care Division
Health Care and Fair Competition Bureau
One Ashburton Place
Boston, MA 02108
617-727-2200, ext. 2918

Exhibit 6

COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

CIVIL INVESTIGATIVE DEMAND FOR DOCUMENTS AND TESTIMONY

CID-2017-FCD-50
Issued November 10, 2017

TO: [redacted]

YOU ARE HEREBY REQUIRED to (a) to produce and deliver documentary materials and (b) to appear and offer oral testimony under oath as described in this Civil Investigative Demand ("CID") to the Attorney General of the Commonwealth of Massachusetts in accordance with the Definitions and Instructions in this CID. The Attorney General has issued this CID pursuant to Massachusetts General Laws, Chapter 93A, Section 6, which authorizes the Attorney General to investigate possible unfair or deceptive methods, acts, or practices in violation of Chapter 93A, Section 2(a). This investigation relates to allegations of unfair or deceptive acts or practices in the marketing and sale of opioids by Purdue Pharma L.P. in Massachusetts in violation of Massachusetts General Laws Chapter 93A, Section 2(a), and other Massachusetts laws and regulations. This CID requires that You produce documents and offer oral testimony under oath pursuant to G.L. c. 93A, § 6(1).

The Attorney General has issued this CID as part of the Office of the Attorney General's oversight of the Massachusetts health care system as a "health oversight agency," as that term is defined and used in 45 C.F.R. §§ 164.501 and 164.512(d) of the federal Standards for Privacy of Individually Identifiable Health Information that implements the privacy requirements of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Providing the requested information is also a permitted disclosure under HIPAA because it is "required by law" pursuant to 45 C.F.R. § 164.512(a) and made "for law enforcement purposes," pursuant to 45 C.F.R. § 164.512(f), including that it complies with the HIPAA standard for disclosures to law enforcement officials set forth in 45 C.F.R. § 164.512(f)(1)(ii)(C), namely, that the information sought is relevant and material to a legitimate law enforcement inquiry, the request is specific and limited in scope to the extent reasonably practicable, and de-identified information cannot reasonably be used to complete the investigation.

DOCUMENTARY MATERIALS: You are hereby required to produce and deliver, for examination and copying, the requested documentary material in your possession, custody, or control on or before December 14, 2017 by delivering them to Jenny Wojewoda, Assistant Attorney General, Office of the Attorney General, One Ashburton Place, Boston, Massachusetts 02108. The materials provided to the Attorney General should be accompanied by an affidavit signed by You. The affidavit should state that the production is full and complete, and, to the extent that any documents are withheld from production under a claim of privilege, the affidavit should specify the nature of each document and the applicable legal privilege. The produced materials will be reviewed by Assistant Attorney General Jenny Wojewoda and such other employees, agents, and experts of the Office of the Attorney General as needed as part of this investigation.

ORAL TESTIMONY: You are hereby required to appear and offer testimony under oath at an examination that shall be conducted by one or more Assistant Attorneys General at the Office of the Attorney General, 100 Cambridge Street, 10th Floor, Boston, Massachusetts starting at 10 AM on December 21, 2017, or at another mutually agreeable time and/or location concerning the subject matter of this investigation, including, but not limited to, (a) the documentary materials demanded by this CID, (b) those documentary materials produced by You in response to that CID and (c) Your methods, acts, practices, training and results in the marketing and sale of opioids by Purdue Pharma L.P.

INSTRUCTIONS

1. The documents submitted in response to this CID shall include all relevant documents in Your possession, custody, or control, including but not limited to documents maintained or stored at Your offices, or at any other location(s) where You do business or maintain or store documents.

2. In each instance in which a document is produced in response to a request, the current edition should be produced together with all earlier editions, drafts, or predecessor documents during the relevant time period, even though the title of the earlier documents may differ from current versions.

3. To the extent that documents are found in file folders and other similar containers that have labels or other identifying information, the documents shall be produced with such file folder and label information intact.

4. The documents submitted in response to this CID shall be marked or organized in such a way as to identify the document request (by number) to which each document is responsive.

5. Unless otherwise specified and agreed by the Office of the Attorney General, responsive documents maintained as electronic documents in the regular course of business must be produced as electronic documents. Documents maintained in hard copy may be produced in either electronic or hard copy format. To the extent hard copy and electronic documents are produced in electronic format, the Attorney General requests that all such documents be produced in electronic format suitable for loading into ONE Platform by Driven, Inc., including a text file and a load file containing all metadata. All Excel spreadsheets should be produced in native file format.

6. If You withhold any requested document under any claim of privilege, please provide a list identifying each document for which You are claiming privilege, the author(s) and recipient(s) of the document, the date of the document, the nature of the document, the subject matter of the document, and the nature and basis of the privilege.

7. If any document requested in this CID is no longer in Your possession or custody or subject to Your control, please identify the document by its author(s), recipients(s), date and subject matter, and state whether the document is lost, has been destroyed, or has been

transferred to others (and, if the latter, identify the transferee(s)).

8. Please mark each page with an identifying "Bates" mark and number each page sequentially. The marks should not obscure any information on the document.

9. Unless otherwise specified, this CID applies to documents in effect, created, recorded, compiled, transmitted, and/or received at any time from October 16, 2013 to the present. This document request is continuing in nature so as to require supplementing documents if You obtain further responsive documents.

10. If You believe that the production of documents as required by this Civil Investigative Demand would be unduly burdensome, or if You require clarification of any request, please contact Assistance Attorney General Jenny Wojewoda within ten (10) days of receipt hereof.

DEFINITIONS

1. "Communication" means the transmittal of information (in the form of facts, opinions, ideas, inquiries, or otherwise).

2. "Concerning" means referring to, describing, offering evidence of, or constituting.

3. "Document(s)" is defined to be synonymous in meaning and equal in scope to the usage of this term in Mass. R. Civ. P. 34 (a). An earlier draft is a separate document within the meaning of this term.

4. "Purdue" means Purdue Pharma L.P. and all of its predecessors, successors, parent corporations, affiliates, subdivisions, subsidiaries, officers, directors, agents, servants and/or employees.

5. "You" means [redacted] and any of [redacted] attorneys or agents.

6. To the extent necessary to bring into the scope of the document requests any document that might otherwise be construed to be outside their scope (a) the word "or" means "and/or," (b) the word "and" means "and/or," (c) the word "all" means "any and all," (d) the word "any" means "any and all," (e) the word "each" means "each and every," (f) the word "every" means "each and every" and (g) the singular form of a word includes the plural form, and the plural includes the singular.

REQUESTS TO PRODUCE DOCUMENTS

Please produce the following:

1. All documents relating, directly or indirectly to the marketing, or promotion, of Purdue-branded opioids in Massachusetts, including, but not limited to, marketing materials, emails, customer target lists, clinical reprints, travel and entertainment budget and expense reports, budgets for and/or spending on marketing or educational events, sales training and compliance documents, documents relating to the allocation and distribution of samples and

documents relating to or constituting correspondence or other communication to or from any person regarding such marketing or solicitation, however maintained.

2. All documents relating, directly or indirectly to any training received, performed or attended by you concerning, specifically or generally, the marketing, or promotion, of any Purdue-branded opioid.

3. All documents relating, directly or indirectly to your relationship with Purdue, including, but not limited to, any communications from Purdue relating to the marketing or promoting of Purdue-branded opioids, contracts or agreements with Purdue, documents relating to compensation, performance, evaluations, employee manuals or sales manuals, ride-along reports, commendations, awards, complaints, and records of disciplinary action.

Dated: Boston, Massachusetts
November 10, 2017

COMMONWEALTH OF MASSACHUSETTS

MAURA HEALEY
ATTORNEY GENERAL

Jenny Wojewoda
Assistant Attorney General
Health Care and Fair Competition Bureau
One Ashburton Place
Boston, MA 02108
617-727-2200, ext. 2547

Exhibit 7

MAURA HEALEY
ATTORNEY GENERAL

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL
ONE ASHBURTON PLACE
BOSTON, MASSACHUSETTS 02108

(617) 727-2200
(617) 727-4765 TTY
www.mass.gov/ago

CID-2017-FCD-51
Issued November 13, 2017

Via Electronic Mail

TO: [redacted]

YOU ARE HEREBY REQUIRED to (a) to produce and deliver documentary materials and (b) to appear and offer oral testimony under oath as described in this Civil Investigative Demand ("CID") to the Attorney General of the Commonwealth of Massachusetts in accordance with the Definitions and Instructions in this CID. The Attorney General has issued this CID pursuant to Massachusetts General Laws, Chapter 93A, Section 6, which authorizes the Attorney General to investigate possible unfair or deceptive methods, acts, or practices in violation of Chapter 93A, Section 2(a). This investigation relates to allegations of unfair or deceptive acts or practices in the marketing and sale of opioids in Massachusetts in violation of Massachusetts General Laws Chapter 93A, Section 2(a), and other Massachusetts laws and regulations. This CID requires that You produce documents and offer oral testimony under oath pursuant to G.L. c. 93A, § 6(1).

DOCUMENTARY MATERIALS: You are hereby required to produce and deliver, for examination and copying, the requested documentary material in your possession, custody, or control on or before December 1, 2017 by delivering them to Gillian Feiner, Assistant Attorney General, False Claims Division, Office of the Attorney General, One Ashburton Place, Boston, Massachusetts 02108. The materials provided to the Attorney General should be accompanied by an affidavit signed by You. The affidavit should state that the production is full and complete, and, to the extent that any documents are withheld from production under a claim of privilege, the affidavit should specify the nature of each document and the applicable legal privilege. The produced materials will be reviewed by Assistant Attorney General Feiner and such other employees, agents, and experts of the Office of the Attorney General as needed as part of this investigation.

ORAL TESTIMONY: You are hereby required to appear and offer testimony under oath at an examination that shall be conducted by one or more Assistant Attorneys General at the

Office of the Attorney General, 100 Cambridge Street, 10th Floor, Boston, Massachusetts starting at 10:00 AM on December 15, 2017, or at another mutually agreeable time and/or location concerning the subject matter of this investigation, including, but not limited to, (a) the documentary materials demanded by this CID, (b) those documentary materials produced by You in response to that CID, and (c) Your methods, acts, practices, training and results in the marketing, sale and treatment of patients with opioids.

At any time prior to the date specified in the notice, or within twenty-one days after the notice has been served, whichever period is shorter, the court may, upon motion for good cause shown, extend such reporting date or modify or set aside such demand or grant a protective order in accordance with the standards set forth in Rule 26(c) of the Massachusetts Rules of Civil Procedure.

COMMONWEALTH OF MASSACHUSETTS

MAURA HEALEY
ATTORNEY GENERAL

By: Gillian Feiner Digitally signed by Gillian Feiner DN: cn Gillian Feiner o Office of the Massachusetts Attorney General ou False Claims Division email gillian.feiner@state.ma.us c US Date: 2017.11.13 11:34:47 05'00'

Gillian Feiner
Chief, False Claims Division
Office of the Attorney General
One Ashburton Place
Boston, MA 02108
Tel: 617-963-2571 (direct dial)
gillian.feiner@state.ma.us

I. INSTRUCTIONS FOR DOCUMENT REQUESTS

1. **Organization of Responses:** The documents produced shall be identified and segregated to correspond with the number of the request. All documents produced must be marked with consecutive document control numbers, *i.e.* Bates stamped. If a document is responsive to more than one request, identical copies of the document need not be produced. However, any copy of a document that differs in any manner, including but not limited to versions, dates, or the presence of handwritten notations, shall be produced. All marginalia, post-its, and electronic and paper attachments to responsive documents shall be produced attached to the responsive documents.

2. **Duty to Preserve Documents:** All documents and/or other data which relate to the subject matter or requests of this subpoena must be preserved. Any destruction involving such documents must cease, even if it is your normal or routine course of business to delete or destroy such documents or data and even if you believe such documents or data are privileged or otherwise need not be produced.

3. **Documents No Longer in Possession of Respondent/Destroyed Documents:** If any responsive document was, but no longer is, in your possession, custody or control, produce a description of each such document. The description shall include the following:

    a. a detailed description of the content of the document;
    b. the name of each author, sender, creator, and initiator of such document;
    c. the name of each recipient, addressee, or party for whom such document was intended;
    d. the date the document was created;
    e. the date(s) the document was in use;
    f. the reason it is no longer in your possession, custody or control; and
    g. the document's current location.

    If the document is no longer in existence, in addition to providing the information indicated above, state on whose instructions the document was destroyed or otherwise disposed of, and the date and manner of the disposal.

4. **Production:** see Appendix I: Special Instructions for Electronically Produced or Stored Material, attached.

5. **Privileged Documents/Privilege Log:** If any responsive document is withheld under any claim of privilege, provide a detailed privilege log that contains at least the following information for each document that you have withheld:

    a. the general subject matter of the document;
    b. the claimed grounds for withholding the document, including but not limited to the nature of any claimed privilege and grounds in support thereof.
    c. the name of each author, writer, sender, creator, or initiator of such document;

d. the name of each recipient, addressee, or party for whom such document was intended; and
e. the date of such document, or an estimate thereof if no date appears on the document.

6. **Duty to Supplement:** All document requests are continuing in nature so as to require supplemental production if you obtain further responsive documents or information. You are also are required to amend your responses to the requests contained within this subpoena if you discover that the previous response was incorrect or incomplete.

7. **Relevant Time Period:** Unless otherwise noted, the relevant time period for which documents are requested is from January 1, 2004, to the present. In each instance in which a document is produced in response to a request, the current edition should be produced together with all earlier editions, or predecessor documents during the relevant time period, even though the title of earlier documents may differ from current versions.

8. **Inclusive Interpretation:** If use of the words "and," "or," or "and/or" create any doubt about the inclusiveness of a specific subpoena paragraph or request, adopt the meaning resulting in the provision of more—rather than less—information. If the use of the words "any" or "all" create doubt about the inclusiveness of a specific subpoena paragraph or request, adopt the meaning resulting in the provision of more—rather than less—information, including the collective as well as the singular.

