

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

Governmental Opioid Claimant Proof of Claim Form

You may file your claim electronically at PurduePharmaClaims.com via the link entitled "Submit a Claim."

For questions regarding this Proof of Claim Form, please call Prime Clerk at (844) 217-0912 or visit PurduePharmaClaims.com.

Read the instructions at the end of this document before filling out this form. This form is for governmental units and Native American Tribes to assert a general unsecured claim against the Debtors based on or involving opioids or their production, marketing and sale, including without limitation, the Debtors' production, marketing and sale of Purdue Opioids.

Do not use this form to assert any other pre-petition claims, including secured claims or claims entitled to priority under 11 U.S.C. § 507(a). Secured claims, claims entitled to priority under 11 U.S.C. § 507(a) and non-opioid related claims should be filed on a Non-Opioid Claimant Proof of Claim (Form 410).

Creditor (also referred to as "You" throughout) shall provide information responsive to the questions set forth below. Instructions and Definitions are provided at the end of this document. You shall provide information reasonably available to You and are not excused from providing the requested information for failure to appropriately investigate Your claim. Creditor shall supplement its responses if it learns that they are incomplete or incorrect in any material respect.

For Part 3, governmental units that have filed litigation against the Debtor(s) that is part of the federal multidistrict litigation in Ohio, *In re National Opiate Litigation*, MDL No. 17-02804 (N.D. Ohio 2017) ("Ohio MDL"), and have submitted a Government Plaintiff Fact Sheet in connection with that proceeding, may rely on their Government Plaintiff Fact Sheet to complete the questions in Part 3. For the avoidance of doubt, only governmental units who have filed litigation that is part of the Ohio MDL, and not governmental units that are part of the negotiation class in the Ohio MDL but have not otherwise filed litigation that is part of the MDL, may rely on their Government Plaintiff Fact Sheet to complete the questions in Part 3.

You must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, including the supporting documentation requested herein. **Do not send original documents** as they will not be returned, and they may be destroyed after scanning.

Fill in all the information about the claim as of September 15, 2019, the Petition Date. You may also fill in information regarding any claims You believe You may have after September 15, 2019 on this form. This form should be completed to the best of Your ability with the information available to You. If You are unable to answer certain questions at this time, the absence of an answer, by itself, will not result in the denial of Your claim, though You may be asked or required to provide additional information at a later date. You may also amend or supplement Your claim after it is filed.

Part 1: Identify the Claim

1. Who is the current creditor?	The States, Territories, and other jurisdictions listed on Schedule 1 (collectively, the "Claimants"). Name of the entity to be paid for this claim. Other names the creditor used with the Debtor(s): _____	
2. Has this claim been acquired from someone else or some other entity?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? See question 6. Name _____ Number _____ Street _____ City _____ State _____ ZIP Code _____ Contact phone _____ Contact email _____	Where should payments to the creditor be sent? (if different) Name _____ Number _____ Street _____ City _____ State _____ ZIP Code _____ Contact phone _____ Contact email _____

4. Does this claim amend one already filed? ☒ No. ☐ Yes. Claim number on court claims registry (if known) _____ Filed on MM / DD / YYYY
5. Do You know if anyone else has filed a proof of claim for this claim? ☒ No. ☐ Yes. Who made the earlier filing? _____

Part 2: Attorney Information (Optional)

6. Are you represented by an attorney in this matter? ☐ No. ☒ Yes. If yes, please provide the following information:
- You do not need an attorney to file this form.
- | | |
|--|---|
| <p>The Hon. Melanie Cyganowski (Ret.)
Counsel to the Ad Hoc Committee of
Governmental and Other Contingent Litigation Claimants
Otterbourg P.C.
230 Park Avenue
New York, New York 10169
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New York, New York 10019
(212) 858-1660
andrew.troop@pillsburylaw.com</p> |
|--|---|
- See Schedule 10 for each Claimant's respective attorney(s) in this matter.

Part 3: Information as of September 15, 2019, the Petition Date, About Your Claim

7. When do You allege you were first injured as a result of the Debtors' alleged conduct? 05 / 1987
Month Year
- ☐ If You believe that this question has been answered in the Government Plaintiff Fact Sheet submitted in the Ohio MDL, *In re National Opiate Litigation*, MDL No. 17-02804 (N.D. Ohio 2017) ("Ohio MDL"), and You wish to rely on Your statements made in the Government Plaintiff Fact Sheet to answer this question, check this box.
- ☐ If You believe that this question has been answered in a complaint that you have filed against the Debtor(s), and You wish to rely on Your statements made in that complaint to answer this question, check this box.
8. How much is the claim? \$ \$2.156 trillion (unliquidated); see Attachment; or
- ☐ If You believe that this question has been answered in the Government Plaintiff Fact Sheet submitted in the Ohio MDL, and You wish to rely on Your statements made in the Government Plaintiff Fact Sheet to answer this question, check this box.
- ☐ If You believe that this question has been answered in a complaint that you have filed against the Debtor(s), and You wish to rely on Your statements made in that complaint to answer this question, check this box.
- ☐ Unknown.
9. Describe the citizens and entities that You represent in this claim:
- The States, Territories, and other jurisdictions, and the citizens, residents and governmental entities of the States, Territories, and other jurisdictions, listed on Schedule 1.
- ☐ If You believe that this question has been answered in the Government Plaintiff Fact Sheet submitted in the Ohio MDL, and You wish to rely on Your statements made in the Government Plaintiff Fact Sheet to answer this question, check this box.
- ☐ If You believe that this question has been answered in a complaint that you have filed against the Debtor(s), and You wish to rely on Your statements made in that complaint to answer this question, check this box.

<p>10. Describe the conduct of the Debtors You allege resulted in injury or damages to You.</p>	<p>See the Attachment, schedule 10, and the complaints filed by the Claimants against the Debtors (which are also referenced in schedule 10).</p>
<p>Attach additional sheets if necessary.</p>	<p><input type="checkbox"/> If You believe that this question has been answered in the Government Plaintiff Fact Sheet submitted in the Ohio MDL, and You wish to rely on Your statements made in the Government Plaintiff Fact Sheet to answer this question, check this box.</p> <p><input type="checkbox"/> If You believe that this question has been answered in a complaint that you have filed against the Debtor(s), and You wish to rely on Your statements made in that complaint to answer this question, check this box.</p>
<p>11. Describe all alleged causes of action, sources of damages, legal theories of recovery, etc. that You are asserting against the Debtors.</p>	<p>See the Attachment, schedule 10, and the complaints filed by the Claimants against the Debtors (which are also referenced in schedule 10). For the avoidance of doubt, the complaints should be referenced for the claims, legal theories, and causes of action of each Claimant (to the extent not otherwise included in the Attachment), and damage amounts included in the complaints supplement (but do not supersede) the amount set forth above or in the Attachment.</p>
<p>Attach additional sheets if necessary.</p>	<p><input type="checkbox"/> If You believe that this question has been answered in the Government Plaintiff Fact Sheet submitted in the Ohio MDL, and You wish to rely on Your statements made in the Government Plaintiff Fact Sheet to answer this question, check this box.</p> <p><input type="checkbox"/> If You believe that this question has been answered in a complaint that you have filed against the Debtor(s), and You wish to rely on Your statements made in that complaint to answer this question, check this box.</p>
<p>12. Based on information reasonably available to You, please identify each category of damages or monetary relief that You allege, and include the amount of damages you assert for each category, if known.</p>	<p>See Attachment, schedule 10, and the complaints filed by the Claimants against the Debtors (which are also referenced in schedule 10). For the avoidance of doubt, the complaints should be referenced for the claims, legal theories, and causes of action of each Claimant (to the extent not otherwise included in the Attachment), and damage amounts included in the complaints supplement (but do not supersede) the amount set forth above or in the Attachment. Further, the amount set forth above (and in the Attachment) does not include claims for penalties, forfeitures, or other penal remedies and other civil or compensatory relief to which the Claimants may be entitled, including, but not limited to, civil penalties, disgorgement, restitution, attorneys fees and costs, investigation costs, or costs of programmatic equitable relief, all of which are asserted by each Claimant in their maximum allowable amount. This claim also asserts claims of all other creditors to which the Claimants are, by statute or common law, subrogated regardless of whether they later become allowed claims. The amount of these claims is not included here and can only be set once the claims are allowed.</p>
<p>Attach additional sheets if necessary.</p>	<p><input type="checkbox"/> If You believe that this question has been answered in the Government Plaintiff Fact Sheet submitted in the Ohio MDL, and You wish to rely on Your statements made in the Government Plaintiff Fact Sheet to answer this question, check this box.</p> <p><input type="checkbox"/> If You believe that this question has been answered in a complaint that you have filed against the Debtor(s), and You wish to rely on Your statements made in that complaint to answer this question, check this box.</p>

13. Based on information reasonably available to You, provide the total number of opioid-related overdose deaths of Your residents each year for the later of (i) 2008, or (ii) the date on which the period for which You are seeking damages begins.	Year	Total number of opioid related overdose deaths, if available
	See schedule 13.	Schedule 13 includes data for the total number of opioid-related
		overdose deaths from 1999 through 2018. The Claimants reserve
		the right to amend or supplement the data in schedule 13,
		including by adding data for 1987 through 1998.
	<input type="checkbox"/> If You believe that this question has been answered in the Government Plaintiff Fact Sheet submitted in the Ohio MDL, and You wish to rely on Your statements made in the Government Plaintiff Fact Sheet to answer this question, check this box.	
	<input type="checkbox"/> If You believe that this question has been answered in a complaint that you have filed against the Debtor(s), and You wish to rely on Your statements made in that complaint to answer this question, check this box.	

Part 4: Supporting Documentation

14. Please provide the following supporting documentation if you would like (but You are not required) to supplement this proof of claim.	<input type="checkbox"/> Provide any documents supporting Your claim, including but not limited to: any Plaintiff Fact Sheets and accompanying documents submitted in the MDL proceeding in the Northern District of Ohio; any complaint, petition, information, or similar pleading filed in any civil or criminal proceeding involving the Debtors; and any records supporting Your claim for damages.
	<input type="checkbox"/> In lieu of uploading or resubmitting the Government Plaintiff Fact Sheet that was submitted in the Ohio MDL, the creditor authorizes the Debtors to make the Government Plaintiff Fact Sheet, submitted on _____ in the Ohio MDL, available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order to be submitted for entry by the Court for use in connection with this proof of claim and these chapter 11 cases.
	<input checked="" type="checkbox"/> In lieu of uploading or submitting the complaint filed against the Debtor(s), the creditors authorize the Debtors to make the complaints set forth on the schedules accompanying this claim available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order to be submitted for entry by the Court for use in connection with this proof of claim and these chapter 11 cases.

Part 5: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☐ I am the creditor.
☒ I am the creditor's attorney or authorized agent.
☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

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

Executed on date 07/30/2020 (mm/dd/yyyy)

Signature

Signature

Print the name of the person who is completing and signing this claim:

Names The Hon. Melanie Cyganowski (Ret.)

Andrew M. Troop

Titles Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

Counsel to the Ad Hoc Group of Non-Consenting States

Companies Otterbourg P.C.

Pillsbury Winthrop Shaw Pittman LLP

Addresses 230 Park Avenue New York, New York 10169

31 W. 52nd Street New York, New York 10019

The signatures of the representatives of the governmental entities filing this claim are set forth on the page for the respective governmental entity in Schedule 10. The reasonable belief representation for each signatory in Schedule 10 applies only to the information relating to the aggregate claim and to the jurisdiction the governmental entity represents in filing this claim.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., et al.,¹

Debtors.

)
) Chapter 11
)

) Case No. 19-23649 (RDD)
)

) (Jointly Administered)
)

**ATTACHMENT TO CONSOLIDATED PROOF OF CLAIM OF
STATES, TERRITORIES AND OTHER GOVERNMENTAL ENTITIES**

I. INTRODUCTION

1. This Attachment, the preceding Governmental Opioid Proof of Claim form and all associated schedules are an integral part of, and an integrated set of documents, constituting the proof of claim being filed by the States, Territories and other governmental entities identified on Schedule 1 (collectively, the “Claimants”) in these cases. All these documents collectively constitute the proof(s) of claim for the Claimants and are sometimes referred to collectively as the “Consolidated Claim” or the “Proof of Claim.” Definitions, reservations, descriptions, authorizations or statements in any one document or schedule apply to all documents and schedules.

