

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT  
CIVIL ACTION NO.  
1884-cv-01808 (BLS2)

COMMONWEALTH OF MASSACHUSETTS,

Plaintiff,

v.

PURDUE PHARMA L.P., PURDUE PHARMA INC.,  
RICHARD SACKLER, THERESA SACKLER,  
KATHE SACKLER, JONATHAN SACKLER,  
MORTIMER D.A. SACKLER, BEVERLY SACKLER,  
DAVID SACKLER, ILENE SACKLER LEFCOURT,  
PETER BOER, PAULO COSTA, CECIL PICKETT,  
RALPH SNYDERMAN, JUDITH LEWENT, CRAIG  
LANDAU, JOHN STEWART, MARK TIMNEY,  
and RUSSELL J. GASDIA

Defendants

**AFFIDAVIT OF GILLIAN FEINER**

I, Gillian Feiner, hereby depose and state as follows:

1. On March 25, 2015, the Commonwealth issued to Purdue Pharma L.P. a civil investigative demand (“CID”) containing requests numbered 1-23. A true and correct copy thereof is attached as Exhibit 1.
2. On August 8, 2017, the Commonwealth issued to Purdue Pharma L.P. a second CID containing requests numbered 24-34. A true and correct copy thereof is attached as Exhibit 2.
3. On September 18, 2017, the Commonwealth issued to Purdue Pharma L.P. a third CID containing requests numbered 35-72. A true and correct copy thereof is attached as

Exhibit 3.

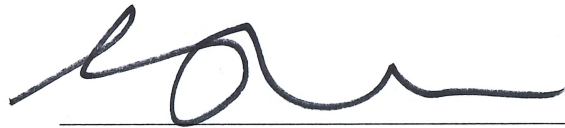
4. On October 27, 2017, the Commonwealth issued a CID to a former Purdue employee. A true and correct copy thereof is attached as Exhibit 4, with the individual's name and address redacted.
5. On October 30, 2017, the Commonwealth issued a CID to another former Purdue employee. A true and correct copy thereof is attached as Exhibit 5, with the individual's name and address redacted.
6. On November 10, 2017, the Commonwealth issued a CID to another former Purdue employee. A true and correct copy thereof is attached as Exhibit 6, with the individual's name and address redacted.
7. On November 13, 2017, the Commonwealth issued CIDs to two Purdue consultants. True and correct copies thereof are attached as Exhibit 7 and Exhibit 8, with the individuals' names and addresses redacted.
8. On November 14, 2017, the Commonwealth issued a CID to another former Purdue employee. A true and correct copy thereof is attached as Exhibit 9, with the individual's name and address redacted. The Commonwealth issued CIDs to this individual again on December 4, 2017, and February 14, 2018.
9. On November 21, 2017, the Commonwealth issued a CID to another former Purdue employee. A true and correct copy thereof is attached as Exhibit 10, with the individual's name and address redacted.
10. On December 1, 2017, the Commonwealth issued a CID to another former Purdue employee. A true and correct copy thereof is attached as Exhibit 11, with the individual's name and address redacted.

11. On December 8, 2017, the Commonwealth issued CIDs to two more former Purdue employees. True and correct copies thereof are attached as Exhibit 12 and Exhibit 13, with the individuals' names and addresses redacted.
12. On December 18, 2017, the Commonwealth issued a CID to another former Purdue employee. A true and correct copy thereof is attached as Exhibit 14, with the individual's name and address redacted.
13. On December 22, 2017, the Commonwealth issued to Purdue Pharma L.P. a fourth CID containing requests numbered 73-74. A true and correct copy thereof is attached as Exhibit 15.
14. On March 9, 2018, the Commonwealth issued a CID to another former Purdue employee. A true and correct copy thereof is attached as Exhibit 16, with the individual's name and address redacted.
15. On March 20, 2018, the Commonwealth issued a CID to another former Purdue employee. A true and correct copy thereof is attached as Exhibit 17, with the individual's name and address redacted.
16. On March 26, 2018, the Commonwealth issued a CID to another former Purdue employee. A true and correct copy thereof is attached as Exhibit 18, with the individual's name and address redacted.
17. On June 12, 2018, the Commonwealth filed its initial complaint in this matter.
18. The documents Purdue produced in response to the Commonwealth's CIDs did not include defendant Russell Gasdia's custodial files.
19. After filing its initial complaint, the Commonwealth began to receive documents Purdue produced in the multidistrict litigation *In re National Prescription Opiate Litigation*, Case

No. 17-MD-2804 (N.D. Ohio), including custodial files associated with Mr. Gasdia. On or about September 28, 2018, Purdue produced approximately half a million pages of documents from Mr. Gasdia's custodial file. A true and correct copy of the cover letter concerning production of Mr. Gasdia's custodial file is attached hereto as Exhibit 19.

20. On November 28, 2018, the Commonwealth notified Mr. Gasdia of its intention to add him as a defendant in this suit. *See* First Amended Complaint ¶ 894.

Signed and sworn to under the pains and penalties of perjury, this 10th day of May 2019.

A handwritten signature in black ink, appearing to read 'Gillian Feiner', written over a horizontal line.

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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