II. DEFINITIONS

For the purpose of this subpoena, the following words or terms have the following definitions:

1. "Communications" shall mean any conversation, discussion, letter, email, memorandum, meeting, note or other transmittal of information or message, whether transmitted in writing, orally, electronically or by any other means, and shall include any document that abstracts, digests, transcribes, records or reflects any of the foregoing.

2. "Document(s)" shall mean the original (or duplicate, identical copies when originals are not available), and any non-identical copies (whether different from the original because of notes made on such copies or otherwise) of all written or graphic matter, recordings, or ESI, whether in final or draft form, however produced, or reproduced, of every kind and description in your actual or constructive possession, custody, care or control, including notes, letters, memoranda, ledgers, worksheets, records, books of account, accounting records, brochures, circulars, advertisements, proofs, sheets, books, magazines, reprints, summaries, reports, studies, projections, notebooks, diaries, calendars, appointment books, registers, graphs, charts, sketches, photographs, images, drawings, plans, tables, calculations, specifications, analyses, inter-corporate communications, papers, writings, agreements, contracts, purchase orders, acknowledgments, receipts, shipping papers, checks, invoices, authorizations, budgets, schedules, transcripts, correspondence, drafts, telegrams, cables, telexes, e-mails,

website content, memoranda of telephone conversations, sound recordings, minutes of meetings, drafts of any of the foregoing which are non-identical because of marginal notations or otherwise, other documents as appropriate in context, and other data or data compilations, stored in any medium from which information can be obtained either directly or, if necessary, after translation by the responding party into a reasonably usable form. Any internal audit, review, examination, critique or report of any of Respondent's practices and procedures is included within this term. "Document" also includes the file, folder tabs, or containers and labels associated with each original or copy.

3. "Employee" shall mean and include, but is not limited to, all current or former salaried employees, hourly employees, independent contractors, and individuals performing work as temporary employees.

4. "Identify" (and variations such as "identity" or identification") shall mean the following:

    a. With respect to a natural person, the complete name, any assumed name or alias, date of birth, occupation, title(s), job responsibilities, street and mailing address for both home and business at the time in question and at the time of responding (if different), home, cellular, and business telephone numbers, and personal and business email addresses;

    b. With respect to a non-natural person, its name, business address, legal address, state(s) of incorporation, registered or unregistered trade name(s), name(s) under which it does business, electronic email domains and websites operated by the entity, tax identification number, and the identity of its agent(s) for the service of process; and

    c. With respect to a document, its identification number, its title, its date, its location, its signatory, its description (e.g., memorandum, letter, contract, form), and the number of pages

5. "Opioid Manufacturer" means any manufacturer, or holder of a New Drug Application of Abbreviated New Drug Application for any Opioid.

6. "Opioid" shall mean all naturally occurring, synthetic, or semisynthetic substances that bind to opioid receptors and act like opium, including but not limited to, hydrocodone, hydromorphone, oxycodone, oxymorphone, fentanyl, methadone, buprenorphine, meperidine, morphine, opium, and codeine.

7. "Pain-Related Materials" shall refer to presentations and publications in any form sponsored and/or funded in whole or in part by any Opioid Manufacturer or Pain-Related Organization and related to pain treatment, including, but not limited to: continuing medical education or training materials, books, articles, research, guides or scales for use by Opioid prescribers or patients using Opioids, web content, blog posts,

pamphlets, CD-ROMs, or slideshows. Pain-Related Materials shall include, without limitation:

a. American Academy of Pain Medicine and American Pain Society's 1997 Consensus Statement, *The Use of Opioids for the Treatment of Chronic Pain*

b. American Academy of Pain Medicine and American Pain Society's 2009 Guidelines, *Clinical Guidelines for the Use of Chronic Opioid Therapy in Chronic Noncancer Pain*

c. Academy of Integrative Pain Management's (f/k/a American Academy of Pain Management) *Opioid Prescribing: Clinical Tools and Risk Management Strategies*

d. American Medical Association's *Module 2 Pain Management: Overview of Treatment Options*

e. American Pain Foundation's *Treatment Options: A Guide for People Living with Pain*

f. American Pain Foundation's *Exit Wounds*

g. Federation of State Medical Boards' *Responsible Opioid Prescribing*

8. "Pain-Related Organization" shall refer to any group or entity involved in advocacy, educational, or lobbying activities concerning the issue of pain treatment or opioid prescribing during the relevant time period, including, but not limited to the American Pain Foundation, the American Pain Society, the American Academy of Pain Medicine, and the Academy of Integrative Pain Management, and the Pain Care Forum.

9. "Person" shall mean any natural person or such person's legal representative; any partnership, domestic or foreign corporation, or limited liability company; any company, trust, business entity, or association; and any agent, employee, salesman, partner, officer, director, member, stockholder, associate, or trustee.

10. "Prescribers" shall mean doctors, dentists, physicians' assistants, nurse practitioners, therapists, hospitals, clinics, pharmacists, and other medical personnel who write prescriptions or have the authority to direct or advise others to write prescriptions.

11. "Relating to" (and variations such as "in relation to") means, without limitation, relating to, referring to, concerning, describing, pertaining to, evidencing, reflecting, or constituting.

12. "Respondent" or "You" shall mean [redacted], any business in which [redacted] has an interest, or any business entity acting on [redacted] behalf.

III. REQUESTS FOR PRODUCTION OF DOCUMENTS

Please produce the following Documents for the **Relevant Time Period**, unless otherwise specified. In lieu of providing Documents, You may provide a detailed written answer or spreadsheet, where appropriate and responsive.

1. All agreements, contracts, statements of work or other Documents reflecting or relating to any services Respondent provided to any Opioid Manufacturer.

2. All Communications with Opioid Manufacturers and Pain-Related Organizations concerning the content or distribution of Pain-Related Materials, together with related Documents, including any drafts, redlines, or notes.

3. All Documents Respondent provided to or received from any federal or state law enforcement agency or any United States Senate or United States House of Representatives committee or subcommittee regarding Opioids.

4. A complete copy of each document containing or reflecting a sworn deposition or other sworn or unsworn testimony (including interviews) by Respondent in an investigation or legal proceeding related to Opioids, an Opioid Manufacturer, pain, or the treatment of pain.

5. Respondent's most current curriculum vitae.

6. Documents sufficient to Identify, by year, all financial support and/or income Respondent received from any Opioid Manufacturer or Pain-Related Organization for any purpose, including the identity of the payer, the date, the amount, and the reason for the payment.

7. Documents sufficient to Identify all Pain-Related Materials to which Respondent contributed or which Respondent edited or reviewed and describe the nature of Respondent's contribution, or editing or reviewing activities and the nature of any contribution, editing or reviewing activity by Opioid Manufacturers, if applicable.

8. Documents sufficient to Identify all instances not included in the response to Request (4) in which Respondent has provided sworn deposition or other sworn or unsworn statements (including interviews) in an investigation or legal proceeding related to Opioids, an Opioid Manufacturer, pain, or the treatment of pain, including the date the statement was taken and the entity conducting the investigation or docket number and court for the legal proceeding, if applicable.

9. Unless otherwise reflected in Respondent's curriculum vitae, Documents sufficient to reflect whether and when Respondent acted as a board member or in an advisory capacity for any Opioid Manufacturer or Pain-Related Organization.

Exhibit 8

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL
ONE ASHBURTON PLACE
BOSTON, MASSACHUSETTS 02108

MAURA HEALEY
ATTORNEY GENERAL

(617) 727-2200
(617) 727-4765 TTY
www.mass.gov/ago

CIVIL INVESTIGATIVE DEMAND
FOR DOCUMENTS AND TESTIMONY

CID-2017-FCD-52
Issued November 13, 2017

Via Electronic Mail

TO: [redacted]

YOU ARE HEREBY REQUIRED to (a) to produce and deliver documentary materials and (b) to appear and offer oral testimony under oath as described in this Civil Investigative Demand ("CID") to the Attorney General of the Commonwealth of Massachusetts in accordance with the Definitions and Instructions in this CID. The Attorney General has issued this CID pursuant to Massachusetts General Laws, Chapter 93A, Section 6, which authorizes the Attorney General to investigate possible unfair or deceptive methods, acts, or practices in violation of Chapter 93A, Section 2(a). This investigation relates to allegations of unfair or deceptive acts or practices in the marketing and sale of opioids in Massachusetts in violation of Massachusetts General Laws Chapter 93A, Section 2(a), and other Massachusetts laws and regulations. This CID requires that You produce documents and offer oral testimony under oath pursuant to G.L. c. 93A, § 6(1).

DOCUMENTARY MATERIALS: You are hereby required to produce and deliver, for examination and copying, the requested documentary material in your possession, custody, or control on or before December 15, 2017 by delivering them to Gillian Feiner, Assistant Attorney General, False Claims Division, Office of the Attorney General, One Ashburton Place, Boston, Massachusetts 02108. The materials provided to the Attorney General should be accompanied by an affidavit signed by You. The affidavit should state that the production is full and complete, and, to the extent that any documents are withheld from production under a claim of privilege, the affidavit should specify the nature of each document and the applicable legal privilege. The produced materials will be reviewed by Assistant Attorney General Feiner and

such other employees, agents, and experts of the Office of the Attorney General as needed as part of this investigation.

ORAL TESTIMONY: You are hereby required to appear and offer testimony under oath at an examination that shall be conducted by one or more Assistant Attorneys General at the Office of the Attorney General, 100 Cambridge Street, 10th Floor, Boston, Massachusetts starting at 10:00 AM on January 17, 2018, or at another mutually agreeable time and/or location concerning the subject matter of this investigation, including, but not limited to, (a) the documentary materials demanded by this CID, (b) those documentary materials produced by You in response to that CID, and (c) Your methods, acts, practices, training and results in the marketing, sale and treatment of patients with opioids.

At any time prior to the date specified in the notice, or within twenty-one days after the notice has been served, whichever period is shorter, the court may, upon motion for good cause shown, extend such reporting date or modify or set aside such demand or grant a protective order in accordance with the standards set forth in Rule 26(c) of the Massachusetts Rules of Civil Procedure.

COMMONWEALTH OF MASSACHUSETTS

MAURA HEALEY
ATTORNEY GENERAL

By: Gillian Feiner Digitally signed by Gillian Feiner DN: cn=Gillian Feiner o=Office of the Massachusetts Attorney General ou=False Claims Division email=gillian feiner@state ma us c=US Date: 2017 11 13 11:35:13 05'00'

Gillian Feiner
Chief, False Claims Division
Office of the Attorney General
One Ashburton Place
Boston, MA 02108
Tel: 617-963-2571 (direct dial)
gillian.feiner@state.ma.us

I. INSTRUCTIONS FOR DOCUMENT REQUESTS

1. **Organization of Responses:** The documents produced shall be identified and segregated to correspond with the number of the request. All documents produced must be marked with consecutive document control numbers, *i.e.* Bates stamped. If a document is responsive to more than one request, identical copies of the document need not be produced. However, any copy of a document that differs in any manner, including but not limited to versions, dates, or the presence of handwritten notations, shall be produced. All marginalia, post-its, and electronic and paper attachments to responsive documents shall be produced attached to the responsive documents.

2. **Duty to Preserve Documents:** All documents and/or other data which relate to the subject matter or requests of this subpoena must be preserved. Any destruction involving such documents must cease, even if it is your normal or routine course of business to delete or destroy such documents or data and even if you believe such documents or data are privileged or otherwise need not be produced.

3. **Documents No Longer in Possession of Respondent/Destroyed Documents:** If any responsive document was, but no longer is, in your possession, custody or control, produce a description of each such document. The description shall include the following:

    a. a detailed description of the content of the document;
    b. the name of each author, sender, creator, and initiator of such document;
    c. the name of each recipient, addressee, or party for whom such document was intended;
    d. the date the document was created;
    e. the date(s) the document was in use;
    f. the reason it is no longer in your possession, custody or control; and
    g. the document's current location.

    If the document is no longer in existence, in addition to providing the information indicated above, state on whose instructions the document was destroyed or otherwise disposed of, and the date and manner of the disposal.

4. **Production:** see Appendix I: Special Instructions for Electronically Produced or Stored Material, attached.

5. **Privileged Documents/Privilege Log:** If any responsive document is withheld under any claim of privilege, provide a detailed privilege log that contains at least the following information for each document that you have withheld:

    a. the general subject matter of the document;
    b. the claimed grounds for withholding the document, including but not limited to the nature of any claimed privilege and grounds in support thereof.
    c. the name of each author, writer, sender, creator, or initiator of such document;

d. the name of each recipient, addressee, or party for whom such document was intended; and
e. the date of such document, or an estimate thereof if no date appears on the document.

6. **Duty to Supplement:** All document requests are continuing in nature so as to require supplemental production if you obtain further responsive documents or information. You are also are required to amend your responses to the requests contained within this subpoena if you discover that the previous response was incorrect or incomplete.

7. **Relevant Time Period:** Unless otherwise noted, the relevant time period for which documents are requested is from January 1, 2004, to the present. In each instance in which a document is produced in response to a request, the current edition should be produced together with all earlier editions, or predecessor documents during the relevant time period, even though the title of earlier documents may differ from current versions.

8. **Inclusive Interpretation:** If use of the words "and," "or," or "and/or" create any doubt about the inclusiveness of a specific subpoena paragraph or request, adopt the meaning resulting in the provision of more—rather than less—information. If the use of the words "any" or "all" create doubt about the inclusiveness of a specific subpoena paragraph or request, adopt the meaning resulting in the provision of more—rather than less—information, including the collective as well as the singular.

II. DEFINITIONS

For the purpose of this subpoena, the following words or terms have the following definitions:

1. "Communications" shall mean any conversation, discussion, letter, email, memorandum, meeting, note or other transmittal of information or message, whether transmitted in writing, orally, electronically or by any other means, and shall include any document that abstracts, digests, transcribes, records or reflects any of the foregoing.