2. The Claimants’ claims are unliquidated and are asserted in an estimated amount of \$2.156 trillion as described on the Consolidated Claim Information Sheet, plus the amount of the

¹ The debtors in these chapter 11 cases (the “Debtors” or “Purdue”), along with the last four digits of their federal tax identification numbers, are Purdue Pharma Manufacturing L.P. (3821), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies K.P. (1868), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (6166), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717), and SVC Pharma Inc. (4014). The Debtors’ principal offices are at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

unliquidated claims of a Claimant's political subdivisions and residents in those jurisdictions in which such claims may be asserted by each Claimant (the "Claim Amount").²

II. RELEVANT BACKGROUND AS TO THE CONSOLIDATED CLAIM³

A. Purdue's Businesses

3. The Debtors are drug companies founded and owned by members of the Sackler family. The Debtors make up only a part of the entities owned by members of the Sackler family, including other drug companies that have contributed to the world-wide opioid crisis.

4. Purdue Pharma Inc., a New York corporation, is the general partner of Purdue Pharma L.P. Until 2018, members of the Sackler family held a majority of the seats on Purdue Pharma Inc.'s board of directors (the "Board"). The Sackler family members have now resigned from the Board in the face of an ever-increasing number of lawsuits suing them individually, but only after handpicking their replacements.

B. Purdue's Manufacturing and Aggressive Marketing of OxyContin

5. Since the 1980s, Purdue's primary business has been the manufacture, promotion, and distribution of opioids nationwide.⁴ During that time, Purdue engaged in deceptive practices that caused a national tragedy. Indeed, without evidence or support (and contrary to known facts), Purdue marketed, promoted, and mischaracterized OxyContin as "less addictive, less subject to abuse and diversion, and less likely to cause tolerance and withdrawal than other pain

² The Claim Amount does not include unliquidated amounts based on each Claimant's Additional Theories (defined below).

³ The facts set forth herein are upon information and belief and based upon publicly available information, including the allegations set forth in the States' lawsuits against Purdue. Copies of the States' complaints against Purdue are available at <https://www.mass.gov/lists/state-lawsuits-against-purdue-pharma>.

⁴ In or around May 1987, Purdue began to market and sell MS Contin, a continuous release formulation of the opioid, morphine sulphate. And, in or around December 1994, Purdue submitted a New Drug Application (the "NDA") for OxyContin to the U.S. Food & Drug Administration (the "FDA"). See Agreed Statement of Facts, at ¶ 13 (The Agreed Statement of Facts was entered in *United States v. Purdue Frederick Co.*, No. 07CR00029 (W.D. Va.), as part of the settlement with the U.S. government (the "Plea Agreement") and is available at <https://www.documentcloud.org/documents/279028-purdue-guilty-plea>.

medications.” *Agreed Statement of Facts* at ¶ 20. It made similar claims with respect to other opioids it marketed and sold across the United States. To broadcast this misstatement, Purdue employed a large staff of sales representatives, and issued false marketing materials, which misrepresented OxyContin’s benefits, and downplayed its risks, thereby encouraging the drug’s use for less acute, longer-lasting pain, including arthritis, back pain, sports injuries, and fibromyalgia. OxyContin became the best-selling opioid in the nation. It has been estimated that approximately 80% of heroin abusers started down the path of addiction and abuse through the use of prescription opioids.⁵

C. The 2007 Guilty Plea in Connection with the Release and Marketing of OxyContin

6. In 2007, the Purdue Frederick Company pleaded guilty to a felony charge and three of its executives pleaded guilty to misdemeanor charges for intentionally promoting false or misleading information about OxyContin.⁶

7. As part of the Plea Agreement, Purdue Pharma L.P. entered into a Corporate Integrity Agreement (the “CIA”), which, in relevant part, required the appointment of a compliance officer to serve as a member of Purdue’s senior management and make periodic compliance reports directly to Purdue’s Board. The Plea Agreement explicitly required the Board itself to comply with the rules prohibiting the misbranding of the company’s products, undergo training to ensure that the rules were understood, and report any subsequent violations.

8. In 2007, certain Purdue entities also entered into consent judgments (collectively, the “Consent Judgments”) with twenty-five States and the District of Columbia.⁷ As a part of

⁵ National Institute on Drug Abuse, “Prescription opioid use is a risk factor for heroin use National Institute on Drug Abuse” (2018), <https://www.drugabuse.gov/publications/research-reports/prescription-opioids-heroin/prescription-opioid-use-risk-factor-heroin-use> (last visited July 27, 2020).

⁶ Notwithstanding the guilty pleas, Purdue subsequently paid bonuses totaling \$8 million to two of the three executives. The company’s earlier wrongdoing is described in the *Agreed Statement of Facts*.

⁷ The 2007 Consent Judgments were with Arizona, Arkansas, California, Connecticut, the District of Columbia, Idaho, Illinois, Louisiana, Maine, Maryland, Massachusetts, Montana, Nebraska, Nevada, New Mexico, North

many of the Consent Judgments, Purdue Pharma, Inc., Purdue Pharma L.P., and the Purdue Frederick Company affirmatively agreed to cease false, deceptive, or misleading marketing. Certain of those judgments also required that Purdue monitor abuse and diversion information and, in some cases, report its findings to the authorities.

D. Post-2007 Conduct

9. Neither the CIA nor the Consent Judgments, however, deterred Purdue (or the Sacklers). Purdue not only continued its deceptive scheme to misrepresent OxyContin's addictive properties and dangers; it also worked shamelessly to increase the frequency, dosage, and time period for OxyContin prescriptions to achieve greater profits from branded and unbranded product.⁸ To be clear, Purdue's unlawful conduct continues to this day in the form of continued sales based on the deceptive and unfair marketing Purdue engaged in for over a decade.

10. The Centers for Disease Control and Prevention has declared opioid abuse to be a "public health epidemic." Between 1999 and 2016, more than 200,000 people in the United States died from overdoses directly related to prescription opioids, with recent estimates suggesting that more than 130 people in the United States die from opioid overdoses *every day*.⁹

11. Based on this conduct, Claimants have asserted and by this proof of claim are asserting claims against the Debtors for all claims, costs and damages based on or involving opioids or their production, marketing and sale, including without limitation, the Debtors' production, marketing and sale of Purdue opioids. They also assert, where authorized, the claims for damages incurred by their political subdivisions and residents for damages arising from this

Carolina, Ohio, Oregon, Pennsylvania, South Carolina, Tennessee, Texas, Vermont, Virginia, Washington, and Wisconsin.

⁸ Additional relevant facts are detailed in the complaints filed by the States, available at <https://www.mass.gov/lists/state-lawsuits-against-purdue-pharma>, and summarized below.

⁹ See <https://www.hhs.gov/opioids/about-the-epidemic/index.html> (last visited Jul. 15, 2020)

conduct. Finally, they assert entitlement to civil penalties, restitution, and disgorgement, as variously authorized by their laws.

12. The crux of the Claimants' claims is that the Debtors engaged in deceptive marketing and promotion aimed at increasing the market for all opioids generally and boosting sales of OxyContin and the Debtors' other opioid products in particular. This marketing and promotion effort had the effect of increasing opioid usage, addiction to all forms of opioids and deaths generally and the costs incurred and to be incurred by the States as a result. Without limiting the foregoing, the Claimants' claims include claims for violations of consumer protection laws, public nuisance, fraud, negligence, negligence *per se*, elder abuse, violations of racketeering and other statutes, lost revenue, past and future costs and expenses, unliquidated claims based on non-Medicaid population, abatement, fraudulent conveyances or transfers, taxes, fines, penalties, forfeitures, and other penal claims, statutory civil penalties, disgorgement, restitution, mandatory and prohibitory injunctive relief under their respective consumer protection laws, and violations or enforcement of police powers. This Consolidated Claim also asserts claims of all other creditors to which the States are by statute or common law subrogated or granted authorization to pursue regardless of whether they later become allowed claims. The amount of these claims is not included here and can only be set once they are otherwise allowed. Each of the foregoing theories for the Claimants' claims comprise the "Collective Theories."

13. For additional theories asserted by individual Claimants ("Additional Theories"), refer to each Claimant's respective supplement in Schedule 10 (collectively, the "Supplements"). For further details, refer to each Claimant's Supplement and the lawsuit(s) identified therein. The complaints filed in each Claimant's lawsuit(s) and all allegations and prayers for relief set forth in those complaints are incorporated into this Consolidated Claim as if fully set forth herein.

III. RESERVATION OF RIGHTS

14. This Proof of Claim is filed pursuant to the order entered by the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) in these chapter 11 cases establishing July 30, 2020 as the deadline for filing proofs of claim (the “Bar Date”). *See* Docket Nos. 800 and 1221. Nothing in this Proof of Claim shall constitute an express or implied waiver of the sovereignty of any governmental unit¹⁰ that may be a member of the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants, the Ad Hoc Group of Non-Consenting States, or any governmental unit that has authorized the filing of, and is deemed to have filed, a proof of claim through joining the Consolidated Claim.

15. Each Claimant reserves its rights to amend, modify, and/or supplement any of the claims set forth in this Proof of Claim, including its schedules or exhibits, at any time, including after the Bar Date, in any manner, including but not limited to: (i) supplement or amend this Proof of Claim or any related documents and other information, and to describe further the claims asserted herein; (ii) assert any and all additional amounts that are due, may be due, or will become due by any of the Debtors including, without limitation, amounts owed both before and after the date of the commencement of the Debtors’ bankruptcy cases that remain outstanding in an undetermined amount, or are otherwise unmatured, unliquidated and/or contingent as of the date hereof; and (iii) fix and liquidate the amount of unmatured, contingent, and unliquidated claims. Each Claimant expressly reserves the right to attach, produce, and/or rely upon additional documentation or other evidence that supports its claims, including any additional documents or other evidence that may become available after further investigation or discovery. Among other

¹⁰ As used in this Proof of claim, governmental unit has the meaning ascribed to it in 11 U.S.C. §101(27).

reasons, amendment may be required as Claimants continue to assess their losses caused by the Debtors.

16. Each Claimant expressly reserves all its defenses and rights, procedural and substantive, and shall not be deemed to have waived or released any claim by virtue of it not being liquidated or fixed on the Consolidated Claim Summary Information Sheet.

17. Each Claimant does not waive, and expressly reserves, any right of action that it has or may have against the Debtors, or any other entity or person. Any such claims may, without limitation, be the subject of other proofs of claim filed in these cases and the execution and filing of this Proof of Claim shall not limit or affect any other claim of any Claimant. Each Claimant expressly reserves the right to file other proofs of claim, notwithstanding the filing of this Proof of Claim.

18. Each Claimant preserves and does not waive any rights to seek additional amounts that are due, may be due, or will become due, including, without limitation, the rights: (i) to file additional proofs of claim at any time; and (ii) to file proofs of claim against third parties, including, without limitation, any entity or person. If the Bankruptcy Court enters an order, which effectively subordinates Claimants' claims, Claimants' rights to file additional proofs of claim or amended proofs of claim against the Debtors are reserved.

19. This Proof of Claim is submitted without prejudice and in addition to any other claims of each Claimant that have been listed in any of the Debtors' schedules or may become listed in any of the Debtors' schedules. In addition, each Claimant: (i) reserves the right to pursue claims (including but not limited to the claims described herein) against any of the Debtors based upon additional or alternative legal theories; (ii) reserves the right to file additional or other pleadings to assert any of the amounts set forth in this Proof of Claim or any amendments thereto;

and (iii) reserves the right to assert, if applicable, claims for post-petition administrative expenses pursuant to Bankruptcy Code sections 503 and 507. Nothing contained in this Proof of Claim shall limit the rights of any Claimant to file papers or pleadings, or commence any proceedings, or take any actions concerning its claims, liens or security interests.