2. "Document(s)" shall mean the original (or duplicate, identical copies when originals are not available), and any non-identical copies (whether different from the original because of notes made on such copies or otherwise) of all written or graphic matter, recordings, or ESI, whether in final or draft form, however produced, or reproduced, of every kind and description in your actual or constructive possession, custody, care or control, including notes, letters, memoranda, ledgers, worksheets, records, books of account, accounting records, brochures, circulars, advertisements, proofs, sheets, books, magazines, reprints, summaries, reports, studies, projections, notebooks, diaries, calendars, appointment books, registers, graphs, charts, sketches, photographs, images, drawings, plans, tables, calculations, specifications, analyses, inter-corporate communications, papers, writings, agreements, contracts, purchase orders, acknowledgments, receipts, shipping papers, checks, invoices, authorizations, budgets, schedules, transcripts, correspondence, drafts, telegrams, cables, telexes, e-mails,

website content, memoranda of telephone conversations, sound recordings, minutes of meetings, drafts of any of the foregoing which are non-identical because of marginal notations or otherwise, other documents as appropriate in context, and other data or data compilations, stored in any medium from which information can be obtained either directly or, if necessary, after translation by the responding party into a reasonably usable form. Any internal audit, review, examination, critique or report of any of Respondent's practices and procedures is included within this term. "Document" also includes the file, folder tabs, or containers and labels associated with each original or copy.

3. "Employee" shall mean and include, but is not limited to, all current or former salaried employees, hourly employees, independent contractors, and individuals performing work as temporary employees.

4. "Identify" (and variations such as "identity" or identification") shall mean the following:

    a. With respect to a natural person, the complete name, any assumed name or alias, date of birth, occupation, title(s), job responsibilities, street and mailing address for both home and business at the time in question and at the time of responding (if different), home, cellular, and business telephone numbers, and personal and business email addresses;

    b. With respect to a non-natural person, its name, business address, legal address, state(s) of incorporation, registered or unregistered trade name(s), name(s) under which it does business, electronic email domains and websites operated by the entity, tax identification number, and the identity of its agent(s) for the service of process; and

    c. With respect to a document, its identification number, its title, its date, its location, its signatory, its description (e.g., memorandum, letter, contract, form), and the number of pages

5. "Opioid Manufacturer" means any manufacturer, or holder of a New Drug Application of Abbreviated New Drug Application for any Opioid.

6. "Opioid" shall mean all naturally occurring, synthetic, or semisynthetic substances that bind to opioid receptors and act like opium, including but not limited to, hydrocodone, hydromorphone, oxycodone, oxymorphone, fentanyl, methadone, buprenorphine, meperidine, morphine, opium, and codeine.

7. "Pain-Related Materials" shall refer to presentations and publications in any form sponsored and/or funded in whole or in part by any Opioid Manufacturer or Pain-Related Organization and related to pain treatment, including, but not limited to: continuing medical education or training materials, books, articles, research, guides or scales for use by Opioid prescribers or patients using Opioids, web content, blog posts,

pamphlets, CD-ROMs, or slideshows. Pain-Related Materials shall include, without limitation:

a. American Academy of Pain Medicine and American Pain Society's 1997 Consensus Statement, *The Use of Opioids for the Treatment of Chronic Pain*

b. American Academy of Pain Medicine and American Pain Society's 2009 Guidelines, *Clinical Guidelines for the Use of Chronic Opioid Therapy in Chronic Noncancer Pain*

c. Academy of Integrative Pain Management's (f/k/a American Academy of Pain Management) *Opioid Prescribing: Clinical Tools and Risk Management Strategies*

d. American Medical Association's *Module 2 Pain Management: Overview of Treatment Options*

e. American Pain Foundation's *Treatment Options: A Guide for People Living with Pain*

f. American Pain Foundation's *Exit Wounds*

g. Federation of State Medical Boards' *Responsible Opioid Prescribing*

h. Medscape's *Optimizing Opioid Treatment for Breakthrough Pain*

i. Purdue's *Managing Patient's Opioid Use: Balancing the Need and Risk*

j. Opioid Risk Tool

k. Avoiding Opioid Abuse While Managing Pain

8. "Pain-Related Organization" shall refer to any group or entity involved in advocacy, educational, or lobbying activities concerning the issue of pain treatment or opioid prescribing during the relevant time period, including, but not limited to the American Pain Foundation, the American Pain Society, the American Academy of Pain Medicine, and the Academy of Integrative Pain Management, and the Pain Care Forum.

9. "Person" shall mean any natural person or such person's legal representative; any partnership, domestic or foreign corporation, or limited liability company; any company, trust, business entity, or association; and any agent, employee, salesman, partner, officer, director, member, stockholder, associate, or trustee.

10. "Prescribers" shall mean doctors, dentists, physicians' assistants, nurse practitioners, therapists, hospitals, clinics, pharmacists, and other medical personnel who write prescriptions or have the authority to direct or advise others to write prescriptions.

11. "Relating to" (and variations such as "in relation to") means, without limitation, relating to, referring to, concerning, describing, pertaining to, evidencing, reflecting, or constituting.

12. "Respondent" or "You" shall mean [redacted], any business in which [redacted] has an interest, or any business entity acting on [redacted] behalf.

III. REQUESTS FOR PRODUCTION OF DOCUMENTS

Please produce the following Documents for the **Relevant Time Period**, unless otherwise specified. In lieu of providing Documents, You may provide a detailed written answer or spreadsheet, where appropriate and responsive.

1. All agreements, contracts, statements of work or other Documents reflecting or relating to any services Respondent provided to any Opioid Manufacturer.

2. All Communications with Opioid Manufacturers and Pain-Related Organizations concerning the content or distribution of Pain-Related Materials, together with related Documents, including any drafts, redlines, or notes.

3. All Documents Respondent provided to or received from any federal or state law enforcement agency or any United States Senate or United States House of Representatives committee or subcommittee regarding Opioids.

4. A complete copy of each document containing or reflecting a sworn deposition or other sworn or unsworn testimony (including interviews) by Respondent in an investigation or legal proceeding related to Opioids, an Opioid Manufacturer, pain, or the treatment of pain.

5. Respondent's most current curriculum vitae.

6. Documents sufficient to Identify, by year, all financial support and/or income Respondent received from any Opioid Manufacturer or Pain-Related Organization for any purpose, including the identity of the payer, the date, the amount, and the reason for the payment.

7. Documents sufficient to Identify all Pain-Related Materials to which Respondent contributed or which Respondent edited or reviewed and describe the nature of Respondent's contribution, or editing or reviewing activities and the nature of any contribution, editing or reviewing activity by Opioid Manufacturers, if applicable.

8. Documents sufficient to Identify all instances not included in the response to Request (4) in which Respondent has provided sworn deposition or other sworn or unsworn statements (including interviews) in an investigation or legal proceeding related to Opioids, an Opioid Manufacturer, pain, or the treatment of pain, including the date the

statement was taken and the entity conducting the investigation or docket number and court for the legal proceeding, if applicable.

9. Unless otherwise reflected in Respondent's curriculum vitae, Documents sufficient to reflect whether and when Respondent acted as a board member or in an advisory capacity for any Opioid Manufacturer or Pain-Related Organization.

Exhibit 9

COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

CIVIL INVESTIGATIVE DEMAND
FOR DOCUMENTS AND TESTIMONY

CID-2017-HCD-12
Issued November 14, 2017

TO: [redacted]

YOU ARE HEREBY REQUIRED to (a) to produce and deliver documentary materials and (b) to appear and offer oral testimony under oath as described in this Civil Investigative Demand ("CID") to the Attorney General of the Commonwealth of Massachusetts in accordance with the Definitions and Instructions in this CID. The Attorney General has issued this CID pursuant to Massachusetts General Laws, Chapter 93A, Section 6, which authorizes the Attorney General to investigate possible unfair or deceptive methods, acts, or practices in violation of Chapter 93A, Section 2(a). This investigation relates to allegations of unfair or deceptive acts or practices in the marketing and sale of opioids by Purdue Pharma L.P. in Massachusetts in violation of Massachusetts General Laws Chapter 93A, Section 2(a), and other Massachusetts laws and regulations. This CID requires that You produce documents and offer oral testimony under oath pursuant to G.L. c. 93A, § 6(1).

The Attorney General has issued this CID as part of the Office of the Attorney General's oversight of the Massachusetts health care system as a "health oversight agency," as that term is defined and used in 45 C.F.R. §§ 164.501 and 164.512(d) of the federal Standards for Privacy of Individually Identifiable Health Information that implements the privacy requirements of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Providing the requested information is also a permitted disclosure under HIPAA because it is "required by law" pursuant to 45 C.F.R. § 164.512(a) and made "for law enforcement purposes," pursuant to 45 C.F.R. § 164.512(f), including that it complies with the HIPAA standard for disclosures to law enforcement officials set forth in 45 C.F.R. § 164.512(f)(1)(ii)(C), namely, that the information sought is relevant and material to a legitimate law enforcement inquiry, the request is specific and limited in scope to the extent reasonably practicable, and de-identified information cannot reasonably be used to complete the investigation.

DOCUMENTARY MATERIALS: You are hereby required to produce and deliver, for examination and copying, the requested documentary material in your possession, custody, or control on or before December 13, 2017 by delivering them to Stephen B. Vogel, Assistant Attorney General, Health Care Division, Office of the Attorney General, One Ashburton Place, Boston, Massachusetts 02108. The materials provided to the Attorney General should be accompanied by an affidavit signed by You. The affidavit should state that the production is full and complete, and, to the extent that any documents are withheld from production under a claim of privilege, the affidavit should specify the nature of each document and the applicable legal privilege. The produced materials will be reviewed by Assistant Attorney General Vogel and

such other employees, agents, and experts of the Office of the Attorney General as needed as part of this investigation.

ORAL TESTIMONY: You are hereby required to appear and offer testimony under oath at an examination that shall be conducted by one or more Assistant Attorneys General at the Office of the Attorney General, 100 Cambridge Street, 10th Floor, Boston, Massachusetts starting at 10:00 AM on December 20, 2017, or at another mutually agreeable time and/or location concerning the subject matter of this investigation, including, but not limited to, (a) the documentary materials demanded by this CID, (b) those documentary materials produced by You in response to that CID, and (c) Your methods, acts, practices, training and results in the marketing and sale of opioids by Purdue Pharma L.P.

INSTRUCTIONS

1. The documents submitted in response to this CID shall include all relevant documents in Your possession, custody, or control, including but not limited to documents maintained or stored at Your offices, or at any other location(s) where You do business or maintain or store documents.

2. In each instance in which a document is produced in response to a request, the current edition should be produced together with all earlier editions, drafts, or predecessor documents during the relevant time period, even though the title of the earlier documents may differ from current versions.

3. To the extent that documents are found in file folders and other similar containers that have labels or other identifying information, the documents shall be produced with such file folder and label information intact.

4. The documents submitted in response to this CID shall be marked or organized in such a way as to identify the document request (by number) to which each document is responsive.

5. Unless otherwise specified and agreed by the Office of the Attorney General, responsive documents maintained as electronic documents in the regular course of business must be produced as electronic documents. Documents maintained in hard copy may be produced in either electronic or hard copy format. To the extent hard copy and electronic documents are produced in electronic format, the Attorney General requests that all such documents be produced in electronic format suitable for loading into ONE Platform by Driven, Inc., including a text file and a load file containing all metadata. All Excel spreadsheets should be produced in native file format. See the attached AGO Data Delivery Specification for further technical specifications applicable to production of documents in electronic format.

6. If You withhold any requested document under any claim of privilege, please provide a list identifying each document for which You are claiming privilege, the author(s) and recipient(s) of the document, the date of the document, the nature of the document, the subject matter of the document, and the nature and basis of the privilege.

7. If any document requested in this CID is no longer in Your possession or custody or subject to Your control, please identify the document by its author(s), recipients(s), date and subject matter, and state whether the document is lost, has been destroyed, or has been transferred to others (and, if the latter, identify the transferee(s)).

8. Please mark each page with an identifying "Bates" mark and number each page sequentially. The marks should not obscure any information on the document.

9. Unless otherwise specified, this CID applies to documents in effect, created, recorded, compiled, transmitted, and/or received at any time from 2007 to the present. This document request is continuing in nature so as to require supplementing documents if You obtain further responsive documents.

10. If You believe that the production of documents as required by this Civil Investigative Demand would be unduly burdensome, or if You require clarification of any request, please contact Assistance Attorney General Vogel within ten (10) days of receipt hereof.

DEFINITIONS

1. "Communication" means the transmittal of information (in the form of facts, opinions, ideas, inquiries, or otherwise).

2. "Concerning" means referring to, describing, offering evidence of, or constituting.

3. "Document(s)" is defined to be synonymous in meaning and equal in scope to the usage of this term in Mass. R. Civ. P. 34 (a). An earlier draft is a separate document within the meaning of this term.

4. "Purdue" means Purdue Pharma L.P. and all of its predecessors, successors, parent corporations, affiliates, subdivisions, subsidiaries, officers, directors, agents, servants, and/or employees.

5. "You" means [redacted] and any of his attorneys or agents.

6. To the extent necessary to bring into the scope of the document requests any document that might otherwise be construed to be outside their scope (a) the word "or" means "and/or," (b) the word "and" means "and/or," (c) the word "all" means "any and all," (d) the word "any" means "any and all," (e) the word "each" means "each and every," (f) the word "every" means "each and every," and (g) the singular form of a word includes the plural form, and the plural includes the singular.

REQUESTS TO PRODUCE DOCUMENTS

Please produce the following:

1. All documents relating, directly or indirectly, to the marketing, or promotion, of Purdue-branded opioids in Massachusetts, including, but not limited to, marketing materials, emails, customer target lists, clinical reprints, travel and entertainment budget and expense

reports, budgets for and/or spending on marketing or educational events, sales training and compliance documents, documents relating to the allocation and distribution of samples, and documents relating to or constituting correspondence or other communication to or from any person regarding such marketing or solicitation, however maintained.

2. All documents relating, directly or indirectly, to any training received, performed or attended by you concerning, specifically or generally, the marketing, or promotion, of any Purdue-branded opioid.

3. All documents relating, directly or indirectly, to your relationship with Purdue, including, but not limited to, any communications from Purdue relating to the marketing or promoting of Purdue-branded opioids, contracts or agreements with Purdue, documents relating to compensation, performance, evaluations, employee manuals or sales manuals, ride-along reports, commendations, awards, complaints, and records of disciplinary action.

Dated: Boston, Massachusetts
November 14, 2017

COMMONWEALTH OF MASSACHUSETTS

MAURA HEALEY
ATTORNEY GENERAL

Stephen B. Vogel
Assistant Attorney General
Health Care Division
Office of the Attorney General
One Ashburton Place
Boston, MA 02108
617-963-2415
stephen.vogel@state.ma.us

Exhibit 10

COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

CIVIL INVESTIGATIVE DEMAND FOR DOCUMENTS AND TESTIMONY

CID-2017-HCD-13
Issued November 21, 2017

TO: [redacted]

YOU ARE HEREBY REQUIRED to (a) to produce and deliver documentary materials and (b) to appear and offer oral testimony under oath as described in this Civil Investigative Demand ("CID") to the Attorney General of the Commonwealth of Massachusetts in accordance with the Definitions and Instructions in this CID. The Attorney General has issued this CID pursuant to Massachusetts General Laws, Chapter 93A, Section 6, which authorizes the Attorney General to investigate possible unfair or deceptive methods, acts, or practices in violation of Chapter 93A, Section 2(a). This investigation relates to allegations of unfair or deceptive acts or practices in the marketing and sale of opioids by Purdue Pharma L.P. in Massachusetts in violation of Massachusetts General Laws Chapter 93A, Section 2(a), and other Massachusetts laws and regulations. This CID requires that You produce documents and offer oral testimony under oath pursuant to G.L. c. 93A, § 6(1).

The Attorney General has issued this CID as part of the Office of the Attorney General's oversight of the Massachusetts health care system as a "health oversight agency," as that term is defined and used in 45 C.F.R. §§ 164.501 and 164.512(d) of the federal Standards for Privacy of Individually Identifiable Health Information that implements the privacy requirements of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Providing the requested information is also a permitted disclosure under HIPAA because it is "required by law" pursuant to 45 C.F.R. § 164.512(a) and made "for law enforcement purposes," pursuant to 45 C.F.R. § 164.512(f), including that it complies with the HIPAA standard for disclosures to law enforcement officials set forth in 45 C.F.R. § 164.512(f)(1)(ii)(C), namely, that the information sought is relevant and material to a legitimate law enforcement inquiry, the request is specific and limited in scope to the extent reasonably practicable, and de-identified information cannot reasonably be used to complete the investigation.

DOCUMENTARY MATERIALS: You are hereby required to produce and deliver, for examination and copying, the requested documentary material in your possession, custody, or control on or before January 5, 2018 by delivering them to Michael W. Wong, Assistant Attorney General, Office of the Attorney General, Health Care Division, One Ashburton Place, Boston, Massachusetts 02108. The materials provided to the Attorney General should be accompanied by an affidavit signed by You. The affidavit should state that the production is full and complete, and, to the extent that any documents are withheld from production under a claim of privilege, the affidavit should specify the nature of each document and the applicable legal

privilege. The produced materials will be reviewed by Assistant Attorney Michael W. Wong and such other employees, agents, and experts of the Office of the Attorney General as needed as part of this investigation.

ORAL TESTIMONY: You are hereby required to appear and offer testimony under oath at an examination that shall be conducted by one or more Assistant Attorneys General at the Office of the Attorney General, 100 Cambridge Street, 10th Floor, Boston, Massachusetts starting at 9:30 AM on January 12, 2018, or at another mutually agreeable time and/or location concerning the subject matter of this investigation, including, but not limited to, (a) the documentary materials demanded by this CID, (b) those documentary materials produced by You in response to that CID and (c) Your methods, acts, practices, training and results in the marketing and sale of opioids by Purdue Pharma L.P.

INSTRUCTIONS

1. The documents submitted in response to this CID shall include all relevant documents in Your possession, custody, or control, including but not limited to documents maintained or stored at Your offices, or at any other location(s) where You do business or maintain or store documents.

2. In each instance in which a document is produced in response to a request, the current edition should be produced together with all earlier editions, drafts, or predecessor documents during the relevant time period, even though the title of the earlier documents may differ from current versions.

3. To the extent that documents are found in file folders and other similar containers that have labels or other identifying information, the documents shall be produced with such file folder and label information intact.

4. The documents submitted in response to this CID shall be marked or organized in such a way as to identify the document request (by number) to which each document is responsive.

5. Unless otherwise specified and agreed by the Office of the Attorney General, responsive documents maintained as electronic documents in the regular course of business must be produced as electronic documents. Documents maintained in hard copy may be produced in either electronic or hard copy format. To the extent hard copy and electronic documents are produced in electronic format, the Attorney General requests that all such documents be produced in electronic format suitable for loading into ONE Platform by Driven, Inc., including a text file and a load file containing all metadata. All Excel spreadsheets should be produced in native file format. See the attached AGO Data Delivery Specification for further technical specifications applicable to production of documents in electronic format.

6. If You withhold any requested document under any claim of privilege, please provide a list identifying each document for which You are claiming privilege, the author(s) and

recipient(s) of the document, the date of the document, the nature of the document, the subject matter of the document, and the nature and basis of the privilege.

7. If any document requested in this CID is no longer in Your possession or custody or subject to Your control, please identify the document by its author(s), recipients(s), date and subject matter, and state whether the document is lost, has been destroyed, or has been transferred to others (and, if the latter, identify the transferee(s)).

8. Please mark each page with an identifying "Bates" mark and number each page sequentially. The marks should not obscure any information on the document.

9. Unless otherwise specified, this CID applies to documents in effect, created, recorded, compiled, transmitted, and/or received at any time from 2007 to the present. This document request is continuing in nature so as to require supplementing documents if You obtain further responsive documents.

10. If You believe that the production of documents as required by this Civil Investigative Demand would be unduly burdensome, or if You require clarification of any request, please contact Assistance Attorney General Michael W. Wong within ten (10) days of receipt hereof.

DEFINITIONS

1. "Communication" means the transmittal of information (in the form of facts, opinions, ideas, inquiries, or otherwise).

2. "Concerning" means referring to, describing, offering evidence of, or constituting.

3. "Document(s)" is defined to be synonymous in meaning and equal in scope to the usage of this term in Mass. R. Civ. P. 34 (a). An earlier draft is a separate document within the meaning of this term.

4. "Purdue" means Purdue Pharma L.P. and all of its predecessors, successors, parent corporations, affiliates, subdivisions, subsidiaries, officers, directors, agents, servants and/or employees.

5. "You" means [redacted] and any of her attorneys or agents.

6. To the extent necessary to bring into the scope of the document requests any document that might otherwise be construed to be outside their scope (a) the word "or" means "and/or," (b) the word "and" means "and/or," (c) the word "all" means "any and all," (d) the word "any" means "any and all," (e) the word "each" means "each and every," (f) the word "every" means "each and every" and (g) the singular form of a word includes the plural form, and the plural includes the singular.

REQUESTS TO PRODUCE DOCUMENTS

Please produce the following:

1. All documents relating, directly or indirectly to the marketing, or promotion, of Purdue-branded opioids in Massachusetts, including, but not limited to, marketing materials, emails, customer target lists, clinical reprints, travel and entertainment budget and expense reports, budgets for and/or spending on marketing or educational events, sales training and compliance documents, documents relating to the allocation and distribution of samples and documents relating to or constituting correspondence or other communication to or from any person regarding such marketing or solicitation, however maintained.

2. All documents relating, directly or indirectly to any training received, performed or attended by you concerning, specifically or generally, the marketing, or promotion, of any Purdue-branded opioid.

3. All documents relating, directly or indirectly to your relationship with Purdue, including, but not limited to, any communications from Purdue relating to the marketing or promoting of Purdue-branded opioids, contracts or agreements with Purdue, documents relating to compensation, performance, evaluations, employee manuals or sales manuals, ride-along reports, commendations, awards, complaints, and records of disciplinary action.

Dated: Boston, Massachusetts
November 21, 2017

COMMONWEALTH OF MASSACHUSETTS

MAURA HEALEY
ATTORNEY GENERAL

Michael W. Wong
Assistant Attorney General
Health Care Division
Health Care and Fair Competition Bureau
One Ashburton Place
Boston, MA 02108
617-727-2200, ext. 2918

Exhibit 11

COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

CIVIL INVESTIGATIVE DEMAND FOR DOCUMENTS AND TESTIMONY

CID-2017-HCD-16
Issued December 1, 2017

TO: [redacted]

YOU ARE HEREBY REQUIRED to (a) to produce and deliver documentary materials and (b) to appear and offer oral testimony under oath as described in this Civil Investigative Demand ("CID") to the Attorney General of the Commonwealth of Massachusetts in accordance with the Definitions and Instructions in this CID. The Attorney General has issued this CID pursuant to Massachusetts General Laws, Chapter 93A, Section 6, which authorizes the Attorney General to investigate possible unfair or deceptive methods, acts, or practices in violation of Chapter 93A, Section 2(a). This investigation relates to allegations of unfair or deceptive acts or practices in the marketing and sale of opioids by Purdue Pharma L.P. in Massachusetts in violation of Massachusetts General Laws Chapter 93A, Section 2(a), and other Massachusetts laws and regulations. This CID requires that You produce documents and offer oral testimony under oath pursuant to G.L. c. 93A, § 6(1).

The Attorney General has issued this CID as part of the Office of the Attorney General's oversight of the Massachusetts health care system as a "health oversight agency," as that term is defined and used in 45 C.F.R. §§ 164.501 and 164.512(d) of the federal Standards for Privacy of Individually Identifiable Health Information that implements the privacy requirements of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Providing the requested information is also a permitted disclosure under HIPAA because it is "required by law" pursuant to 45 C.F.R. § 164.512(a) and made "for law enforcement purposes," pursuant to 45 C.F.R. § 164.512(f), including that it complies with the HIPAA standard for disclosures to law enforcement officials set forth in 45 C.F.R. § 164.512(f)(1)(ii)(C), namely, that the information sought is relevant and material to a legitimate law enforcement inquiry, the request is specific and limited in scope to the extent reasonably practicable, and de-identified information cannot reasonably be used to complete the investigation.

DOCUMENTARY MATERIALS: You are hereby required to produce and deliver, for examination and copying, the requested documentary material in your possession, custody, or control on or before January 4, 2018 by delivering them to Stephen B. Vogel, Assistant Attorney General, Health Care Division, Office of the Attorney General, One Ashburton Place, Boston, Massachusetts 02108. The materials provided to the Attorney General should be accompanied by an affidavit signed by You. The affidavit should state that the production is full and complete, and, to the extent that any documents are withheld from production under a claim of privilege, the affidavit should specify the nature of each document and the applicable legal privilege. The produced materials will be reviewed by Assistant Attorney General Vogel and

such other employees, agents, and experts of the Office of the Attorney General as needed as part of this investigation.

ORAL TESTIMONY: You are hereby required to appear and offer testimony under oath at an examination that shall be conducted by one or more Assistant Attorneys General at the Office of the Attorney General, 100 Cambridge Street, 10th Floor, Boston, Massachusetts starting at 10:00 AM on January 11, 2018, or at another mutually agreeable time and/or location concerning the subject matter of this investigation, including, but not limited to, (a) the documentary materials demanded by this CID, (b) those documentary materials produced by You in response to that CID, and (c) Your methods, acts, practices, training and results in the marketing and sale of opioids by Purdue Pharma L.P.

INSTRUCTIONS

1. The documents submitted in response to this CID shall include all relevant documents in Your possession, custody, or control, including but not limited to documents maintained or stored at Your offices, or at any other location(s) where You do business or maintain or store documents.

2. In each instance in which a document is produced in response to a request, the current edition should be produced together with all earlier editions, drafts, or predecessor documents during the relevant time period, even though the title of the earlier documents may differ from current versions.

3. To the extent that documents are found in file folders and other similar containers that have labels or other identifying information, the documents shall be produced with such file folder and label information intact.

4. The documents submitted in response to this CID shall be marked or organized in such a way as to identify the document request (by number) to which each document is responsive.

5. Unless otherwise specified and agreed by the Office of the Attorney General, responsive documents maintained as electronic documents in the regular course of business must be produced as electronic documents. Documents maintained in hard copy may be produced in either electronic or hard copy format. To the extent hard copy and electronic documents are produced in electronic format, the Attorney General requests that all such documents be produced in electronic format suitable for loading into ONE Platform by Driven, Inc., including a text file and a load file containing all metadata. All Excel spreadsheets should be produced in native file format. See the attached AGO Data Delivery Specification for further technical specifications applicable to production of documents in electronic format.

6. If You withhold any requested document under any claim of privilege, please provide a list identifying each document for which You are claiming privilege, the author(s) and recipient(s) of the document, the date of the document, the nature of the document, the subject matter of the document, and the nature and basis of the privilege.

7. If any document requested in this CID is no longer in Your possession or custody or subject to Your control, please identify the document by its author(s), recipients(s), date and subject matter, and state whether the document is lost, has been destroyed, or has been transferred to others (and, if the latter, identify the transferee(s)).

8. Please mark each page with an identifying "Bates" mark and number each page sequentially. The marks should not obscure any information on the document.

9. Unless otherwise specified, this CID applies to documents in effect, created, recorded, compiled, transmitted, and/or received at any time from 2007 to the present. This document request is continuing in nature so as to require supplementing documents if You obtain further responsive documents.

10. If You believe that the production of documents as required by this Civil Investigative Demand would be unduly burdensome, or if You require clarification of any request, please contact Assistance Attorney General Vogel within ten (10) days of receipt hereof.

DEFINITIONS

1. "Communication" means the transmittal of information (in the form of facts, opinions, ideas, inquiries, or otherwise).

2. "Concerning" means referring to, describing, offering evidence of, or constituting.

3. "Document(s)" is defined to be synonymous in meaning and equal in scope to the usage of this term in Mass. R. Civ. P. 34 (a). An earlier draft is a separate document within the meaning of this term.

4. "Purdue" means Purdue Pharma L.P. and all of its predecessors, successors, parent corporations, affiliates, subdivisions, subsidiaries, officers, directors, agents, servants, and/or employees.