20. Nothing in this Proof of Claim shall constitute a waiver or release of any rights, powers or remedies of any Claimant, including any rights: (i) against the Debtors; (ii) against any non-debtor affiliate or insider of the Debtors or person or entity associated with the Debtors or their affiliates or insiders; (iii) against any member of the Sackler family and any entity or person associated with a member of the Sackler family; (iv) against any other person, entity, or property, including but not limited to any entity that may have developed, designed, manufactured, marketed, promoted, stored, transported, disposed of, sold, supplied, and/or agreed to indemnify for losses related to, prescription opioid products, including but not limited to, all forms and versions of Purdue's morphine, oxycodone, hydrocodone, and buprenorphine products; (v) of setoff or recoupment; (vi) to contest the jurisdiction of the Bankruptcy Court with respect to the subject matter of the claim set forth herein, or any elements thereof, or any other proceedings commenced against or involving Claimant; (vii) to elect remedies or choice of law; (viii) to have final orders in non-core matters entered only after de novo review by a judge of the United States District Court; (ix) to trial by jury in any proceeding related to this proceeding; (x) to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (xi) to the subordination, in favor of Claimant, of claims or liens held by creditors of the Debtors; (xii) to arbitration or other alternative dispute resolution mechanism; (xiii) to have any unliquidated portion of any claim determined by an applicable court other than the Bankruptcy Court; (xiv) to have claims cured if contracts are assumed, or to have claims

reinstated, pursuant to the Bankruptcy Code, the Debtors' plan of reorganization and/or any other liquidation or reorganization by the Debtors; (xv) to seek the reconsideration under section 502(j) of the Bankruptcy Code of any disallowance of any amount claimed under this Proof of Claim, whether liquidated or unliquidated or contingent or noncontingent; and (xvi) to seek relief from the Bankruptcy Court, or any other applicable court, with respect to the allowance, priority, estimation, or other treatment of Claimant's claims under the Bankruptcy Code.

21. The filing of this Proof of Claim is not intended to be and shall not be construed as: (i) a concession or admission by any Claimant of liability or facts with respect to any claims or alleged damages (or the amount thereof) that have been or may be asserted against any Claimant by any party, including, and not limited to, third parties; (ii) a waiver of any past, present or future default or event of default; (iii) a consent by any Claimant to the treatment of any non-core claim against it as a core claim; (iv) a consent by any Claimant to a jury trial in the Bankruptcy Court in any proceeding as to any and all matters triable herein, or related to the same, whether or not such matters are designated as core proceedings; (v) a consent by any Claimant to the jurisdiction or venue of the Bankruptcy Court or any other court with respect to proceedings, if any, commenced in any case against or otherwise involving any Claimant; (vi) a waiver of sovereign immunity; and (vii) a consent to the final determination or adjudication of any claim or right pursuant to 28 U.S.C. § 157(c).

22. Subject to the limitations, descriptions, and reservations set forth herein, the Claimants agree to take their allocated share of the claims described in the Proof of Claim based on an agreement to be reached among them or as subsequently ordered by the Bankruptcy Court or other court of competent jurisdiction.

23. Successful objections to any one Claimant's claim will not impact any other Claimant's claims, which each Claimant is asserting in this Consolidated Claim individually.

Consolidated Claim Information Sheet

Cost of the Opioid Epidemic to the U.S. States & Territories Including Disbursement of Federal Funds (2020 USD billions)

		Total Historical Costs (2007-2019) [A]	Net Present Value of Future Abatement Costs (2020-2040)			Total Historical and Future Costs (2007-2040) [E]
			Continuation of Existing Programs [B]	New Abatement Programs [C]	Total Future Costs [D]	
Healthcare Costs						
Medicaid and State Employee*	[1]	\$249	\$301	\$266	\$568	\$816
OUD Treatment (Non-Medicaid)	[2]	\$64	\$118		\$118	\$182
OUD Prevention	[3]	\$5		\$248	\$248	\$253
NAS (Medicaid)*	[4]	\$7	\$15	\$11	\$27	\$34
Non-Healthcare Costs						
Criminal Justice*	[5]	\$97	\$104	\$27	\$131	\$229
Child Welfare	[6]	\$108	\$164		\$164	\$272
ACEs Programs*	[7]			\$78	\$78	\$78
Education	[8]	\$24	\$41		\$41	\$65
Income and Sales Tax	[9]	\$75	\$110		\$110	\$186
Other Abatement Strategies	[10]			\$42	\$42	\$42
Total Costs	[11]	\$630	\$854	\$672	\$1,526	\$2,156

Notes and Sources:

Calculations include the costs of the opioid epidemic borne by both states and the federal government (excluding costs borne by municipalities) unless otherwise noted. Table excludes costs borne by Kentucky prior to January 1, 2016 and Oklahoma. Categories marked with an asterisk (*) reflect known omissions and estimates have been increased to estimate omissions.

Consolidated Claim Information Sheet

Cost of the Opioid Epidemic to the U.S. States & Territories Including Disbursement of Federal Funds (2020 USD billions)

Columns [A]-[E]:

- [A]: Historical costs incurred as a result of the opioid epidemic over the period 2007 - 2019. Healthcare costs are reported in 2020 dollars using the Personal consumption expenditures: Services: Health care Index. Non-healthcare costs are reported in 2020 dollars using the GDP deflator. Inflation data are from the Federal Reserve Bank of St. Louis.
- [B]: Expected future costs over the period 2020-2040 as a result of the opioid epidemic based on a projection of the historical costs incurred. Future costs are discounted to 2020 at the average annual 10-year T-bill constant maturity rate over the period 1999-2019 (i.e., 3.54%). Future costs are based on the expected decline in the number of individuals with opioid use disorder ("OUD") based on the effectiveness of expected treatment and prevention programs. The historical OUD population for the period 2007-2017 are from the National Survey of Drug Use and Health ("NSDUH"). The future OUD population is projected using a Markov simulation model based on the framework developed by Pitt et al. (2018). See Pitt, Allison L., Keith Humphreys, and Margaret L. Brandeau. "Modeling health benefits and harms of public policy responses to the US opioid epidemic." *American Journal of Public Health* 108, no. 10 (2018): 1394-1400.
- [C]: Expected future costs over the period 2020-2040 for new abatement programs instituted to combat the opioid epidemic. (Appendix available for a full list of abatement programs included.) Future costs are discounted to 2020 at the average annual 10-year T-bill constant maturity rate over the period 1999-2019 (i.e., 3.54%). Healthcare costs and Criminal Justice costs are inflated at the average annual inflation rate in personal healthcare services over the period 1999-2019 (i.e., 2.36%). Other Abatement Strategies are inflated at the average annual growth rate in the GDP deflator over the period Q3 1999 - Q3 2019 (i.e., 1.96%). Costs are adjusted for differences across states based on the 2016 Medicaid Physician Fee Index for Healthcare and Criminal Justice costs and 2019 Wage Index (based on mean hourly wage from the U.S. Bureau of Labor Statistics) for Other Abatement Strategies. New abatement programs are based on the first-year costs of programs from the Ruhm Report that are not covered by the forecast of continuing existing programs in column [B]. Specifically, Addiction Treatment Services and NAS Treatment Services from the Ruhm Report are excluded as continuation of existing programs. Costs assume that all states and territories will implement all programs listed in Appendix. Sources of funding may include some federal sources to the extent that they are captured as costs to the State of Oklahoma in the Ruhm Report. See Ruhm, Christopher J. "Costs to the State of Oklahoma of Abating the Opioid Crisis." December 21, 2018 and supplemented February 5, 2019.
- [D]: [B] + [C].
- [E]: [A] + [D]. Categories with asterisk increased by 5% - 25% to reflect known omissions.

Consolidated Claim Information Sheet

Cost of the Opioid Epidemic to the U.S. States & Territories Including Disbursement of Federal Funds (2020 USD billions)

Rows [1]-[11]:

- [1]: Medicaid and State Employee costs include estimates of the excess healthcare costs associated with opioid use disorder (OUD) and opioid super users that are incurred by the state and federally-funded portions of Medicaid and state-funded health insurance for state employees. The OUD population is retrieved from NSDUH, which defines dependence or abuse of opioids (OUD) based on definitions found in the 4th edition of the Diagnostic and Statistical Manual of Mental Disorders (DSM-IV). Super users are defined as patients who do not have an OUD diagnosis but have opioid prescriptions covering at least 75% of the year. Super user prevalence is from Davenport et al. (2019a). Per patient excess OUD and super user costs are from Davenport et al. (2019b) and Florence (2016). State and federal funding for opioid-related substance use disorder treatment reported through SAMHSA is also included. Finally, costs also include opioid prescription costs funded through state worker's compensation programs as reported by documents directly provided by states. Davenport, Stoddard, Alexandra Weaver, and Matt Caverly. "Costs and comorbidities of opioid use disorder: The impact of opioid use disorder for patients with chronic medical conditions." Milliman White Paper (March 2019): 1-15 (Davenport et al., 2019a); Davenport, Stoddard, Alexandra Weaver, and Matt Caverly. "Economic Impact of Non-Medical Opioid Use in the United States, Annual Estimates and Projections for 2015 through 2019." Report prepared for the Society of Actuaries (October 2019): 1-93 (Davenport et al., 2019b); Florence, Curtis S., Chao Zhou, Feijun Luo, and Likang Xu. "The Economic Burden of Prescription Opioid Overdose, Abuse, and Dependence in the United States, 2013." *Medical Care* 54, no. 10 (2016): 901-906.
- [2]: OUD Treatment Costs are calculated by estimating the share of Substance Use Disorder ("SUD") treatment expenditures funded by state and local mental health and substance use disorder agencies and federal funds other than Medicaid, such as grant programs administered by the Substance Abuse and Mental Health Services Administration ("SAMHSA"), that are attributable to opioid abuse. SUD treatment costs are obtained from SAMHSA's Behavioral Health Spending and Use Accounts. The opioid-attributable share of spending is calculated using the share of non-Medicaid admissions to substance abuse treatment facilities that are due to the abuse of opioids, which is obtained by SAMHSA's Treatment Episode Dataset ("TEDS"). *Substance Abuse and Mental Health Services Administration. Behavioral Health Spending & Use Accounts 2006—2015. HHS Pub. No. (SMA) 19-5095. Rockville, MD: Substance Abuse and Mental Health Services Administration; 2019. Substance Abuse and Mental Health Services Administration, Treatment Episode Data Set (TEDS): 2000—2017. Rockville, MD: Substance Abuse and Mental Health Services Administration, 2019.*
- [3]: Historical Prevention costs include federal and state spending estimated from documents provided by states and territories. Expected future OUD Prevention costs are captured under column [C] since many of the programs are anticipated to increase or scale up. (Please see the Appendix for the list of prevention programs included in expected future costs.)
- [4]: Historical NAS costs include the healthcare cost attributable to the opioid epidemic of treating babies born with Neonatal Abstinence Syndrome ("NAS") for the first two years of life. Estimates represent Medicaid costs. Data on the incidence of NAS are from the Healthcare Cost and Utilization Projection ("HCUP"). The cost of treating NAS is from Strahan et al. (2020) adjusted for excess costs incurred after birth for the first two years of life. New Abatement programs include training of medical professionals, and screening and counselling for pregnant women. Strahan, Andrea E., Gery P. Guy, Michele Bohm, Meghan Frey, and Jean Y. Ko. "Neonatal Abstinence Syndrome Incidence and Health Care Costs in the United States, 2016." *JAMA Pediatrics* 174, no. 2 (2020): 200-202.
- [5]: Historical Criminal Justice costs include the cost of policing, the judiciary, and incarceration that are attributable to the opioid epidemic. Total Criminal Justice costs are sourced from the Bureau of Justice Statistics ("BJS") and apportioned to opioids using data from the FBI Uniform Crime Report ("FBI UCR"), BJS (Bronson et al., 2017), the National Forensic Laboratory Information System ("NFLIS"), and NSDUH. This methodology follows prior research by Birnbaum et al. (2011) and Florence et al. (2016). Birnbaum, Howard G., Alan G. White, Matt Schiller, Tracy Waldman, Jody M. Cleveland, and Carl L. Roland. "Societal costs of prescription opioid abuse, dependence, and misuse in the United States." *Pain Medicine* 12, no. 4 (2011): 657-667; Bronson, Jennifer, Jessica Stroop, Stephanie Zimmer, and Marcus Berzofsky. "Drug Use, Dependence, and Abuse Among State Prisoners and Jail Inmates, 2007-2009." *U.S. Department of Justice, Bureau of Justice Statistics Special Report NCJ 250546* (June 2017): 1-26.
- [6]: Historical Child Welfare costs include the cost of Child Protective Services and foster care that are attributable to the opioid epidemic. Costs of the child welfare system are from Child Trend Reports published by the Annie E. Casey Foundation and the Urban Institute. The portion of costs attributable to the opioid epidemic are computed based on the econometric models from Ghertner et al. (2018). See Ghertner, Robin, Annette Waters, Laura Radel, and Gilbert Crouse. "The role of substance use in child welfare caseloads." *Children and Youth Services Review* 90 (2018): 83-93.
- [7]: Program Costs Related to Adverse Childhood Experiences ("ACEs") prevention and treatment include the cost of screening, care management, initial treatment and young adult depression treatment. The costs associated with collaboration, planning, administration, provider training and public education are also included. Estimated costs incorporate a measure of states' likelihood of developing the various programs.
- [8]: Total education expenses are from the Department of Education. The portion of costs that relate to substance abuse are from the National Center on Addiction and Substance Abuse. Substance abuse costs are apportioned to opioids using NSDUH. The percent of costs paid by Federal and State sources are from the US Census Bureau. National Center on Addiction and Substance Abuse (CASA). "Shoveling up II: The impact of substance abuse on federal, state and local budgets." (2009).
- [9]: Income and Sales Tax costs include lost income tax and sales tax for the states and territories as a result of lower labor force participation resulting from opioid use, opioid related deaths and opioid related incarcerations. Estimates are based on the framework developed by Segel et al. (2019). See Segel, Joel E., Yunfeng Shi, John R. Moran, and Dennis Patrick Scanlon. "Opioid misuse, labor market outcomes, and means-tested public expenditures: a conceptual framework." *Am J Manag Care* 25 (2019): S270-S276. A multiplier of 2 was applied to lost income from labor force exits. Typically, a small portion of state sales tax is maintained by local governments. The municipal portion has not been estimated.