5. "You" means [redacted] and any of her attorneys or agents.

6. To the extent necessary to bring into the scope of the document requests any document that might otherwise be construed to be outside their scope (a) the word "or" means "and/or," (b) the word "and" means "and/or," (c) the word "all" means "any and all," (d) the word "any" means "any and all," (e) the word "each" means "each and every," (f) the word "every" means "each and every," and (g) the singular form of a word includes the plural form, and the plural includes the singular.

REQUESTS TO PRODUCE DOCUMENTS

Please produce the following:

1. All documents relating, directly or indirectly, to the marketing, or promotion, of Purdue-branded opioids in Massachusetts, including, but not limited to, marketing materials, emails, customer target lists, clinical reprints, travel and entertainment budget and expense

reports, budgets for and/or spending on marketing or educational events, sales training and compliance documents, documents relating to the allocation and distribution of samples, and documents relating to or constituting correspondence or other communication to or from any person regarding such marketing or solicitation, however maintained.

2. All documents relating, directly or indirectly, to any training received, performed or attended by you concerning, specifically or generally, the marketing, or promotion, of any Purdue-branded opioid.

3. All documents relating, directly or indirectly, to your relationship with Purdue, including, but not limited to, any communications from Purdue relating to the marketing or promoting of Purdue-branded opioids, contracts or agreements with Purdue, documents relating to compensation, performance, evaluations, employee manuals or sales manuals, ride-along reports, commendations, awards, complaints, and records of disciplinary action.

Dated: Boston, Massachusetts
December 1, 2017

COMMONWEALTH OF MASSACHUSETTS

MAURA HEALEY
ATTORNEY GENERAL

Stephen B. Vogel
Assistant Attorney General
Health Care Division
Office of the Attorney General
One Ashburton Place
Boston, MA 02108
617-963-2415
stephen.vogel@state.ma.us

Exhibit 12

COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

CIVIL INVESTIGATIVE DEMAND FOR DOCUMENTS AND TESTIMONY

CID-2017-FCD-54
Issued December 8, 2017

TO: [redacted]

YOU ARE HEREBY REQUIRED to (a) to produce and deliver documentary materials and (b) to appear and offer oral testimony under oath as described in this Civil Investigative Demand ("CID") to the Attorney General of the Commonwealth of Massachusetts in accordance with the Definitions and Instructions in this CID. The Attorney General has issued this CID pursuant to Massachusetts General Laws, Chapter 93A, Section 6, which authorizes the Attorney General to investigate possible unfair or deceptive methods, acts, or practices in violation of Chapter 93A, Section 2(a). This investigation relates to allegations of unfair or deceptive acts or practices in the marketing and sale of opioids by Purdue Pharma L.P. in Massachusetts in violation of Massachusetts General Laws Chapter 93A, Section 2(a), and other Massachusetts laws and regulations. This CID requires that You produce documents and offer oral testimony under oath pursuant to G.L. c. 93A, § 6(1).

The Attorney General has issued this CID as part of the Office of the Attorney General's oversight of the Massachusetts health care system as a "health oversight agency," as that term is defined and used in 45 C.F.R. §§ 164.501 and 164.512(d) of the federal Standards for Privacy of Individually Identifiable Health Information that implements the privacy requirements of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Providing the requested information is also a permitted disclosure under HIPAA because it is "required by law" pursuant to 45 C.F.R. § 164.512(a) and made "for law enforcement purposes," pursuant to 45 C.F.R. § 164.512(f), including that it complies with the HIPAA standard for disclosures to law enforcement officials set forth in 45 C.F.R. § 164.512(f)(1)(ii)(C), namely, that the information sought is relevant and material to a legitimate law enforcement inquiry, the request is specific and limited in scope to the extent reasonably practicable, and de-identified information cannot reasonably be used to complete the investigation.

DOCUMENTARY MATERIALS: You are hereby required to produce and deliver, for examination and copying, the requested documentary material in your possession, custody, or control on or before January 4, 2018 by delivering them to Jenny Wojewoda, Assistant Attorney General, Office of the Attorney General, One Ashburton Place, Boston, Massachusetts 02108. The materials provided to the Attorney General should be accompanied by an affidavit signed by You. The affidavit should state that the production is full and complete, and, to the extent that any documents are withheld from production under a claim of privilege, the affidavit should specify the nature of each document and the applicable legal privilege. The produced materials will be reviewed by Assistant Attorney General Jenny Wojewoda and such other employees, agents, and experts of the Office of the Attorney General as needed as part of this investigation.

ORAL TESTIMONY: You are hereby required to appear and offer testimony under oath at an examination that shall be conducted by one or more Assistant Attorneys General at the Office of the Attorney General, 100 Cambridge Street, 11th Floor, Boston, Massachusetts starting at 10 AM on January 18, 2018, or at another mutually agreeable time and/or location concerning the subject matter of this investigation, including, but not limited to, (a) the documentary materials demanded by this CID, (b) those documentary materials produced by You in response to that CID and (c) Your methods, acts, practices, training and results in the marketing and sale of opioids by Purdue Pharma L.P.

INSTRUCTIONS

1. The documents submitted in response to this CID shall include all relevant documents in Your possession, custody, or control, including but not limited to documents maintained or stored at Your offices, or at any other location(s) where You do business or maintain or store documents.

2. In each instance in which a document is produced in response to a request, the current edition should be produced together with all earlier editions, drafts, or predecessor documents during the relevant time period, even though the title of the earlier documents may differ from current versions.

3. To the extent that documents are found in file folders and other similar containers that have labels or other identifying information, the documents shall be produced with such file folder and label information intact.

4. The documents submitted in response to this CID shall be marked or organized in such a way as to identify the document request (by number) to which each document is responsive.

5. If You withhold any requested document under any claim of privilege, please provide a list identifying each document for which You are claiming privilege, the author(s) and recipient(s) of the document, the date of the document, the nature of the document, the subject matter of the document, and the nature and basis of the privilege.

6. If any document requested in this CID is no longer in Your possession or custody or subject to Your control, please identify the document by its author(s), recipients(s), date and subject matter, and state whether the document is lost, has been destroyed, or has been transferred to others (and, if the latter, identify the transferee(s)).

7. Please mark each page with an identifying "Bates" mark and number each page sequentially. The marks should not obscure any information on the document.

8. Unless otherwise specified, this CID applies to documents in effect, created, recorded, compiled, transmitted, and/or received at any time from August 13, 2008 to the present. This document request is continuing in nature so as to require supplementing documents if You obtain further responsive documents.

9. If You believe that the production of documents as required by this Civil Investigative Demand would be unduly burdensome, or if You require clarification of any request, please contact Assistance Attorney General Jenny Wojewoda within ten (10) days of receipt hereof.

DEFINITIONS

1. "Communication" means the transmittal of information (in the form of facts, opinions, ideas, inquiries, or otherwise).

2. "Concerning" means referring to, describing, offering evidence of, or constituting.

3. "Document(s)" is defined to be synonymous in meaning and equal in scope to the usage of this term in Mass. R. Civ. P. 34 (a). An earlier draft is a separate document within the meaning of this term.

4. "Purdue" means Purdue Pharma L.P. and all of its predecessors, successors, parent corporations, affiliates, subdivisions, subsidiaries, officers, directors, agents, servants and/or employees.

5. "You" means [redacted] and any of her attorneys or agents.

6. To the extent necessary to bring into the scope of the document requests any document that might otherwise be construed to be outside their scope (a) the word "or" means "and/or," (b) the word "and" means "and/or," (c) the word "all" means "any and all," (d) the word "any" means "any and all," (e) the word "each" means "each and every," (f) the word "every" means "each and every" and (g) the singular form of a word includes the plural form, and the plural includes the singular.

REQUESTS TO PRODUCE DOCUMENTS

Please produce the following:

1. All documents relating, directly or indirectly to the marketing, or promotion, of Purdue-branded opioids in Massachusetts, including, but not limited to, marketing materials, emails, customer target lists, clinical reprints, travel and entertainment budget and expense reports, budgets for and/or spending on marketing or educational events, sales training and compliance documents, documents relating to the allocation and distribution of samples and documents relating to or constituting correspondence or other communication to or from any person regarding such marketing or solicitation, however maintained.

2. All documents relating, directly or indirectly to any training received, performed or attended by you concerning, specifically or generally, the marketing, or promotion, of any Purdue-branded opioid.

3. All documents relating, directly or indirectly to your relationship with Purdue, including, but not limited to, any communications from Purdue relating to the marketing or promoting of Purdue-branded opioids, contracts or agreements with Purdue, documents relating

to compensation, performance, evaluations, employee manuals or sales manuals, ride-along reports, commendations, awards, complaints, and records of disciplinary action.

Dated: Boston, Massachusetts
December 8, 2017

COMMONWEALTH OF MASSACHUSETTS

MAURA HEALEY
ATTORNEY GENERAL

Jenny Wojewoda
Assistant Attorney General
Health Care and Fair Competition Bureau
One Ashburton Place
Boston, MA 02108
617-727-2200, ext. 2547

Exhibit 13

COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

CIVIL INVESTIGATIVE DEMAND FOR DOCUMENTS AND TESTIMONY

CID-2017-FCD-55
Issued December 8, 2017

TO: [redacted]

YOU ARE HEREBY REQUIRED to (a) to produce and deliver documentary materials and (b) to appear and offer oral testimony under oath as described in this Civil Investigative Demand ("CID") to the Attorney General of the Commonwealth of Massachusetts in accordance with the Definitions and Instructions in this CID. The Attorney General has issued this CID pursuant to Massachusetts General Laws, Chapter 93A, Section 6, which authorizes the Attorney General to investigate possible unfair or deceptive methods, acts, or practices in violation of Chapter 93A, Section 2(a). This investigation relates to allegations of unfair or deceptive acts or practices in the marketing and sale of opioids by Purdue Pharma L.P. in Massachusetts in violation of Massachusetts General Laws Chapter 93A, Section 2(a), and other Massachusetts laws and regulations. This CID requires that You produce documents and offer oral testimony under oath pursuant to G.L. c. 93A, § 6(1).

The Attorney General has issued this CID as part of the Office of the Attorney General's oversight of the Massachusetts health care system as a "health oversight agency," as that term is defined and used in 45 C.F.R. §§ 164.501 and 164.512(d) of the federal Standards for Privacy of Individually Identifiable Health Information that implements the privacy requirements of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Providing the requested information is also a permitted disclosure under HIPAA because it is "required by law" pursuant to 45 C.F.R. § 164.512(a) and made "for law enforcement purposes," pursuant to 45 C.F.R. § 164.512(f), including that it complies with the HIPAA standard for disclosures to law enforcement officials set forth in 45 C.F.R. § 164.512(f)(1)(ii)(C), namely, that the information sought is relevant and material to a legitimate law enforcement inquiry, the request is specific and limited in scope to the extent reasonably practicable, and de-identified information cannot reasonably be used to complete the investigation.

DOCUMENTARY MATERIALS: You are hereby required to produce and deliver, for examination and copying, the requested documentary material in your possession, custody, or control on or before January 16, 2018 by delivering them to Jenny Wojewoda, Assistant Attorney General, Office of the Attorney General, One Ashburton Place, Boston, Massachusetts 02108. The materials provided to the Attorney General should be accompanied by an affidavit signed by You. The affidavit should state that the production is full and complete, and, to the extent that any documents are withheld from production under a claim of privilege, the affidavit should specify the nature of each document and the applicable legal privilege. The produced materials will be reviewed by Assistant Attorney General Jenny Wojewoda and such other employees, agents, and experts of the Office of the Attorney General as needed as part of this investigation.

ORAL TESTIMONY: You are hereby required to appear and offer testimony under oath at an examination that shall be conducted by one or more Assistant Attorneys General at the Office of the Attorney General, 100 Cambridge Street, 11th Floor, Boston, Massachusetts starting at 10 AM on January 30, 2018, or at another mutually agreeable time and/or location concerning the subject matter of this investigation, including, but not limited to, (a) the documentary materials demanded by this CID, (b) those documentary materials produced by You in response to that CID and (c) Your methods, acts, practices, training and results in the marketing and sale of opioids by Purdue Pharma L.P.

INSTRUCTIONS

1. The documents submitted in response to this CID shall include all relevant documents in Your possession, custody, or control, including but not limited to documents maintained or stored at Your offices, or at any other location(s) where You do business or maintain or store documents.

2. In each instance in which a document is produced in response to a request, the current edition should be produced together with all earlier editions, drafts, or predecessor documents during the relevant time period, even though the title of the earlier documents may differ from current versions.

3. To the extent that documents are found in file folders and other similar containers that have labels or other identifying information, the documents shall be produced with such file folder and label information intact.

4. The documents submitted in response to this CID shall be marked or organized in such a way as to identify the document request (by number) to which each document is responsive.

5. If You withhold any requested document under any claim of privilege, please provide a list identifying each document for which You are claiming privilege, the author(s) and recipient(s) of the document, the date of the document, the nature of the document, the subject matter of the document, and the nature and basis of the privilege.

6. If any document requested in this CID is no longer in Your possession or custody or subject to Your control, please identify the document by its author(s), recipients(s), date and subject matter, and state whether the document is lost, has been destroyed, or has been transferred to others (and, if the latter, identify the transferee(s)).

7. Please mark each page with an identifying "Bates" mark and number each page sequentially. The marks should not obscure any information on the document.

8. Unless otherwise specified, this CID applies to documents in effect, created, recorded, compiled, transmitted, and/or received at any time from January 3, 2006 to the present. This document request is continuing in nature so as to require supplementing documents if You obtain further responsive documents.

9. If You believe that the production of documents as required by this Civil Investigative Demand would be unduly burdensome, or if You require clarification of any request, please contact Assistance Attorney General Jenny Wojewoda within ten (10) days of receipt hereof.

DEFINITIONS

1. "Communication" means the transmittal of information (in the form of facts, opinions, ideas, inquiries, or otherwise).

2. "Concerning" means referring to, describing, offering evidence of, or constituting.

3. "Document(s)" is defined to be synonymous in meaning and equal in scope to the usage of this term in Mass. R. Civ. P. 34 (a). An earlier draft is a separate document within the meaning of this term.

4. "Purdue" means Purdue Pharma L.P. and all of its predecessors, successors, parent corporations, affiliates, subdivisions, subsidiaries, officers, directors, agents, servants and/or employees.

5. "You" means [redacted] and any of his attorneys or agents.

6. To the extent necessary to bring into the scope of the document requests any document that might otherwise be construed to be outside their scope (a) the word "or" means "and/or," (b) the word "and" means "and/or," (c) the word "all" means "any and all," (d) the word "any" means "any and all," (e) the word "each" means "each and every," (f) the word "every" means "each and every" and (g) the singular form of a word includes the plural form, and the plural includes the singular.

REQUESTS TO PRODUCE DOCUMENTS

Please produce the following:

1. All documents relating, directly or indirectly to the marketing, or promotion, of Purdue-branded opioids in Massachusetts, including, but not limited to, marketing materials, emails, customer target lists, clinical reprints, travel and entertainment budget and expense reports, budgets for and/or spending on marketing or educational events, sales training and compliance documents, documents relating to the allocation and distribution of samples and documents relating to or constituting correspondence or other communication to or from any person regarding such marketing or solicitation, however maintained.

2. All documents relating, directly or indirectly to any training received, performed or attended by you concerning, specifically or generally, the marketing, or promotion, of any Purdue-branded opioid.

3. All documents relating, directly or indirectly to your relationship with Purdue, including, but not limited to, any communications from Purdue relating to the marketing or promoting of Purdue-branded opioids, contracts or agreements with Purdue, documents relating

to compensation, performance, evaluations, employee manuals or sales manuals, ride-along reports, commendations, awards, complaints, and records of disciplinary action.

Dated: Boston, Massachusetts
December 8, 2017

COMMONWEALTH OF MASSACHUSETTS

MAURA HEALEY
ATTORNEY GENERAL

Jenny Wojewoda
Assistant Attorney General
Health Care and Fair Competition Bureau
One Ashburton Place
Boston, MA 02108
617-727-2200, ext. 2547

Exhibit 14

COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

CIVIL INVESTIGATIVE DEMAND
FOR DOCUMENTS AND TESTIMONY

CID-2017-HCD-19
Issued December 18, 2017

TO: [redacted]

YOU ARE HEREBY REQUIRED to (a) to produce and deliver documentary materials and (b) to appear and offer oral testimony under oath as described in this Civil Investigative Demand ("CID") to the Attorney General of the Commonwealth of Massachusetts in accordance with the Definitions and Instructions in this CID. The Attorney General has issued this CID pursuant to Massachusetts General Laws, Chapter 93A, Section 6, which authorizes the Attorney General to investigate possible unfair or deceptive methods, acts, or practices in violation of Chapter 93A, Section 2(a). This investigation relates to allegations of unfair or deceptive acts or practices in the marketing and sale of opioids by Purdue Pharma L.P. in Massachusetts in violation of Massachusetts General Laws Chapter 93A, Section 2(a), and other Massachusetts laws and regulations. This CID requires that You produce documents and offer oral testimony under oath pursuant to G.L. c. 93A, § 6(1).

The Attorney General has issued this CID as part of the Office of the Attorney General's oversight of the Massachusetts health care system as a "health oversight agency," as that term is defined and used in 45 C.F.R. §§ 164.501 and 164.512(d) of the federal Standards for Privacy of Individually Identifiable Health Information that implements the privacy requirements of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Providing the requested information is also a permitted disclosure under HIPAA because it is "required by law" pursuant to 45 C.F.R. § 164.512(a) and made "for law enforcement purposes," pursuant to 45 C.F.R. § 164.512(f), including that it complies with the HIPAA standard for disclosures to law enforcement officials set forth in 45 C.F.R. § 164.512(f)(1)(ii)(C), namely, that the information sought is relevant and material to a legitimate law enforcement inquiry, the request is specific and limited in scope to the extent reasonably practicable, and de-identified information cannot reasonably be used to complete the investigation.

DOCUMENTARY MATERIALS: You are hereby required to produce and deliver, for examination and copying, the requested documentary material in your possession, custody, or control on or before January 18, 2018 by delivering them to Michael W. Wong, Assistant Attorney General, Office of the Attorney General, Health Care Division, One Ashburton Place, Boston, Massachusetts 02108. The materials provided to the Attorney General should be accompanied by an affidavit signed by You. The affidavit should state that the production is full and complete, and, to the extent that any documents are withheld from production under a claim of privilege, the affidavit should specify the nature of each document and the applicable legal

privilege. The produced materials will be reviewed by Assistant Attorney Michael W. Wong and such other employees, agents, and experts of the Office of the Attorney General as needed as part of this investigation.

ORAL TESTIMONY: You are hereby required to appear and offer testimony under oath at an examination that shall be conducted by one or more Assistant Attorneys General at the Office of the Attorney General, 100 Cambridge Street, 10th Floor, Boston, Massachusetts starting at 9:30 AM on January 25, 2018, or at another mutually agreeable time and/or location concerning the subject matter of this investigation, including, but not limited to, (a) the documentary materials demanded by this CID, (b) those documentary materials produced by You in response to that CID and (c) Your methods, acts, practices, training and results in the marketing and sale of opioids by Purdue Pharma L.P.

INSTRUCTIONS

1. The documents submitted in response to this CID shall include all relevant documents in Your possession, custody, or control, including but not limited to documents maintained or stored at Your offices, or at any other location(s) where You do business or maintain or store documents.

2. In each instance in which a document is produced in response to a request, the current edition should be produced together with all earlier editions, drafts, or predecessor documents during the relevant time period, even though the title of the earlier documents may differ from current versions.

3. To the extent that documents are found in file folders and other similar containers that have labels or other identifying information, the documents shall be produced with such file folder and label information intact.

4. The documents submitted in response to this CID shall be marked or organized in such a way as to identify the document request (by number) to which each document is responsive.

5. Unless otherwise specified and agreed by the Office of the Attorney General, responsive documents maintained as electronic documents in the regular course of business must be produced as electronic documents. Documents maintained in hard copy may be produced in either electronic or hard copy format. To the extent hard copy and electronic documents are produced in electronic format, the Attorney General requests that all such documents be produced in electronic format suitable for loading into ONE Platform by Driven, Inc., including a text file and a load file containing all metadata. All Excel spreadsheets should be produced in native file format. See the attached AGO Data Delivery Specification for further technical specifications applicable to production of documents in electronic format.

6. If You withhold any requested document under any claim of privilege, please provide a list identifying each document for which You are claiming privilege, the author(s) and

recipient(s) of the document, the date of the document, the nature of the document, the subject matter of the document, and the nature and basis of the privilege.

7. If any document requested in this CID is no longer in Your possession or custody or subject to Your control, please identify the document by its author(s), recipients(s), date and subject matter, and state whether the document is lost, has been destroyed, or has been transferred to others (and, if the latter, identify the transferee(s)).

8. Please mark each page with an identifying "Bates" mark and number each page sequentially. The marks should not obscure any information on the document.

9. Unless otherwise specified, this CID applies to documents in effect, created, recorded, compiled, transmitted, and/or received at any time from 2007 to the present. This document request is continuing in nature so as to require supplementing documents if You obtain further responsive documents.

10. If You believe that the production of documents as required by this Civil Investigative Demand would be unduly burdensome, or if You require clarification of any request, please contact Assistance Attorney General Michael W. Wong within ten (10) days of receipt hereof.

DEFINITIONS

1. "Communication" means the transmittal of information (in the form of facts, opinions, ideas, inquiries, or otherwise).

2. "Concerning" means referring to, describing, offering evidence of, or constituting.

3. "Document(s)" is defined to be synonymous in meaning and equal in scope to the usage of this term in Mass. R. Civ. P. 34 (a). An earlier draft is a separate document within the meaning of this term.

4. "Purdue" means Purdue Pharma L.P. and all of its predecessors, successors, parent corporations, affiliates, subdivisions, subsidiaries, officers, directors, agents, servants and/or employees.

5. "You" means [redacted] and any of his attorneys or agents.

6. To the extent necessary to bring into the scope of the document requests any document that might otherwise be construed to be outside their scope (a) the word "or" means "and/or," (b) the word "and" means "and/or," (c) the word "all" means "any and all," (d) the word "any" means "any and all," (e) the word "each" means "each and every," (f) the word "every" means "each and every" and (g) the singular form of a word includes the plural form, and the plural includes the singular.

REQUESTS TO PRODUCE DOCUMENTS

Please produce the following:

1. All documents relating, directly or indirectly to the marketing, or promotion, of Purdue-branded opioids in Massachusetts, including, but not limited to, marketing materials, emails, customer target lists, clinical reprints, travel and entertainment budget and expense reports, budgets for and/or spending on marketing or educational events, sales training and compliance documents, documents relating to the allocation and distribution of samples and documents relating to or constituting correspondence or other communication to or from any person regarding such marketing or solicitation, however maintained.

2. All documents relating, directly or indirectly to any training received, performed or attended by you concerning, specifically or generally, the marketing, or promotion, of any Purdue-branded opioid.

3. All documents relating, directly or indirectly to your relationship with Purdue, including, but not limited to, any communications from Purdue relating to the marketing or promoting of Purdue-branded opioids, contracts or agreements with Purdue, documents relating to compensation, performance, evaluations, employee manuals or sales manuals, ride-along reports, commendations, awards, complaints, and records of disciplinary action.

Dated: Boston, Massachusetts
December 18, 2017

COMMONWEALTH OF MASSACHUSETTS

MAURA HEALEY
ATTORNEY GENERAL

Michael W. Wong
Assistant Attorney General
Health Care Division
Health Care and Fair Competition Bureau
One Ashburton Place
Boston, MA 02108
617-727-2200, ext. 2918

Exhibit 15

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL
ONE ASHBURTON PLACE
BOSTON, MASSACHUSETTS 02108

MAURA HEALEY
ATTORNEY GENERAL

(617) 727-2200
(617) 727-4765 TTY
www.mass.gov/ago

SECOND SUPPLEMENTAL CIVIL INVESTIGATIVE DEMAND

CID No. 2017-FCD-56
Date Issued: December 22, 2017

VIA EMAIL

TO: Purdue Pharma, L.P.
c/o Sarah G. Reznek
Morgan, Lewis & Bockius LLP
Morgan Lewis Consulting LLC
1111 Pennsylvania Avenue, NW
Washington, DC 20004-2541
sarah.reznek@morganlewis.com

YOU ARE HEREBY REQUIRED to produce Documentary materials as described in this Supplemental Civil Investigative Demand ("CID") to the Attorney General of the Commonwealth of Massachusetts in accordance with the Instructions and Definitions in this CID. The Attorney General has issued this CID pursuant to Massachusetts General Laws, Chapter 93A, Section 6, which authorizes the Attorney General to investigate possible unfair or deceptive methods, acts, or practices in violation of Chapter 93A, Section 2(a). This investigation relates to allegations of unfair or deceptive acts or practices in the marketing and sale of opioids in Massachusetts.

DOCUMENTARY MATERIALS: You are hereby required to produce and deliver, for examination and copying, the requested Documentary material in Your possession, custody, or control to Gillian Feiner, Assistant Attorney General, Office of the Attorney General, One Ashburton Place, Boston, Massachusetts 02108 on or before January 16, 2018. The materials provided to the Attorney General should be accompanied by an affidavit signed by the corporate officer responsible for the oversight of the document production. The affidavit should state that the production is full and complete, and, to the extent that any documents are withheld from production under a claim of privilege, the affidavit should specify the nature of each document and the applicable legal privilege. The produced materials will be reviewed by AAG Feiner and such other attorneys, employees, agents, and experts of the Office of the Attorney General as needed as part of this investigation.

The Attorney General has issued this CID as part of the Office of the Attorney General's oversight of the Massachusetts health care system as a "health oversight agency," as that term is defined and used in 45 C.F.R. §§ 164.501 and 164.512(d) of the federal Standards for Privacy of Individually Identifiable Health Information that implements the privacy requirements of the

Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Providing the requested information is also a permitted disclosure under HIPAA because it is "required by law" pursuant to 45 C.F.R. § 164.512(a) and made "for law enforcement purposes," pursuant to 45 C.F.R. § 164.512(f), including that it complies with the HIPAA standard for disclosures to law enforcement officials set forth in 45 C.F.R. § 164.512(f)(1)(ii)(C), namely, that the information sought is relevant and material to a legitimate law enforcement inquiry, the request is specific and limited in scope to the extent reasonably practicable, and de-identified information cannot reasonably be used to complete the investigation.

INSTRUCTIONS

1. The Documents submitted in response to this CID shall include all relevant Documents in Your possession, custody, or control, including but not limited to Documents maintained or stored at Your offices, or at any other location(s) where You do business or maintain or store Documents.

2. In each instance in which a Document is produced in response to a request, the current edition should be produced together with all earlier editions, drafts, or predecessor Documents during the relevant time period, even though the title of the earlier Documents may differ from current versions.

3. To the extent that Documents are found in file folders and other similar containers that have labels or other Identifying information, the Documents shall be produced with such file folder and label information intact.

4. The Documents submitted in response to this CID shall be marked or organized in such a way as to Identify the Document request (by number) to which each Document is responsive.

5. Unless otherwise specified and agreed by the Office of the Attorney General, responsive Documents maintained as electronic Documents in the regular course of business must be produced as electronic Documents. Documents maintained in hard copy may be produced in either electronic or hard copy format. To the extent hard copy and electronic Documents are produced in electronic format, the Attorney General requests that all such Documents be produced in electronic format in accordance with the attached Special Instructions for Electronically Produced or Stored Material (Appendix 1).

6. If You withhold any requested Document under any claim of privilege, please provide a list Identifying each Document for which You are claiming privilege, the author(s) and recipient(s) of the Document, the date of the Document, the nature of the Document, the subject matter of the Document, and the nature and basis of the privilege.

7. If any Document requested in this CID is no longer in Your possession or custody or subject to Your control, please Identify the Document by its author(s), recipients(s), date and subject matter, and state whether the Document is lost, has been destroyed, or has been transferred to others (and, if the latter, Identify the transferee(s)).