Consolidated Claim Information Sheet

**Cost of the Opioid Epidemic to the U.S. States & Territories
Including Disbursement of Federal Funds
(2020 USD billions)**

[10]: Other Abatement Strategies include surveillance programs, such as Health Information Exchange, Program Management Monitoring/Evaluation, and Prescription Monitoring Program System/Upgrades. Cost estimates are based on the Ruhm Report and OUD population projections using the framework by Pitt et al. (2018).

[11]: Sum([1]-[10]).

SCHEDULE 1

CLAIMANTS

STATES (INCL. D.C.)

- Alabama
- Alaska
- Arizona
- Arkansas
- California
- Colorado
- Connecticut
- Delaware
- District of Columbia
- Florida
- Georgia
- Hawaii
- Idaho
- Illinois
- Indiana
- Iowa
- Kansas
- Kentucky
- Louisiana
- Maine
- Maryland

(STATES Cont.)

- Massachusetts
- Michigan
- Minnesota
- Mississippi
- Missouri
- Montana
- Nebraska
- Nevada
- New Hampshire
- New Jersey
- New Mexico
- New York
- North Carolina
- North Dakota
- Ohio
- Oregon
- Pennsylvania
- Rhode Island
- South Carolina
- South Dakota
- Tennessee

- Texas
- Utah
- Vermont
- Virginia
- Washington
- West Virginia
- Wisconsin
- Wyoming

TERRITORIES

- American Samoa
- Guam
- Northern Mariana Islands
- Puerto Rico
- U.S. Virgin Islands

SCHEDULE 10

STATE/TERRITORY SUPPLEMENT CLAIMS

Schedule	Jurisdiction
10.1	Alabama
10.2	Alaska
10.3	Arizona
10.4	Arkansas
10.5	California
10.6	Colorado
10.7	Connecticut
10.8	Delaware
10.9	District of Columbia
10.10	Florida
10.11	Georgia
10.12	Hawaii
10.13	Idaho
10.14	Illinois
10.15	Indiana
10.16	Iowa
10.17	Kansas
10.18	Kentucky
10.19	Louisiana
10.20	Maine
10.21	Maryland

Schedule	Jurisdiction
10.22	Massachusetts
10.23	Michigan
10.24	Minnesota
10.25	Mississippi
10.26	Missouri
10.27	Montana
10.28	Nebraska
10.29	Nevada
10.30	New Hampshire
10.31	New Jersey
10.32	New Mexico
10.33	New York
10.34	North Carolina
10.35	North Dakota
10.36	Ohio
10.37	Reserved
10.38	Oregon
10.39	Pennsylvania
10.40	Rhode Island
10.41	South Carolina
10.42	South Dakota
10.43	Tennessee
10.44	Texas

Schedule	Jurisdiction
10.45	Utah
10.46	Vermont
10.47	Virginia
10.48	Washington
10.49	West Virginia
10.50	Wisconsin
10.51	Wyoming
10.52	American Samoa
10.53	Guam
10.54	Northern Mariana Islands
10.55	Puerto Rico
10.56	U.S. Virgin Islands

Schedule 10.1 - Alabama

In re Purdue Pharma, L.P., et al.

United States Bankruptcy Court

Southern District of New York

Case No.: 19-23649 (RDD)

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

The Claimant notes that this claim was prepared with limited time and information to meet the bankruptcy filing deadline, and it is not expected to, and does not, reflect all expenses, damages, or future costs or abatement needs, nor does it imply that all such amounts are fully allocable to Purdue, which is a legal question beyond the scope or purpose of the analysis.

Part 1: Identify the Claimant			
1. Name of Claimant.	Name: State of Alabama		
2. Where should notices to the Claimant be sent?	Name: Michael G. Dean Office of the Attorney General		
	Address: 501 Washington Avenue, P.O. Box 300152		
	City: Montgomery	State: Alabama	ZIP Code: 36130-0152
	Contact phone: 334-353-0415		
	Contact email: michael.dean@alabamaag.gov		
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.		

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
<p>4. The Claimant has commenced a lawsuit by filing the following complaint (the “<u>Complaint</u>”) against the Debtors:</p>	Case Name: State of Alabama v. Purdue Pharma, LP, et al.
	Case Number: CV-2019-901174.00
	Court Name: Montgomery County, Alabama
	Date the Complaint was filed: 6/20/2019
	Was the Complaint sealed at filing? Sealed shortly after filing
	If so, does the Complaint remain under seal? Yes
	<p>Causes of action asserted in the Complaint:</p> <ol style="list-style-type: none"> 1. Public Nuisance 2. Deceptive Trade Practices Act violations 3. Alabama Controlled Substances Act violations 4. Negligence 5. Wantonness 6. Unjust Enrichment
<p>5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:</p>	<p>1. Civil Conspiracy</p>
<p>6. Supporting Documentation:</p>	<p>In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.</p>

7. Claim Amount ⁴	\$35,331,000,000
Part 3: Sign Below	
<p>8. The person completing this authorization form must sign and date it.</p>	<p>I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.</p> <p>Executed on: <u>07/30/2020</u></p> <p>Steve Marshall Attorney General of Alabama</p> <p>By: <u>/s/ Michael G. Dean</u> Michael G. Dean Assistant Attorney General 501 Washington Avenue P.O. Box 300152 Montgomery, Alabama 36130-0152 (334) 353-0415 michael.dean@alabamaag.gov</p>

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Schedule 10.2 - Alaska

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Basis of Claim/Reservation of Rights” annexed to the Consolidated Claim.

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Consolidated Claim.

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Alaska
2. Where should notices to the Claimant be sent?	Name: Margaret Paton-Walsh
	Address: 1031 W. Fourth Avenue, #200
	City: Anchorage State: AK ZIP Code: 99501
	Contact phone: (907) 269.5100
	Contact email: Margaret.paton-walsh@alaska.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Alaska v. Purdue Pharma LP., Purdue Pharma Inc., The Purdue Frederick Company and Rhodes Pharmaceuticals L.P., and Jane Does 1-10
	Case Number: 3AN1709966
	Court Name: Superior Court for the State of Alaska, Third Judicial District Anchorage

Date the Complaint was filed: 10/17/2017	
Was the Complaint sealed at filing? Yes	
If so, does the Complaint remain under seal? A redacted version is publicly available	
Causes of action asserted in the Complaint: <ol style="list-style-type: none"> 1. Violations of Unfair Trade Practices (UTPA) and Consumer Protection Act 2. Violations of Alaska Medical Assistance False Claim and Reporting Act 3. Public Nuisance 4. Fraud and Negligence/Negligent Misrepresentation 5. Strict Products liability – Design Defect and Failure to Warn 6. Unjust enrichment 	
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
6. Supporting Documentation:	
7. Claim Amount ⁴	\$8,942,000,000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/20 (mm/dd/yy)

Kevin Clarkson, Alaska Attorney General

By: /s/ Margaret Paton-Walsh

Margaret Paton-Walsh

Chief, Assistant General Attorney

1031 W. Fourth Avenue, #200

Anchorage, AK 99501

Margaret.paton-walsh@alaska.gov

Schedule 10.3 - Arizona

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Arizona
2. Where should notices to the Claimant be sent?	Name: Rebecca Eggleston, Office of the Attorney General
	Address: 2005 N. Central Ave.
	City: Phoenix State: AZ ZIP Code: 85004
	Contact phone: (602) 542-8312
	Contact email: Rebecca.Eggleston@azag.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Arizona, <i>ex rel.</i> Mark Brnovich v. Purdue Pharma L.P., Purdue Pharma, Inc., and the Purdue Frederick Company, Inc. (d/b/a the Purdue Frederick Company)
	Case Number: C20072471
	Court Name: Superior Court of Arizona, Pima County

Date the Complaint was filed: OSC filed on September 10, 2018 for Purdue's violation of the Superior Court's Consent Judgment entered May 14, 2007	
Was the Complaint sealed at filing? No	
If so, does the Complaint remain under seal? N/A	
Causes of action asserted in the Complaint: <ol style="list-style-type: none"> 1. The State of Arizona filed an Application for an Order to Show Cause for Purdue's violation of the Superior Court's Consent Judgment entered May 14, 2007 2. The underlying complaint filed in May 2007 alleged the following causes of action: <ol style="list-style-type: none"> a. Deceptive Acts or Practices, A.R.S. § 44-1521 	
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	<ol style="list-style-type: none"> 1. Consumer Fraud Act, A.R.S. § 44-1521 et seq. (This was alleged in the original complaint that was resolved with a consent judgment in 2007 but has not been alleged as an independent cause of action in the State's present-day proceedings against Purdue.) 2. Public Nuisance, A.R.S. § 13-2917 3. Pattern of Unlawful Activity, A.R.S. § 13-2314.04 4. Common Law Fraud 5. Unjust Enrichment 6. Negligence
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$55,792,000,000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

Mark Brnovich
Attorney General for the State of Arizona

By: /s/ Rebecca Eggleston
Rebecca Eggleston
Section Chief Counsel
Office of the Attorney General
Consumer Protection & Advocacy Section
2005 N. Central Ave.
Phoenix, AZ 85004
(602) 542-8312

Schedule 10.4 - Arkansas

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Arkansas
2. Where should notices to the Claimant be sent?	Name: Charles J. Harder
	Address: 323 Center Street, Suite 200
	City: Little Rock State: AR ZIP Code: 72201
	Contact phone: (501) 682-4058
	Contact email: chuck.harder@arkansasag.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Arkansas, ex rel. Leslie Rutledge, Attorney General v. Purdue Phama L.P., et al.
	Case Number: 60CV-18-2018
	Court Name: Circuit Court of Pulaski County, Arkansas, Sixteenth Division

Date the Complaint was filed: March 29, 2018	
Was the Complaint sealed at filing? No	
If so, does the Complaint remain under seal? N/A	
Causes of action asserted in the Complaint:	
<ol style="list-style-type: none"> 1. Violations of Arkansas Deceptive Trade Practices Act (“ADTPA”), Ark. Code Ann. §§ 4-88-101, et seq. 2. Violations of Medicaid Fraud False Claims Act, Ark. Code Ann. §§ 20-77-901, et seq. 3. Public Nuisance 4. Unjust Enrichment 5. Civil Conspiracy 	
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	None
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$20,983,000,000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/20 (mm/dd/yy)

LESLIE RUTLEDGE
ATTORNEY GENERAL
323 Center Street, Suite 200
Little Rock, Arkansas 72201

By: 

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Schedule 10.5 - California

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of California and the People of the State of California, by and through Attorney General Xavier Becerra, Claimant’s Chief Law Officer⁴
2. Where should notices to the Claimant be sent?	Name: Judith Fiorentini
	Address: 600 West Broadway, Suite 1800
	City: San Diego State: CA ZIP Code: 92101
	Contact phone: (619) 738-9343
	Contact email: judith.fiorentini@doj.ca.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a	Case Name: The People of the State of California v. Purdue Pharma L.P., et al.