8. Please mark each page with an Identifying "Bates" mark and number each page

sequentially. The marks should not obscure any information on the Document.

9. Unless otherwise specified therein, this CID seeks information and Documents in effect, created, recorded, compiled, transmitted, and/or received, the **Relevant Time Period** for the Requests herein is **January 1, 2006 to the present.**

This request is continuing in nature so as to require supplementing Documents if You obtain further responsive Documents.

10. If You believe that the production of Documents as required by this Civil Investigative Demand would be unduly burdensome, or if You require clarification of any request, please contact Assistant Attorney General Feiner within ten (10) days of receipt hereof.

DEFINITIONS

1. "Butrans" means any medication containing the active ingredient buprenorphine that is Marketed by You in the United States.

2. "Call notes" means any document which contains a record of visits by your sales personnel to any health care provider, for the purpose of detailing opioids or disseminating information about opioids, pain, or the treatment of pain.

3. "CME" means continuing medical education as defined by the Accreditation Council for Continuing Medical Education or any state medical society.

4. "Communication" means the transmittal of information (in the form of facts, opinions, ideas, inquiries, or otherwise).

5. "Concerning" means referring to, describing, offering evidence of, or constituting.

6. "Customer" means any (a) HCP, (b) representatives of any State entity that purchases pharmaceutical products, including hospitals, long-term care facilities, or pharmacies, or (c) representatives of any State entity that make decisions concerning the payment for pharmaceutical products, including third party payors' pharmacy and therapeutics committees.

7. "Dilaudid" means any medication containing the active ingredient hydromorphone hydrochloride that is Marketed by You in the United States.

8. "Document(s)" is defined to be synonymous in meaning and equal in scope to the usage of this term in Mass. R. Civ. P. 34 (a). An earlier draft is a separate Document within the meaning of this term.

9. "Health care provider" and "HCP" means any physician, surgeon, nurse practitioner, physician assistant, physiatrist, psychiatrist, dentist, pharmacist, podiatrist, nurse, or other person engaged in the business of providing health care services and/or prescribing Opioids in the States, and any medical facility, hospital, or clinic, including but not limited to the current and former officers, directors, agents, representatives, or employees of any of the foregoing.

10. "Hysingla ER" means any medication containing the ingredient hydrocodone bitrate that is Marketed by You in the United States.

11. "Identify" when referring to a natural person means to state that person's full name and present or last known residence address, telephone number, business address, position and phone number.

12. "Identify" when referring to an entity means to give, the entity's full name, to the extent known, including (when not apparent from the name) the nature of the entity, e.g., corporation, limited liability corporation, partnership, or professional corporation, present or last known address of its headquarters or principal place of business, and the state in which the entity is incorporated or otherwise created.

13. "Identify" when referring to Documents means to give, to the extent known: (a) the type of Document; (b) the general subject matter; (c) the date of the Document; (d) the author or authors, according to the Document; and (e) the persons to whom, according to the Document, the Document (or a copy) was to have been sent.

14. "MS Contin" means any medication containing the active ingredient morphine sulfate that is Marketed by You in the United States.

15. "Opioids" or "Opioid" means all naturally occurring, synthetic, or semisynthetic substances that bind to Opioid receptors with opium-like qualities, including but not limited to, hydrocodone, hydromorphone, oxycodone, oxymorphone, fentanyl, methadone, buprenorphine, meperidine, morphine, opium, codeine and combination Opioid analgesics, immediate and extended release. These include medications Marketed as Oxycontin, Butrans, Dilaudid, Hysingla ER, MS Contin, Ryzolt and Targiniq ER.

16. "Oxycontin" means any medication containing the active ingredient oxycodone that is Marketed by You in the United States.

17. "Ryzolt" means any medication containing the active ingredient tramadol hydrochloride that is Marketed by You in the United States.

18. "Sales Representative" means any of Your employees or agents who, among their primary responsibilities, are to communicate directly, or supervise any employees or agents who communicate directly, with any Customers concerning Opioids.

19. "States" means Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Nebraska, Nevada, New York, North Carolina, North Dakota, Oregon, Pennsylvania, Rhode Island, South Dakota, Tennessee, Texas, Utah, Vermont, Virginia, West Virginia, Wisconsin, Wyoming, and the District of Columbia.

20. "Targiniq ER" means any medication containing the active ingredient oxycodone hydrochloride and naloxone hydrochloride that is Marketed by You in the United States.

21. "You," or "Your" or "Purdue" means Purdue Pharma L.P. and all of its predecessors, successors, parent corporations, affiliates, subdivisions, subsidiaries, officers, directors, agents, servants and/or employees.

22. To the extent necessary to bring into the scope of the Document requests any Document that might otherwise be construed to be outside their scope (a) the word "or" means "and/or," (b) the word "and" means "and/or," (c) the word "all" means "any and all," (d) the word "any" means "any and all," (e) the word "each" means "each and every," (f) the word "every" means "each and every" and (g) the singular form of a word includes the plural form, and the plural includes the singular.

REQUESTS FOR PRODUCTION

Please produce the following for the **Relevant Time Period**, unless otherwise specified. In lieu of providing Documents, You may provide a detailed written answer or spreadsheet, where appropriate and responsive.

73. Provide all documents concerning all meetings, conversations, or other communications between you and HCPs in each state during which opioid-containing products or opioids generally were discussed, including but not limited to any call notes, or other notes, reports, analyses, or documents concerning such visits or communications, to the extent not already requested and produced.

74. Documents sufficient to reflect the number of visits by your sales personnel to any HCP, for the purpose of detailing opioids or disseminating information about opioids, pain, or the treatment of pain, by state, to the extent not already requested and produced.

COMMONWEALTH OF MASSACHUSETTS

MAURA HEALEY
ATTORNEY GENERAL

Gillian Feiner /mfl

Gillian Feiner
Assistant Attorney General
False Claims Division
Office of the Attorney General
One Ashburton Place
Boston, MA 02108
617-963-2571
gillian.feiner@state.ma.us

Exhibit 16

COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

CIVIL INVESTIGATIVE DEMAND FOR DOCUMENTS AND TESTIMONY

CID-2018-FCD-07
Issued March 9, 2018

TO: [redacted]

YOU ARE HEREBY REQUIRED to (a) to produce and deliver documentary materials and (b) to appear and offer oral testimony under oath as described in this Civil Investigative Demand ("CID") to the Attorney General of the Commonwealth of Massachusetts in accordance with the Definitions and Instructions in this CID. The Attorney General has issued this CID pursuant to Massachusetts General Laws, Chapter 93A, Section 6, which authorizes the Attorney General to investigate possible unfair or deceptive methods, acts, or practices in violation of Chapter 93A, Section 2(a). This investigation relates to allegations of unfair or deceptive acts or practices in the marketing and sale of opioids by Purdue Pharma L.P. in Massachusetts in violation of Massachusetts General Laws Chapter 93A, Section 2(a), and other Massachusetts laws and regulations. This CID requires that You produce documents and offer oral testimony under oath pursuant to G.L. c. 93A, § 6(1).

The Attorney General has issued this CID as part of the Office of the Attorney General's oversight of the Massachusetts health care system as a "health oversight agency," as that term is defined and used in 45 C.F.R. §§ 164.501 and 164.512(d) of the federal Standards for Privacy of Individually Identifiable Health Information that implements the privacy requirements of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Providing the requested information is also a permitted disclosure under HIPAA because it is "required by law" pursuant to 45 C.F.R. § 164.512(a) and made "for law enforcement purposes," pursuant to 45 C.F.R. § 164.512(f), including that it complies with the HIPAA standard for disclosures to law enforcement officials set forth in 45 C.F.R. § 164.512(f)(1)(ii)(C), namely, that the information sought is relevant and material to a legitimate law enforcement inquiry, the request is specific and limited in scope to the extent reasonably practicable, and de-identified information cannot reasonably be used to complete the investigation.

DOCUMENTARY MATERIALS: You are hereby required to produce and deliver, for examination and copying, the requested documentary material in your possession, custody, or control on or before April 6, 2018 by delivering them to Jenny Wojewoda, Assistant Attorney General, Office of the Attorney General, One Ashburton Place, Boston, Massachusetts 02108. The materials provided to the Attorney General should be accompanied by an affidavit signed by You. The affidavit should state that the production is full and complete, and, to the extent that any documents are withheld from production under a claim of privilege, the affidavit should specify the nature of each document and the applicable legal privilege. The produced materials will be reviewed by Assistant Attorney General Jenny Wojewoda and such other employees, agents, and experts of the Office of the Attorney General as needed as part of this investigation.

ORAL TESTIMONY: You are hereby required to appear and offer testimony under oath at an examination that shall be conducted by one or more Assistant Attorneys General at the Office of the Attorney General, 100 Cambridge Street, 11th Floor, Boston, Massachusetts starting at 10 AM on April 13, 2018, or at another mutually agreeable time and/or location concerning the subject matter of this investigation, including, but not limited to, (a) the documentary materials demanded by this CID, (b) those documentary materials produced by You in response to that CID and (c) Your methods, acts, practices, training and results in the marketing and sale of opioids by Purdue Pharma L.P.

INSTRUCTIONS

1. The documents submitted in response to this CID shall include all relevant documents in Your possession, custody, or control, including but not limited to documents maintained or stored at Your offices, or at any other location(s) where You do business or maintain or store documents.

2. In each instance in which a document is produced in response to a request, the current edition should be produced together with all earlier editions, drafts, or predecessor documents during the relevant time period, even though the title of the earlier documents may differ from current versions.

3. To the extent that documents are found in file folders and other similar containers that have labels or other identifying information, the documents shall be produced with such file folder and label information intact.

4. The documents submitted in response to this CID shall be marked or organized in such a way as to identify the document request (by number) to which each document is responsive.

5. If You withhold any requested document under any claim of privilege, please provide a list identifying each document for which You are claiming privilege, the author(s) and recipient(s) of the document, the date of the document, the nature of the document, the subject matter of the document, and the nature and basis of the privilege.

6. If any document requested in this CID is no longer in Your possession or custody or subject to Your control, please identify the document by its author(s), recipients(s), date and subject matter, and state whether the document is lost, has been destroyed, or has been transferred to others (and, if the latter, identify the transferee(s)).

7. Please mark each page with an identifying "Bates" mark and number each page sequentially. The marks should not obscure any information on the document.

8. Unless otherwise specified, this CID applies to documents in effect, created, recorded, compiled, transmitted, and/or received at any time from January 1, 2008 to the present. This document request is continuing in nature so as to require supplementing documents if You obtain further responsive documents.

9. If You believe that the production of documents as required by this Civil Investigative Demand would be unduly burdensome, or if You require clarification of any request, please contact Assistance Attorney General Jenny Wojewoda within ten (10) days of receipt hereof.

DEFINITIONS

1. "Communication" means the transmittal of information (in the form of facts, opinions, ideas, inquiries, or otherwise).

2. "Concerning" means referring to, describing, offering evidence of, or constituting.

3. "Document(s)" is defined to be synonymous in meaning and equal in scope to the usage of this term in Mass. R. Civ. P. 34 (a). An earlier draft is a separate document within the meaning of this term.

4. "Purdue" means Purdue Pharma L.P. and all of its predecessors, successors, parent corporations, affiliates, subdivisions, subsidiaries, officers, directors, agents, servants and/or employees.

5. "You" means [redacted] and any of her attorneys or agents.

6. To the extent necessary to bring into the scope of the document requests any document that might otherwise be construed to be outside their scope (a) the word "or" means "and/or," (b) the word "and" means "and/or," (c) the word "all" means "any and all," (d) the word "any" means "any and all," (e) the word "each" means "each and every," (f) the word "every" means "each and every" and (g) the singular form of a word includes the plural form, and the plural includes the singular.

REQUESTS TO PRODUCE DOCUMENTS

Please produce the following:

1. All documents relating, directly or indirectly to the marketing, or promotion, of Purdue-branded opioids in Massachusetts, including, but not limited to, marketing materials, emails, customer target lists, clinical reprints, travel and entertainment budget and expense reports, budgets for and/or spending on marketing or educational events, sales training and compliance documents, documents relating to the allocation and distribution of samples and documents relating to or constituting correspondence or other communication to or from any person regarding such marketing or solicitation, however maintained.

2. All documents relating, directly or indirectly to any training received, performed or attended by you concerning, specifically or generally, the marketing, or promotion, of any Purdue-branded opioid.

3. All documents relating, directly or indirectly to your relationship with Purdue, including, but not limited to, any communications from Purdue relating to the marketing or promoting of Purdue-branded opioids, contracts or agreements with Purdue, documents relating

to compensation, performance, evaluations, employee manuals or sales manuals, ride-along reports, commendations, awards, complaints, and records of disciplinary action.

Dated: Boston, Massachusetts
March 9, 2018

COMMONWEALTH OF MASSACHUSETTS

MAURA HEALEY
ATTORNEY GENERAL

Jenny Wojewoda
Assistant Attorney General
Health Care and Fair Competition Bureau
One Ashburton Place
Boston, MA 02108
617-727-2200, ext. 2547

Exhibit 17

COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

CIVIL INVESTIGATIVE DEMAND FOR DOCUMENTS AND TESTIMONY

CID-2018-HCD-17
Issued March 20, 2018

TO: [redacted]

YOU ARE HEREBY REQUIRED to (a) to produce and deliver documentary materials and (b) to appear and offer oral testimony under oath as described in this Civil Investigative Demand ("CID") to the Attorney General of the Commonwealth of Massachusetts in accordance with the Definitions and Instructions in this CID. The Attorney General has issued this CID pursuant to Massachusetts General Laws, Chapter 93A, Section 6, which authorizes the Attorney General to investigate possible unfair or deceptive methods, acts, or practices in violation of Chapter 93A, Section 2(a). This investigation relates to allegations of unfair or deceptive acts or practices in the marketing and sale of opioids by Purdue Pharma L.P. in Massachusetts in violation of Massachusetts General Laws Chapter 93A, Section 2(a), and other Massachusetts laws and regulations. This CID requires that You produce documents and offer oral testimony under oath pursuant to G.L. c. 93A, § 6(1).

The Attorney General has issued this CID as part of the Office of the Attorney General's oversight of the Massachusetts health care system as a "health oversight agency," as that term is defined and used in 45 C.F.R. §§ 164.501 and 164.512(d) of the federal Standards for Privacy of Individually Identifiable Health Information that implements the privacy requirements of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Providing the requested information is also a permitted disclosure under HIPAA because it is "required by law" pursuant to 45 C.F.R. § 164.512(a) and made "for law enforcement purposes," pursuant to 45 C.F.R. § 164.512(f), including that it complies with the HIPAA standard for disclosures to law enforcement officials set forth in 45 C.F.R. § 164.512(f)(1)(ii)(C), namely, that the information sought is relevant and material to a legitimate law enforcement inquiry, the request is specific and limited in scope to the extent reasonably practicable, and de-identified information cannot reasonably be used to complete the investigation.

DOCUMENTARY MATERIALS: You are hereby required to produce and deliver, for examination and copying, the requested documentary material in your possession, custody, or control on or before April 20, 2018 by delivering them to Michael W. Wong, Assistant Attorney General, Office of the Attorney General, Health Care Division, One Ashburton Place, Boston, Massachusetts 02108. The materials provided to the Attorney General should be accompanied by an affidavit signed by You. The affidavit should state that the production is full and complete, and, to the extent that any documents are withheld from production under a claim of privilege, the affidavit should specify the nature of each document and the applicable legal

privilege. The produced materials will be reviewed by Assistant Attorney Michael W. Wong and such other employees, agents, and experts of the Office of the Attorney General as needed as part of this investigation.

ORAL TESTIMONY: You are hereby required to appear and offer testimony under oath at an examination that shall be conducted by one or more Assistant Attorneys General at the Office of the Attorney General, 100 Cambridge Street, 10th Floor, Boston, Massachusetts starting at 9:30 AM on April 27, 2018, or at another mutually agreeable time and/or location concerning the subject matter of this investigation, including, but not limited to, (a) the documentary materials demanded by this CID, (b) those documentary materials produced by You in response to that CID and (c) Your methods, acts, practices, training and results in the marketing and sale of opioids by Purdue Pharma L.P.

INSTRUCTIONS

1. The documents submitted in response to this CID shall include all relevant documents in Your possession, custody, or control, including but not limited to documents maintained or stored at Your offices, or at any other location(s) where You do business or maintain or store documents.

2. In each instance in which a document is produced in response to a request, the current edition should be produced together with all earlier editions, drafts, or predecessor documents during the relevant time period, even though the title of the earlier documents may differ from current versions.

3. To the extent that documents are found in file folders and other similar containers that have labels or other identifying information, the documents shall be produced with such file folder and label information intact.

4. The documents submitted in response to this CID shall be marked or organized in such a way as to identify the document request (by number) to which each document is responsive.

5. Unless otherwise specified and agreed by the Office of the Attorney General, responsive documents maintained as electronic documents in the regular course of business must be produced as electronic documents. Documents maintained in hard copy may be produced in either electronic or hard copy format. To the extent hard copy and electronic documents are produced in electronic format, the Attorney General requests that all such documents be produced in electronic format suitable for loading into ONE Platform by Driven, Inc., including a text file and a load file containing all metadata. All Excel spreadsheets should be produced in native file format. See the attached AGO Data Delivery Specification for further technical specifications applicable to production of documents in electronic format.

6. If You withhold any requested document under any claim of privilege, please provide a list identifying each document for which You are claiming privilege, the author(s) and

recipient(s) of the document, the date of the document, the nature of the document, the subject matter of the document, and the nature and basis of the privilege.

7. If any document requested in this CID is no longer in Your possession or custody or subject to Your control, please identify the document by its author(s), recipients(s), date and subject matter, and state whether the document is lost, has been destroyed, or has been transferred to others (and, if the latter, identify the transferee(s)).

8. Please mark each page with an identifying "Bates" mark and number each page sequentially. The marks should not obscure any information on the document.

9. Unless otherwise specified, this CID applies to documents in effect, created, recorded, compiled, transmitted, and/or received at any time from 2007 to the present. This document request is continuing in nature so as to require supplementing documents if You obtain further responsive documents.

10. If You believe that the production of documents as required by this Civil Investigative Demand would be unduly burdensome, or if You require clarification of any request, please contact Assistance Attorney General Michael W. Wong within ten (10) days of receipt hereof.

DEFINITIONS

1. "Communication" means the transmittal of information (in the form of facts, opinions, ideas, inquiries, or otherwise).

2. "Concerning" means referring to, describing, offering evidence of, or constituting.

3. "Document(s)" is defined to be synonymous in meaning and equal in scope to the usage of this term in Mass. R. Civ. P. 34 (a). An earlier draft is a separate document within the meaning of this term.

4. "Purdue" means Purdue Pharma L.P. and all of its predecessors, successors, parent corporations, affiliates, subdivisions, subsidiaries, officers, directors, agents, servants and/or employees.

5. "You" means [redacted] and any of his attorneys or agents.

6. To the extent necessary to bring into the scope of the document requests any document that might otherwise be construed to be outside their scope (a) the word "or" means "and/or," (b) the word "and" means "and/or," (c) the word "all" means "any and all," (d) the word "any" means "any and all," (e) the word "each" means "each and every," (f) the word "every" means "each and every" and (g) the singular form of a word includes the plural form, and the plural includes the singular.

REQUESTS TO PRODUCE DOCUMENTS

Please produce the following:

1. All documents relating, directly or indirectly to the marketing, or promotion, of Purdue-branded opioids in Massachusetts, including, but not limited to, marketing materials, emails, customer target lists, clinical reprints, travel and entertainment budget and expense reports, budgets for and/or spending on marketing or educational events, sales training and compliance documents, documents relating to the allocation and distribution of samples and documents relating to or constituting correspondence or other communication to or from any person regarding such marketing or solicitation, however maintained.

2. All documents relating, directly or indirectly to any training received, performed or attended by you concerning, specifically or generally, the marketing, or promotion, of any Purdue-branded opioid.

3. All documents relating, directly or indirectly to your relationship with Purdue, including, but not limited to, any communications from Purdue relating to the marketing or promoting of Purdue-branded opioids, contracts or agreements with Purdue, documents relating to compensation, performance, evaluations, employee manuals or sales manuals, ride-along reports, commendations, awards, complaints, and records of disciplinary action.

Dated: Boston, Massachusetts
March 19, 2018

COMMONWEALTH OF MASSACHUSETTS

MAURA HEALEY
ATTORNEY GENERAL

Michael W. Wong
Assistant Attorney General
Health Care Division
Health Care and Fair Competition Bureau
One Ashburton Place
Boston, MA 02108
617-727-2200, ext. 2918

Exhibit 18

COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

CIVIL INVESTIGATIVE DEMAND
FOR DOCUMENTS AND TESTIMONY

CID-2018-HCD-17
Issued March 26, 2018

TO: [redacted]

YOU ARE HEREBY REQUIRED to (a) to produce and deliver documentary materials and (b) to appear and offer oral testimony under oath as described in this Civil Investigative Demand ("CID") to the Attorney General of the Commonwealth of Massachusetts in accordance with the Definitions and Instructions in this CID. The Attorney General has issued this CID pursuant to Massachusetts General Laws, Chapter 93A, Section 6, which authorizes the Attorney General to investigate possible unfair or deceptive methods, acts, or practices in violation of Chapter 93A, Section 2(a). This investigation relates to allegations of unfair or deceptive acts or practices in the marketing and sale of opioids by Purdue Pharma L.P. in Massachusetts in violation of Massachusetts General Laws Chapter 93A, Section 2(a), and other Massachusetts laws and regulations. This CID requires that You produce documents and offer oral testimony under oath pursuant to G.L. c. 93A, § 6(1).

The Attorney General has issued this CID as part of the Office of the Attorney General's oversight of the Massachusetts health care system as a "health oversight agency," as that term is defined and used in 45 C.F.R. §§ 164.501 and 164.512(d) of the federal Standards for Privacy of Individually Identifiable Health Information that implements the privacy requirements of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Providing the requested information is also a permitted disclosure under HIPAA because it is "required by law" pursuant to 45 C.F.R. § 164.512(a) and made "for law enforcement purposes," pursuant to 45 C.F.R. § 164.512(f), including that it complies with the HIPAA standard for disclosures to law enforcement officials set forth in 45 C.F.R. § 164.512(f)(1)(ii)(C), namely, that the information sought is relevant and material to a legitimate law enforcement inquiry, the request is specific and limited in scope to the extent reasonably practicable, and de-identified information cannot reasonably be used to complete the investigation.

DOCUMENTARY MATERIALS: You are hereby required to produce and deliver, for examination and copying, the requested documentary material in your possession, custody, or control on or before April 18, 2018 by delivering them to Stephen B. Vogel, Assistant Attorney General, Health Care Division, Office of the Attorney General, One Ashburton Place, Boston, Massachusetts 02108. The materials provided to the Attorney General should be accompanied by an affidavit signed by You. The affidavit should state that the production is full and complete, and, to the extent that any documents are withheld from production under a claim of privilege, the affidavit should specify the nature of each document and the applicable legal privilege. The produced materials will be reviewed by Assistant Attorney General Vogel and

such other employees, agents, and experts of the Office of the Attorney General as needed as part of this investigation.

ORAL TESTIMONY: You are hereby required to appear and offer testimony under oath at an examination that shall be conducted by one or more Assistant Attorneys General at the Office of the Attorney General, 100 Cambridge Street, 10th Floor, Boston, Massachusetts starting at 10:00 AM on May 8, 2018, or at another mutually agreeable time and/or location concerning the subject matter of this investigation, including, but not limited to, (a) the documentary materials demanded by this CID, (b) those documentary materials produced by You in response to that CID, and (c) Your methods, acts, practices, training, and results in the marketing and sale of opioids by Purdue Pharma L.P.

INSTRUCTIONS

1. The documents submitted in response to this CID shall include all relevant documents in Your possession, custody, or control, including but not limited to documents maintained or stored at Your offices, or at any other location(s) where You do business or maintain or store documents.

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10. If You believe that the production of documents as required by this Civil Investigative Demand would be unduly burdensome, or if You require clarification of any request, please contact Assistance Attorney General Vogel within ten (10) days of receipt hereof.

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5. "You" means [redacted] and any of his attorneys or agents.

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reports, budgets for and/or spending on marketing or educational events, sales training and compliance documents, documents relating to the allocation and distribution of samples, and documents relating to or constituting correspondence or other communication to or from any person regarding such marketing or solicitation, however maintained.

2. All documents relating, directly or indirectly, to any training received, performed or attended by you concerning, specifically or generally, the marketing, or promotion, of any Purdue-branded opioid.

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Dated: Boston, Massachusetts
March 26, 2018

COMMONWEALTH OF MASSACHUSETTS

MAURA HEALEY
ATTORNEY GENERAL

Stephen B. Vogel
Assistant Attorney General
Health Care Division
Office of the Attorney General
One Ashburton Place
Boston, MA 02108
617-963-2415
stephen.vogel@state.ma.us

Exhibit 19

WIGGIN AND DANA
Counsellors at Law

Wiggin and Dana LLP
Two Stamford Plaza
281 Tresser Boulevard
Stamford, Connecticut
06901-3284
www.wiggin.com

Robert S. Hoff
203.363.7626
203.363.7676 fax
rhoff@wiggin.com

VIA FEDEX TO RICOH
AND EMAIL TO PLAINTIFF'S COUNSEL

September 28, 2018

RICOH USA, INC.
Attn: Evidence Intake
3100 South Gessner Road
Suite 520
Houston, TX 77063

Re: In re National Prescription Opiate Litigation, MDL No. 2804 and the "Track One" cases: The County of Summit, Ohio. v. Purdue Pharma L.P., Case No. 18-OP-45090 (N.D. Ohio); The County of Cuyahoga v. Purdue Pharma L.P., Case No. 17-OP-45004 (N.D. Ohio); and City of Cleveland v. AmerisourceBergen Drug Corp., Case No. 18-OP-45132 (N.D. Ohio).

Dear Counsel,

On behalf of Defendants Purdue Pharma L.P., Purdue Pharma Inc. and The Purdue Frederick Company Inc. (together, "Purdue"), we are producing a secure hard drive containing the following categories of documents:

- Documents from custodian Stephen Seid Bates-stamped PPLPC008000000001 through PPLPC008000067623.
- Documents from custodian Sally Riddle Bates-stamped PPLPC009000000001 through PPLPC009000136595.
- Documents from custodian Michelle Ringler Bates-stamped PPLPC010000000001 through PPLPC010000093554.
- Documents from custodian Gail Cawkwell Bates-stamped PPLPC011000000001 through PPLPC011000160638.
- Documents from custodian Russ Gasdia Bates-stamped PPLPC012000000001 through PPLPC012000511456.

Custodial file documents have been de-duplicated pursuant to Section 5 of the ESI order. Accordingly, while we have identified the custodian whose documents primarily make up each

Bates-range of Purdue's custodial productions, Purdue custodial productions consist of documents that relate to multiple custodians. To facilitate identification, we are including in this production a text overlay file that contains a field to identify each agreed upon custodian who was a sender or recipient of a custodial document. My understanding is that your vendor should load that text overlay file after loading the enclosed custodial productions.

Purdue's production is without waiver of any objection, including those in Purdue's discovery responses concerning the scope of discovery. In addition, this letter and the enclosed materials are not intended to, and do not, waive any applicable privilege. Purdue's production of any material subject to any applicable privilege is inadvertent. If we learn that any information produced is subject to a claim of privilege, we reserve the right to notify you of the basis for the claim of privilege and to recover such information.

Please do not hesitate to contact me if you have any questions about this production.

Sincerely,

/s/ Robert S. Hoff

Robert S. Hoff

Enclosure

cc: *All via email*
Mark S. Cheffo
David Ackerman
Paul Farrell
Paul J. Hanly
Joe Rice
Troy Rafferty
Steve Skikos
Pete Weinberger
Donald A. Ecklund
mdl2804discovery@motleyrice.com