⁴ This claim supplants and supersedes any other claims made by any party in the name of the People of the State of California or the State of California, or to obtain relief or remedies on behalf of the People, the State, or any agency thereof.

lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Number: 19STCV19045
	Court Name: Los Angeles Superior Court
	Date the Complaint was filed: June 3, 2019
	Was the Complaint sealed at filing? A redacted version was filed.
	If so, does the Complaint remain under seal? The publicly filed copy of the complaint is partially redacted.
	Causes of action asserted in the Complaint:
	<ol style="list-style-type: none"> 1. Violations of California Civil Code section 3494 2. Violations of California Business and Professions Code section 17200 et seq. 3. Violations of California Business and Professions Code section 17500 et seq.
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	<ol style="list-style-type: none"> 1. Violations of California Government Code section 12650 et seq. 2. Common law fraud. 3. Unjust enrichment.
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁵	\$192,092,000,000

⁵ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

4. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

By: /s/ Gayle Weller
Gayle Weller
Associate Governmental Program Analyst
California Attorney General's Office
600 West Broadway, Suite 1800
San Diego, CA 92101
(619) 738-9310
Gayle.weller@doj.ca.gov

Schedule 10.6 - Colorado

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Basis of Claim/Reservation of Rights” annexed to the Consolidated Claim.

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Consolidated Claim.

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Colorado
2. Where should notices to the Claimant be sent?	Name: Megan Paris Rundlet
	Address: 1300 Broadway, 10th Floor
	City: Denver State: CO ZIP Code: 80203
	Contact phone: (508) 720-6000
	Contact email: Megan.Rundlet@coag.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Colorado ex rel Philip J Weiser, Attorney General v. Purdue Pharma, L.P.; Purdue Pharma, Inc.; Rhodes Pharmaceuticals, L.P.; MNP Consulting Limited; Richard Sackler; Mortimer D.A. Sackler; Jonathan Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; David Sackler; Russell Gasdia; Mark Timney; Craig Landau; and James David Haddox
	Case Number: 2018CV33300

Court Name: **Denver District Court**

Date the Complaint was filed: **September 6, 2018**

Was the Complaint sealed at filing? **Yes**

If so, does the Complaint remain under seal? **No**

Causes of action asserted in the Complaint:

- 1. Violation of the Colorado Consumer Protection Act: C.R.S. § 6-1-105(1)(e) against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; MNP Consulting Limited; Richard Sackler; Mortimer D.A. Sackler; Jonathan Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; David Sackler; Mark Timney; Craig Landau; and David Haddox**
- 2. Violation of the Colorado Consumer Protection Act: C.R.S. § 6-1-105(1)(u) against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; MNP Consulting Limited, Richard Sackler; Mortimer D.A. Sackler; Jonathan Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; David Sackler; Mark Timney; Craig Landau; and David Haddox**
- 3. Violation of the Colorado Consumer Protection Act: C.R.S. § 6-1-105(1)(g) against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; MNP Consulting Limited; Richard Sackler; Mortimer D.A. Sackler; Jonathan Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; David Sackler; Mark Timney; Craig Landau; and David Haddox**
- 4. Violation of the Colorado Consumer Protection Act: C.R.S. § 6-1-105(1)(b) against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; MNP Consulting Limited; Richard Sackler; Mortimer D.A. Sackler; Jonathan Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; David Sackler; Mark Timney; Craig Landau; and David Haddox**
- 5. Violation of the Colorado Consumer Protection Act: C.R.S. § 6-1-105(1)(c) against Defendants Purdue Pharma, L.P.;**

Purdue Pharma, Inc.; MNP Consulting Limited; Richard Sackler; Mortimer D.A. Sackler; Jonathan Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; David Sackler; Mark Timney; Craig Landau; and David Haddox

- 6. Violation of the Colorado Consumer Protection Act: C.R.S. § 6-1-105(1)(h) against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; MNP Consulting Limited; Richard Sackler; Mortimer D.A. Sackler; Jonathan Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; David Sackler; Mark Timney; Craig Landau; and David Haddox**
- 7. Violation of the Colorado Consumer Protection Act: C.R.S. § 6-1-105(1)(nnn) against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; MNP Consulting Limited; Richard Sackler; Mortimer D.A. Sackler; Jonathan Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; David Sackler; Mark Timney; Craig Landau; and David Haddox**
- 8. Common Law Public Nuisance against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; Rhodes Pharmaceuticals, L.P.; MNP Consulting Limited; Richard Sackler; Mortimer D.A. Sackler; Jonathan Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; David Sackler; Mark Timney; Craig Landau; and David Haddox**
- 9. Negligence against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; Rhodes Pharmaceuticals, L.P.; MNP Consulting Limited; Richard Sackler; Mortimer D.A. Sackler; Jonathan Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; David Sackler; Mark Timney; Craig Landau; and David Haddox**
- 10. Fraudulent Misrepresentation against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; MNP Consulting Limited; Richard Sackler; Mortimer D.A. Sackler; Jonathan Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; David Sackler; Mark Timney; Craig Landau; and David Haddox**
- 11. Fraudulent Concealment against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; MNP Consulting Limited; Richard Sackler; Mortimer D.A. Sackler; Jonathan**

Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; David Sackler; Mark Timney; Craig Landau; and David Haddox

12. Violation of the Colorado Organized Crime Control Act, C.R.S. §§ 18-17-104(3) and 18-17-104(4) against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; MNP Consulting Limited; Richard Sackler; Mortimer D.A. Sackler; Jonathan Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; David Sackler; Mark Timney; Craig Landau; David Haddox; and Russell Gasdia. In addition to the description of the claims set forth on behalf of all states, the State of Colorado brought claims under the Colorado Organized Crime Control Act (COCCA), §§18-17-104(1) - (4), C.R.S., alleging that Purdue constitutes an enterprise that developed and deployed a promotional scheme to defraud Colorado health care providers, patients, the public, and the State of Colorado regarding the safety and efficacy of opioids. But for Purdue's violation of COCCA, the state would not have paid for opioid prescriptions or the costs of opioid addiction, overdose, and death. Purdue knowingly received proceeds derived directly or indirectly from a pattern of racketeering, and it knowingly acquired or maintained, directly or indirectly, an interest in or control of an enterprise. Under COCCA, a defendant is liable for threefold the actual damages sustained, attorney fees in trial and appellate courts, and the costs of investigation and litigation reasonably incurred. Additionally, COCCA provides that all property, real or personal, including money, used in the course of, derived from, or realized through conduct in violation of § 18-17-104, is subject to civil forfeiture to the state.

13. Violation of the Colorado Organized Crime Control Act, C.R.S. §§ 18-17-104(1), (2), and (4) against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; Rhodes Pharmaceuticals, L.P.; MNP Consulting Limited; Richard Sackler; Mortimer D.A. Sackler; Jonathan Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; and David Sackler. In addition to the description of the claims set forth on behalf of all states, the State of Colorado brought claims under the Colorado Organized Crime Control Act (COCCA), §§18-17-104(1) - (4), C.R.S., alleging that Purdue constitutes an enterprise that developed and deployed a promotional scheme to defraud Colorado health care providers, patients, the public, and the State of

Colorado regarding the safety and efficacy of opioids. But for Purdue's violation of COCCA, the state would not have paid for opioid prescriptions or the costs of opioid addiction, overdose, and death. Purdue knowingly received proceeds derived directly or indirectly from a pattern of racketeering, and it knowingly acquired or maintained, directly or indirectly, an interest in or control of an enterprise. Under COCCA, a defendant is liable for threefold the actual damages sustained, attorney fees in trial and appellate courts, and the costs of investigation and litigation reasonably incurred. Additionally, COCCA provides that all property, real or personal, including money, used in the course of, derived from, or realized through conduct in violation of § 18-17-104, is subject to civil forfeiture to the state.

14. Violation of the Colorado Uniform Fraudulent Transfer Act – Intentionally Fraudulent Transfers, C.R.S. § 38-8-105(1)(a) against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; MNP Consulting Limited; Richard Sackler; Mortimer D.A. Sackler; Jonathan Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; and David Sackler
15. Violation of the Colorado Uniform Fraudulent Transfer Act – Intentionally Fraudulent Transfers, C.R.S. § 38-8-105(1)(a) against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; and Rhodes Pharmaceuticals, L.P.
16. Violation of the Colorado Uniform Fraudulent Transfer Act – Constructively Fraudulent Transfers, C.R.S. § 38-8-105(1)(b) against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; MNP Consulting Limited; Richard Sackler; Mortimer D.A. Sackler; Jonathan Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; and David Sackler
17. Violation of the Colorado Uniform Fraudulent Transfer Act – Constructively Fraudulent Transfers, C.R.S. § 38-8-105(1)(b) against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; MNP Consulting Limited; and Rhodes Pharmaceuticals, L.P.
18. Violation of the Colorado Uniform Fraudulent Transfer Act – Constructively Fraudulent Transfers, C.R.S. § 38-8-106(1) against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; MNP Consulting Limited; Richard Sackler; Mortimer

D.A. Sackler; Jonathan Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; and David Sackler

- 19. Violation of the Colorado Uniform Fraudulent Transfer Act – Constructively Fraudulent Transfers, C.R.S. § 38-8-106(1) against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; MNP Consulting Limited; and Rhodes Pharmaceuticals, L.P.**
- 20. Violation of the Colorado Uniform Fraudulent Transfer Act – Preferential Transfers, C.R.S. § 38-8-106(2) against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; Richard Sackler; Mortimer D.A. Sackler; Jonathan Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; David Sackler; Craig Landau; and Mark Timney**
- 21. Civil Conspiracy to Fraudulently Transfer Assets against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; MNP Consulting Limited; Richard Sackler; Mortimer D.A. Sackler; Jonathan Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; and David Sackler**
- 22. Civil Conspiracy to Fraudulently Transfer Assets against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; Rhodes Pharmaceuticals, L.P.; and MNP Consulting Limited**
- 23. Civil Conspiracy to Defraud against Defendants Purdue Pharma, L.P.; Purdue Pharma, Inc.; MNP Consulting Limited; Richard Sackler; Mortimer D.A. Sackler; Jonathan Sackler; Kathe Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; David Sackler; Mark Timney; Craig Landau; and David Haddox**

5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:

6. Supporting Documentation: In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.

7. Claim Amount⁴ **\$39,886,000,000**

Part 3: Sign Below

8. The person completing this authorization form must sign and date it. I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/20 (mm/dd/yy)

PHILIP J. WEISER
Attorney General for the State of Colorado

By: /s/ Leslie A. Eaton

Leslie A. Eaton
1300 Broadway, 7th Floor
Denver CO 80203
(508) 720-6000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Schedule 10.7 - Connecticut

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Connecticut
2. Where should notices to the Claimant be sent?	Name: Jeremy Pearlman, Assistant Attorney General
	Address: 165 Capitol Avenue
	City: Hartford State: CT ZIP Code: 06106
	Contact phone: 860-808-5440
	Contact email: jeremy.pearlman@ct.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Connecticut vs. Purdue Pharma L.P., et al
	Case Number: X07 HHD-CV-19-6105325-S
	Court Name: Superior Court Complex Litigation Docket At Hartford
	Date the Complaint was filed: January 2, 2019

Was the Complaint sealed at filing? **Yes**

If so, does the Complaint remain under seal? **No**

Causes of action asserted in the Complaint:

- 1. Violation of the Connecticut Unfair Trade Practices Act (Connecticut General Statutes § 42-110a, et seq.); Deception committed by Purdue Pharma L.P. and Purdue Pharma Inc.**
- 2. Violation of the Connecticut Unfair Trade Practices Act (Connecticut General Statutes § 42-110a, et seq.); Unfairness committed by Purdue Pharma L.P. and Purdue Pharma Inc.**
- 3. Violation of the Connecticut Unfair Trade Practices Act (Connecticut General Statutes § 42-110a, et seq.); Deception committed by Richard Sackler, Jonathan Sackler, David Sackler, Mortimer D.A. Sackler, Kathe Sackler, Ilene Sackler Lefcourt, Beverly Sackler, Theresa Sackler, Frank Peter Boer, Paulo Costo, Cecil Pickett, Ralph Snyderman, Judith Lewent, John Stewart, and Mark Timney**
- 4. Violation of the Connecticut Unfair Trade Practices Act (Connecticut General Statutes § 42-110a, et seq.) Unfairness committed by Richard Sackler, Jonathan Sackler, David Sackler, Mortimer D.A. Sackler, Kathe Sackler, Ilene Sackler Lefcourt, Beverly Sackler, Theresa Sackler, Frank Peter Boer, Paulo Costo, Cecil Pickett, Ralph Snyderman, Judith Lewent, John Stewart, and Mark Timney**
- 5. Fraudulent Transfer of Assets pursuant to Connecticut General Statutes § 52-552h**

5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:

6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$50,686,000,000

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.
- I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

William Tong
Attorney General for the State of Connecticut

By: /s/ Jeremy Pearlman
Jeremy Pearlman
Assistant Attorney General
165 Capitol Avenue
Hartford, CT 06106
jeremy.pearlman@ct.gov
860-808-5440

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Schedule 10.8 - Delaware

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Delaware
2. Where should notices to the Claimant be sent?	Name: Marion Quirk
	Address: 820 N. French Street
	City: Wilmington State: DE ZIP Code: 19801-3536
	Contact phone: (302) 577-8841
	Contact email: Marion.Quirk@delaware.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: STATE OF DELAWARE, ex rel. KATHLEEN JENNINGS, Attorney General of the State of Delaware, PLAINTIFF, v. PURDUE PHARMA L.P., PURDUE PHARMA INC., THE PURDUE FREDERICK COMPANY, ENDO HEALTH SOLUTIONS INC., ENDO PHARMACEUTICALS INC., MCKESSON CORPORATION, CARDINAL HEALTH, INC., AMERISOURCEBERGEN DRUG CORPORATION,

ANDA PHARMACEUTICALS, INC., H. D. SMITH, LLC, WALGREEN CO., and WALGREEN EASTERN CO., INC., DEFENDANTS	
Case Number: N18C-01-223 MMJ CCLD	
Court Name: Superior Court of the State of Delaware	
Date the Complaint was filed: COMPLAINT: 01/19/2018; FIRST AMENDED COMPLAINT: 04/02/2019	
Was the Complaint sealed at filing? COMPLAINT: NO; FIRST AMENDED COMPLAINT: YES	
If so, does the Complaint remain under seal? COMPLAINT: N/A; FIRST AMENDED COMPLAINT: YES, BUT A PUBLIC/REDACTED VERSION IS AVAILABLE.	
Causes of action asserted in the Complaint: <ol style="list-style-type: none"> 1. CONSUMER FRAUD (against Manufacturer Defendants and Distributor Defendants) 2. NEGLIGENCE (against Manufacturer Defendants, Distributor Defendants, and Pharmacy Defendant) 	
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	<ol style="list-style-type: none"> 1. NUISANCE (in original complaint; dismissed by Court) 2. UNJUST ENRICHMENT (in original complaint; dismissed without prejudice by Court) 3. CIVIL CONSPIRACY (in original complaint; dismissed without prejudice by Court)
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$15,756,000,000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

KATHLEEN JENNINGS, DELAWARE ATTORNEY GENERAL
Attorney General for the State of Delaware

By: /s/ Marion Quirk
Marion Quirk
Assistant Director of Investor Protection
Carvel State Building
820 N. French Street
Wilmington, DE 19801-3536
302-577-8841
Marion.Quirk@delaware.gov

Schedule 10.9 - District of Columbia

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: District of Columbia
2. Where should notices to the Claimant be sent?	Name: Kathleen Konopka, Deputy Attorney General
	Address: 441 Fourth Street, N.W., Suite 600 South
	City: Washington State: DC ZIP Code: 20001
	Contact phone: 212-724-6610
	Contact email: Kathleen.Konopka@dc.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: District of Columbia v. Purdue Pharma L.P., Purdue Pharma Inc. and Richard Sackler
	Case Number: 2019 CA 003680 B
	Court Name: Superior Court for the District of Columbia

Date the Complaint was filed: 6/8/19	
Was the Complaint sealed at filing? No – but it was redacted	
If so, does the Complaint remain under seal? Unredacted version filed	
Causes of action asserted in the Complaint: <ol style="list-style-type: none"> 1. Representing that goods have characteristics they do not have in violation of D.C. Code § 28-3904(a) 2. Misrepresentation of material facts in violation of D.C. Code § 28-3904(e) 3. Failures to state material facts in violation of D.C. Code § 28-3904(f) 	
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action: 6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases .
7. Claim Amount ⁴	\$9,490,000,000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/20 (mm/dd/yy)

KARL A. RACINE
Attorney General for the District of Columbia

By: /s/ Kathleen Konopka
KATHLEEN KONOPKA
Deputy Attorney General
Public Advocacy Division
Office of the Attorney General
441 Fourth Street, N.W., Suite 600 South
Washington, D.C. 20001
202 724-6610

Schedule 10.10 - Florida

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Florida
2. Where should notices to the Claimant be sent?	Name: John Guard
	Address: PL-01, The Capitol
	City: Tallahassee State: FL ZIP Code: 32399-1050
	Contact phone: (850) 414-3300
	Contact email: John.Guard@myfloridalegal.com
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Florida, Office of the Attorney General, Department of Legal Affairs v. Purdue Pharma, L.P., et al.
	Case Number: 2018-CA-001438
	Court Name: Circuit Court of the Sixth Judicial Circuit for Pasco County, Florida
	Date the Complaint was filed: Original Complaint filed May 15, 2018; Amended Complaint filed November 16, 2018

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

Ashley Moody
Attorney General for the State of Florida

By: /s/ John Guard
John Guard
Chief Deputy Attorney General
John.Guard@myfloridalegal.com
Patricia A. Conners
Deputy Attorney General
Trish.Conners@myfloridalegal.com
Russell S. Kent
Special Counsel for Litigation
Russell.Kent@myfloridalegal.com
Gregory S. Slemp
Senior Assistant Attorney General
Greg.Slemp@myfloridalegal.com
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55 Alhambra Plaza, Suite 800
Coral Gables, FL 33134
(305) 722-2002

Schedule 10.11 - Georgia

In re Purdue Pharma, L.P., et al.

United States Bankruptcy Court

Southern District of New York

Case No.: 19-23649 (RDD)

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

document titled “Attachment to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).⁴⁵

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Georgia
2. Where should notices to the Claimant be sent?	Name: Anne S. Infinger, Deputy Attorney General
	Address: 2 Martin Luther King, Jr. Drive, Suite 356
	City: Atlanta State: GA ZIP Code: 30334
	Contact phone: 404-656-7711
	Contact email: ainfinger@law.ga.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

⁴ The State of Georgia remains in active litigation against a number of non-Purdue entities in State Court, where fact discovery is ongoing, experts have not been disclosed and experts’ work product (including damage calculations, methodologies, and analyses) is not finalized. This proof of claim is not intended to be and should not be interpreted as the final damage analysis in Georgia’s state court litigation or Georgia’s position regarding the responsibility of non-Purdue entities. Georgia reserves the right, where applicable, to supplement and/or amend this analysis as more information is obtained and its experts’ work product is finalized.

⁵ By using certain time periods to determine the claim amount utilized herein, the State of Georgia is not admitting that such timeframe encompasses the total time period during which it sustained damages, or which are pertinent to calculating the State’s damages, related to the opioid crisis or any responsible party.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors

4. The Claimant has commenced a lawsuit by filing the following complaint (the "Complaint") against the Debtors:

Case Name: **State of Georgia v. Purdue Pharma, et al.**

Case Number: **Civil Action No. 19-A-00060-4**

Court Name: **Superior Court of Gwinnett County, Georgia – Business Case Division**

Date the Complaint was filed: **01/03/2019**

Was the Complaint sealed at filing? **No**

If so, does the Complaint remain under seal? **N/A**

Causes of action asserted in the Complaint:

- 1. Georgia Racketeer Influenced and Corrupt Organizations (O.C.G.A. § 16-4-4)**
- 2. RICO Conspiracy (O.C.G.A. § 16-14-4(c))**
- 3. Public Nuisance (O.C.G.A. § 41-1-1)**
- 4. Negligence**
- 5. Unjust Enrichment**
- 6. Civil Conspiracy**
- 7. False Advertising (O.C.G.A. § 10-1-420, et seq.)**
- 8. Negligence Per Se**
- 9. Breach of Statutory Duty (O.C.G.A. § 51-1-6)**

<p>5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:</p> <p>6. Supporting Documentation:</p>	<p>1. Violations of the Fair Business Practices Act (O.C.G.A. § 10-1-390, et seq.)</p> <p>In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.</p>
<p>7. Claim Amount⁶</p>	<p>\$49,828,000,000</p>

Part 3: Sign Below	
<p>8. The person completing this authorization form must sign and date it.</p>	<p>I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.</p> <p>Executed on: <u>07/30/2020</u></p> <p>Christopher M. Carr Attorney General for the State of Georgia</p> <p>By: <u>/s/ Anne S. Infinger</u> Anne S. Infinger, Deputy Attorney General 2 Martin Luther King, Jr. Drive, Suite 356 Atlanta, Georgia 30334 404-656-7711</p>

⁶ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Schedule 10.12 – Hawai‘i

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Hawai‘i
2. Where should notices to the Claimant be sent?	Name: Bryan C. Yee
	Address: 425 Queen Street
	City: Honolulu State: HI ZIP Code: 96813
	Contact phone: (808) 586-1180
	Contact email: bryan.c.yee@hawaii.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Hawai‘i ex rel. Clare E. Connors, Attorney General vs. Purdue Pharma L.P.; Purdue Pharma, Inc.; The Purdue Frederick Company, Inc.; Richard S. Sackler, Beverly Sackler, David A. Sackler, Ilene Sackler Lefcourt, Jonathan D. Sackler, Kathe Sackler, Mortimer D.A. Sackler, and Theresa Sackler, and Doe Defendants 1 to 100

Case Number: Civil No. 19-1-0862-06 JHA	
Court Name: Circuit Court of the First Circuit, State of Hawai‘i	
Date the Complaint was filed: June 3, 2019	
Was the Complaint sealed at filing? No	
If so, does the Complaint remain under seal? N/A	
Causes of action asserted in the Complaint: <ol style="list-style-type: none"> 1. Unfair or Deceptive Acts or Practices, Hawaii Revised Statutes (“HRS”) § 480-2 – Civil Penalties 2. Unfair or Deceptive Acts or Practices Targeting Elders, HRS § 480-13.5 3. Additional claims for relief under HRS § 661-10 and other applicable Hawai‘i common law and/or equity, including but not limited to disgorgement of profits in order to prevent unjust enrichment and punitive damages for tortious conduct involving willful, wanton, oppressive, malicious, criminally indifferent and/or grossly negligent misconduct 	
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	<ol style="list-style-type: none"> 1. Common law nuisance 2. Common law negligence 3. Unfair or Deceptive Acts or Practices, HRS § 480-14 – Injuries to State
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.

7. Claim Amount⁴

\$7,754,000,000

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/20 (mm/dd/yy)

Clare E. Connors
Attorney General for the State of Hawaii

By: /S/ Bryan C. Yee
Bryan C. Yee
Deputy Attorney General
425 Queen Street
Honolulu, HI 96813
(808) 586-1180

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Schedule 10.13 - Idaho

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Idaho
2. Where should notices to the Claimant be sent?	Name: Brett DeLange, Deputy Attorney General
	Address: P.O. Box 83720
	City: Boise State: ID ZIP Code: 83720-0010
	Contact phone: 208.334.4114
	Contact email: brett.delange@ag.idaho.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Idaho through Attorney General Lawrence G. Wasden v. Purdue Pharma L.P., Purdue Pharma Inc., Richard Sackler, Theresa Sackler, Kathe Sackler, Jonathan Sackler, Mortimer D.A. Sackler, Beverly Sackler, David Sackler, and Ilene Sackler Lefcourt
	Case Number: CV01-19-10061
	Court Name: District Court of the Fourth Judicial District of the State of Idaho, in and for the County of Ada

Date the Complaint was filed: June 3, 2019	
Was the Complaint sealed at filing? No	
If so, does the Complaint remain under seal? N/A	
Causes of action asserted in the Complaint: 1. Violations of the Idaho Consumer Protection Act—Idaho Code Sections 48-601 et seq 2. Public Nuisance—Idaho Code Sections 52-101 et seq. 3. Negligence	
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action: 6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$16,129,000,000

Part 3: Sign Below	
8. The person completing this authorization form must sign and date it.	I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

Lawrence G. Wasden
Attorney General for the State of Idaho

By: /s/ Brett DeLange
Brett DeLange
Deputy Attorney General
Idaho Attorney General's Office
Consumer Protection Division
P.O. Box 83720 ☐
Boise, ID 83720-0010
Tel: 208.334.4114

Schedule 10.14 - Illinois

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Illinois and the People of the State of Illinois, by and through Attorney General Kwame Raoul, Claimant’s Chief Law Officer⁴
2. Where should notices to the Claimant be sent?	Name: Susan Ellis, Division Chief
	Address: 100 W. Randolph St., 12th Floor
	City: Chicago State: IL ZIP Code: 60601
	Contact phone: 312-814-6351
	Contact email: sellis@atg.state.il.us
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: People of the State of Illinois v Purdue Pharma LP, Purdue Pharma Inc., Richard Sackler, Mortimer D.A. Sackler, Kathe Sackler, Ilene Sackler Lefcourt, Jonathan Sackler, Beverly Sackler, Theresa Sackler, and David Sackler Case Number: 2019 CH 04406

⁴ This claim supplants and supersedes any other claims made by any party in the name of the People of the State of Illinois or the State of Illinois, or to obtain relief or remedies on behalf of the People, the State, or any agency thereof.

Court Name: Circuit Court of Cook County, Illinois, County Department, Chancery Division	
Date the Complaint was filed: 04/05/2019	
Was the Complaint sealed at filing? The publicly-filed complaint contains redactions.	
If so, does the Complaint remain under seal? Yes, the publicly-filed complaint currently contains redactions	
Causes of action asserted in the Complaint:	
<ol style="list-style-type: none"> 1. Violations of the Illinois Consumer Fraud and Deceptive Business Practices Act 2. Public Nuisance 3. Violation of the Illinois Consumer Fraud and Deceptive Business Practices Act against the Sackler Defendants (Liability through Alter Ego and/or Direct Participation) 4. Fraudulent Transfer against the Sackler Defendants (740 ILCS 160/5) 5. Fraudulent Transfer against the Sackler Defendants (740 ILCS 160/6) 	
<p>5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:</p> <p>6. Supporting Documentation:</p>	<p>In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.</p>
7. Claim Amount ⁵	\$64,552,000,000

⁵ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/20

Kwame Raoul
Attorney General for the State of Illinois

By: /s/ Susan Ellis
Susan Ellis, Division Chief
Consumer Protection Division
Illinois Attorney General
100 W. Randolph St., 12th Floor
Chicago, IL 60601
312-814-6351

Schedule 10.15 - Indiana

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Indiana
2. Where should notices to the Claimant be sent?	Name: Scott L. Barnhart, Special Counsel
	Address: 302 W. Washington Street, IGCS 5th Floor
	City: Indianapolis State: IN ZIP Code: 46204
	Contact phone: (317) 232-6309
	Contact email: scott.barnhart@atg.in.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Indiana v. Purdue Pharma LLP, Purdue Pharma Inc., Purdue Fredrick Company
	Case Number: 49D01-1811-PL-045447
	Court Name: Marion Superior Court, Civil Division 1
	Date the Complaint was filed: November 14, 2018

<p>Was the Complaint sealed at filing? No, but the State filed both redacted and un-redacted versions of the complaint.</p> <hr/> <p>If so, does the Complaint remain under seal? No</p> <hr/> <p>Causes of action asserted in the Complaint:</p> <ol style="list-style-type: none"> 1. Violations of the Deceptive Consumer Sales Act (“DCSA”) 2. Knowing Violations of the DCSA 3. Incurable Deceptive Acts 4. Violation of the Prescription Drug Discount and Benefits Card Statute 5. False Claims—False Claims Act 6. False Claims—Indiana Medicaid False Claims Act 	
<p>5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:</p> <p>6. Supporting Documentation:</p>	<p>1. Public Nuisance</p> <p>In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.</p>
<p>7. Claim Amount⁴</p>	<p>\$58,009,000,000</p>

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

Curtis T. Hill
Attorney General for the State of Indiana

By: /s/ Joan Blackwell
Joan Blackwell, General Counsel
Cory C. Voight, Special Counsel
Scott L. Barnhart, Special Counsel
302 W. Washington Street
IGCS 5th Floor
Indianapolis, Indiana 46204
(317) 232-6309

Schedule 10.16 - Iowa

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Iowa
2. Where should notices to the Claimant be sent?	Name: Nathan Blake
	Address: 1305 East Walnut Street, 2nd Floor
	City: Des Moines State: IA ZIP Code: 50319
	Contact phone: (515) 281-5926
	Contact email: Nathan.Blake@ag.iowa.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Iowa ex rel. Thomas J. Miller, Attorney General of Iowa v. Purdue Pharma L.P., Purdue Pharma Inc., The Purdue Frederick Company, Inc. Purdue Pharma Company, P.F. Laboratories Inc. and Richard S. Sackler
	Case Number: EQCE 084514
	Court Name: Iowa District Court in and for Polk County

Date the Complaint was filed: 5/16/2019	
Was the Complaint sealed at filing? No	
If so, does the Complaint remain under seal? N/A	
Causes of action asserted in the Complaint:	
1. Violations of Iowa Consumer Fraud Act, Iowa Code Section 714.16 2. Violations of the Older Iowans Law, Iowa Code Section 714.16A	
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action: 6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$20,408,000,000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

Thomas J. Miller
Attorney General for the State of Iowa

By: /s/ Nathan Blake
Nathan Blake
Deputy Attorney General
1305 East Walnut Street, 2nd Floor
Des Moines, IA 50319
(515) 281-5926

Schedule 10.17 - Kansas

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Kansas
2. Where should notices to the Claimant be sent?	Name: Christopher Teters
	Address: 120 SW 10th Ave., 2nd Fl.
	City: Topeka State: KS ZIP Code: 66612
	Contact phone: (785) 296-3751
	Contact email: Chris.Teters@ag.ks.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Kansas ex rel. Derek Schmidt, Attorney General v. Purdue Pharma L.P. et al.
	Case Number: 2019-CV-000369
	Court Name: District Court of Shawnee County, Kansas, Third Judicial District

Date the Complaint was filed: May 16, 2019	
Was the Complaint sealed at filing? No	
If so, does the Complaint remain under seal? N/A	
Causes of action asserted in the Complaint: <ol style="list-style-type: none"> 1. Deceptive Acts and Practices, in violation of K.S.A. 50-626(b)(1)(A), 2 counts 2. Unconscionable Acts and Practices, in violation of K.S.A. 50-627(b)(1), 2 counts 3. Deceptive Acts and Practices, in violation of K.S.A. 50-626(b)(3), 4 counts 4. Deceptive Acts and Practices, in violation of K.S.A. 50-626(b)(4) 5. Unconscionable Acts, in violation of K.S.A. 50-627(b) 6. Deceptive Acts and Practices, in violation of K.S.A. 50-626(b) 	
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$15,423,000,000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

Derek Schmidt
Attorney General for the State of Kansas

By: /s/ Christopher Teters
Christopher Teters
Assistant Attorney General
120 SW 10th Ave., 2nd Fl.
Topeka, Kansas, 66612
(785) 296-3751

Schedule 10.18 - Kentucky

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned Commonwealth of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: Commonwealth of Kentucky
2. Where should notices to the Claimant be sent?	Name: Victor Maddox
	Address: 700 Capital Avenue, Suite 118
	City: Frankfort State: KY ZIP Code: 40601
	Contact phone: (502) 696-5336
	Contact email: Victor.Maddox@ky.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives and James D. Young c/o Morgan & Morgan 76 S. Laura Street, Suite 1200 Jacksonville, FL 32202

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: N/A
	Case Number:
	Court Name:
	Date the Complaint was filed:
	Was the Complaint sealed at filing?
	If so, does the Complaint remain under seal?
	Causes of action asserted in the Complaint:

5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	<p>The Commonwealth of Kentucky has identified potential causes of action including the abatement of the public nuisance of opioid addiction throughout Kentucky. In addition to this claim, Kentucky reserves its rights, premised upon rescission of the prior settlement agreement with Debtor for fraud in the inducement, breach of the duty of good faith and fair dealing, inclusion of ultra vires clauses, and non-payment, default or bankruptcy.</p> <p>As every other state claimant has, Kentucky claims harmful conduct from the date of execution of the agreement in Dec 2015 through the date of filing bankruptcy premised on similar legal theories as other state claimants, though focused on public nuisance and inclusive of all historical personal liability for the Sackler family, writ large, including for fraudulent transfers from the company.</p>
6. Supporting Documentation:	Will be provided upon request to the undersigned.
7. Claim Amount ⁴	\$42,831,000,000

Part 3: Sign Below

<p>8. The person completing this authorization form must sign and date it.</p>	<p>I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.</p> <p>Executed on: <u>July 30, 2020</u></p> <p>DANIEL CAMERON Attorney General</p> <p>BARRY DUNN Chief Deputy Attorney General</p> <p>By: <u>/s/ Victor Maddox</u> Victor Maddox Assistant Deputy Attorney General Civil Division Kentucky Office of the Attorney General 700 Capital Avenue, Suite 118 Frankfort, Kentucky 40601 (502) 696-5336</p>
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⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Victor.Maddox@ky.gov

Schedule 10.19 – Louisiana

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Louisiana
2. Where should notices to the Claimant be sent?	Name: Stacie Lambert Deblieux
	Address: 1885 N. 3rd Street
	City: Baton Rouge State: LA ZIP Code: 70802
	Contact phone: (225) 326-6400
	Contact email: deblieuxs@ag.louisiana.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Louisiana v. Purdue Pharma, L.P. et al
	Case Number: 661638
	Court Name: 19th Judicial District Court, East Baton Rouge Parish, Louisiana
	Date the Complaint was filed: September 20, 2017

Was the Complaint sealed at filing? **No**

If so, does the Complaint remain under seal? **No**

Causes of action asserted in the Complaint:

- 1) Violations of Louisiana Unfair Trade Practices Act**
 - a) Deceptive claims and material omissions about the benefits, safety and risks of opioid products**
 - b) Failure to disclose business relationships with advocacy groups and professional organizations that recommended opioid products based on scientific evidence and data**
- 2) Violations of the 2007 Agreed Judgment with Louisiana and other states**
 - a) Failure to properly establish, implement, and follow an Abuse and Diversion Detection (“ADD”) program**
 - b) Directing and incentivizing sales representatives, despite clear evidence of diversion, to target vulnerable populations and high-volume prescribers**
- 3) Louisiana False Advertising Law**
 - a) Intentionally and falsely misleading medical community and public about prevalence of chronic pain, effectiveness of opioid therapy in treating chronic pain, and risk of long-term opioid use**
 - b) Using front groups to spread misinformation under the guise of neutrality**
- 4) La. C.C. Art. 2315 and 2316 Negligence**
 - a) Acts and omissions in the promotion of harmful opioid products, interfering in the commercial marketplace and endangering the health and safety of citizens**
 - b) Failure to recognize and mitigate diversion of opioid products from legitimate medical uses to the illicit marketplace, causing harm to the health and safety of citizens**
- 5) Redhibition**
 - a) Knowingly selling products that contain redhibitory defects**
 - b) Breach of warranty of redhibition**

5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:

6. Supporting Documentation:

In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.

7. Claim Amount⁴ **\$28,061,000,000**

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

JEFF LANDRY
Attorney General for the State of Louisiana

By: /s/Stacie Lambert deBlieux
STACIE LAMBERT DEBLIEUX
Assistant Attorney General
1885 N. 3rd Street
Baton Rouge, LA 70802
(225) 326-6400
deblieuxs@ag.louisiana.gov

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Schedule 10.20 - Maine

In re Purdue Pharma, L.P., et al.

United States Bankruptcy Court

Southern District of New York

Case No.: 19-23649 (RDD)

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant		
1. Name of Claimant.	Name: State of Maine	
2. Where should notices to the Claimant be sent?	Name: Brendan F.X. O’Neil, Assistant Attorney General	
	Address: Office of the Maine Attorney General 6 State House Station	
	City: Augusta	State: ME ZIP Code: 04333
	Contact phone: (207) 626-8800	
	Contact email: Brendan.ONeil@maine.gov	
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.	

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors		
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: STATE OF MAINE v. PURDUE PHARMA L.P., PURDUE PHARMA INC., RICHARD SACKLER, JONATHAN SACKLER, MORTIMER D.A. SACKLER and KATHE SACKLER	
	Case Number: CV-19-112	
	Court Name: Kennebec County Superior Court	

Date the Complaint was filed: June 3, 2019	
Was the Complaint sealed at filing? Yes	
If so, does the Complaint remain under seal? Yes	
Causes of action asserted in the Complaint: <ol style="list-style-type: none"> 1. FIRST CAUSE OF ACTION (VIOLATIONS OF THE UNFAIR TRADE PRACTICES ACT, 5 M.R.S. § 207) DECEPTION COMMITTED BY PURDUE PHARMA INC AND PURDUE PHARMA L.P. 2. SECOND CAUSE OF ACTION (VIOLATION OF THE UNFAIR TRADE PRACTICES ACT, (5 M.R.S. § 207) UNFAIRNESS COMMITTED BY PURDUE PHARMA INC AND PURDUE PHARMA L.P., 3. THIRD CAUSE OF ACTION (VIOLATIONS OF THE UNFAIR TRADE PRACTICES ACT, 5 M.R.S. § 207) DECEPTION COMMITTED BY RICHARD SACKLER, JONATHAN SACKLER, MORTIMER SACKLER AND KATHE SACKLER 	
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	Public Nuisance
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$14,913,000,000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

Aaron M. Frey
Attorney General for the State of Maine

By: /s/ Brendan F.X. O'Neil
Brendan F.X. O'Neil
Maine Bar #9900
Assistant Attorney General
Maine Office of Attorney General
6 State House Station
Augusta, ME 04333
Telephone: (207) 626-8800

Schedule 10.21 - Maryland

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above and to provide information specific to that of the Claimant.

In addition to the claims set forth in the Consolidated Claim, the State of Maryland asserts (1) claims for damages and other relief of its residents and subdivisions arising under the Maryland Consumer Protection Act and the common law of Maryland; (2) claims arising from Debtors’ illegal conduct in the marketing or sale of Debtors’ opioids from the time Debtors first sold them in Maryland; (3) claims for civil penalties, restitution, disgorgement, and damages arising from Debtors’ marketing, sale, and promotion of opioids from their locations in or near Abingdon, Maryland, and from locations in Baltimore, Rockville, Bethesda, and Silver Spring, Maryland and surrounding areas where Debtors managed, promoted, orchestrated, and carried out their unlawful schemes; (4) claims arising from Debtors’ engagement in unlawful conduct in connection with the American Pain Foundation, formerly located in Baltimore, Maryland.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Maryland
2. Where should notices to the Claimant be sent?	Name: Brian T. Edmunds, Assistant Attorney General
	Address: 200 St. Paul Place
	City: Baltimore State: MD ZIP Code: 21202
	Contact phone: (410) 576-6300
	Contact email: bedmunds@oag.state.md.us
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: Consumer Protection Division v. Purdue Pharma, L.P, et al.
	Case Number: CPD No. 19-023311366 ; OAH No. OAG-CPD-4-19-23474
	Court Name: The Consumer Protection Division of the Office of the Attorney General of Maryland (referred to Maryland Office of Administrative Hearings for initial decision).
	Date the Complaint was filed: May 30, 2019
	Was the Complaint sealed at filing? Yes
	If so, does the Complaint remain under seal? Yes, partly.
Causes of action asserted in the Complaint: 1. Violations of the Maryland Consumer Protection Act	
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	1. Common Law Public Nuisance 2. Common Law Negligence 3. Common Law Negligent Misrepresentation 4. Common Law Fraud 5. False Claims Act 6. False Health Claims Act 7. Maryland Controlled Dangerous Substances Act Violations 8. Contempt 9. Common Law Breach of Contract 10. Common Law Unjust Enrichment
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$49,145,000,000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

BRIAN E. FROSH
Attorney General of Maryland

By: /s/ Brian T. Edmunds
Brian T. Edmunds
Assistant Attorney General
Office of the Attorney General
200 St. Paul Place
Baltimore, Maryland 21202
(410) 576-6300

Schedule 10.22 – Massachusetts

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: Commonwealth of Massachusetts
2. Where should notices to the Claimant be sent?	Name: Gillian Feiner
	Address: One Ashburton Place
	City: Boston State: MA ZIP Code: 02108-1598
	Contact phone: (617) 963-2571
	Contact email: gillian.feiner@mass.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors		
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: Commonwealth of Massachusetts v. Purdue Pharma L.P., et al.	
	Case Number: C.A. No. 1884-cv-01808 (BLS2)	
	Court Name: Suffolk County Superior Court	
	Date the Complaint was filed: June 12, 2018	
	Was the Complaint sealed at filing? No	
	If so, does the Complaint remain under seal? N/A	
	Causes of action asserted in the Complaint:	
	1. Unfair and Deceptive Acts and Practices in Violation of G.L. c. 93A § 2 2. Public Nuisance	

5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	1. False Claims in Violation of G.L. c. 12 §§ 5A - 5O 2. False Representations and Bribery in Violation of G.L. c. 118E §§ 40, 41, 44 3. Common law torts
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$90,406,000,000

Part 3: Sign Below

4. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

MAURA T. HEALEY
Attorney General of the Commonwealth of Massachusetts

By: /s/ Gillian Feiner
Gillian Feiner
Senior Enforcement Counsel
One Ashburton Place
Boston, MA 02108-1598
(617) 963-2571

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Schedule 10.23 - Michigan

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Michigan
2. Where should notices to the Claimant be sent?	Name: D.J. Pascoe
	Address: PO Box 30212
	City: Lansing State: MI ZIP Code: 48909
	Contact phone: (517) 335-7626
	Contact email: pascoed1@michigan.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: No Complaint Filed
	Case Number:
	Court Name:
	Date the Complaint was filed:
	Was the Complaint sealed at filing?

If so, does the Complaint remain under seal?	
Causes of action asserted in the Complaint:	
<p>5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:</p> <p>6. Supporting Documentation:</p>	<p>In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.</p>
7. Claim Amount ⁴	\$72,552,000,000

Part 3: Sign Below	
<p>8. The person completing this authorization form must sign and date it.</p>	<p>I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.</p> <p>Executed on: <u>07/30/2020</u></p> <p>By: <u>/s/ D.J. Pascoe</u> D.J. Pascoe Assistant Attorney General PO Box 30212 Lansing, Michigan 48909 517-335-7626 Email: pascoed1@michigan.gov</p>

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Schedule 10.24 – Minnesota

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant			
1. Name of Claimant.	Name: State of Minnesota		
2. Where should notices to the Claimant be sent?	Name: James W. Canaday, Deputy Attorney General		
	Address: 445 Minnesota Street, Suite 1400		
	City: St. Paul	State: MN	ZIP Code: 55101-2130
	Contact phone: (651) 757-1421		
	Contact email: james.canaday@ag.state.mn.us		
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.		

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Minnesota by its Attorney General, Keith Ellison, v. Purdue Pharma L.P. Purdue Pharma, Inc., The Purdue Frederick Company, Inc., Richard Sackler, Kathe Sackler, Mortimer D.A. Sackler, Jonathan Sackler, David Sackler, Ilene Sackler Lefcourt, Beverly Sackler, and Theresa Sackler.
	Case Number: 27-CV-18-10788
	Court Name: Hennepin County District Court, Fourth Judicial District, Minnesota

Date the Complaint was filed: Original Complaint: July 2, 2018. First Amended Complaint: August 5, 2019.	
Was the Complaint sealed at filing? Yes	
If so, does the Complaint remain under seal? No. The original complaint was unsealed on August 29, 2018, and the first amended complaint was publicly filed.	
Causes of action asserted in the Complaint:	
<ol style="list-style-type: none"> 1. Consumer Fraud (Minn. Stat. § 325F.69) 2. Deceptive Trade Practices (Minn. Stat. § 325D.44) 3. False Statements in Advertising (Minn. Stat. § 325F.67) 4. Deceptive Acts Perpetrated Against Senior Citizens and Disabled Persons (Minn. Stat. § 325F.71) 5. Unlawful Trade Practices (Minn. Stat. § 325D.13) 6. Unjust Enrichment 7. Undertaking of Special Duty (Negligence) 8. Public Nuisance 9. Minnesota False Claims Act (Minn. Stat. § 15C.02) 	
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$32,656,000,000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

KEITH ELLISON
Attorney General
State of Minnesota

By: /s/ James W. Canaday
JAMES W. CANADAY
Deputy Attorney General
445 Minnesota Street, Suite 1400
St. Paul, MN 55101-2130
Telephone: (651) 757-1421
james.canaday@ag.state.mn.us

Schedule 10.25 - Mississippi

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Mississippi
2. Where should notices to the Claimant be sent?	Name: Ta’Shia S. Gordon
	Address: P.O. Box 220
	City: Jackson State: MS ZIP Code: 39205
	Contact phone: (601) 359-3070
	Contact email: Tgord@ago.ms.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Mississippi v. Purdue Pharma L.P., et al
	Case Number: G-2015-1814
	Court Name: Chancery Court of Hinds County, Mississippi

Date the Complaint was filed: December 15, 2015	
Was the Complaint sealed at filing? No	
If so, does the Complaint remain under seal? N/A	
Causes of action asserted in the Complaint: <ol style="list-style-type: none"> 1. Violations of Mississippi Medicaid Fraud Control Act, Miss. Code Ann. §§43-13-201, <i>et seq.</i> 2. Fraud 3. Negligent Misrepresentation 4. Unjust Enrichment 5. Public Nuisance 	
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	None
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$22,154,000,000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/20 (mm/dd/yy)

LYNN FITCH
ATTORNEY GENERAL
STATE OF MISSISSIPPI
P.O. BOX 220
JACKSON, MS 39205

By: /s/ Ta'Shia S. Gordon

Ta'Shia S. Gordon
Special Assistant Attorney General
Mississippi Attorney General's Office
Post Office Box 220
Jackson, Mississippi 39205
Telephone: (601) 359-3070
tgord@ago.ms.gov

OF COUNSEL:

John L. Davidson
DAVIDSON BOWIE PLLC
2506 Lakeland Drive, Suite 501
Post Office Box 321405
Flowood, Mississippi 39232
Telephone: (601) 932-0028
Facsimile: (601) 932-0115
jldavidson@dbslawfirm.net

Joe Tatum, MS Bar No. 10308
TATUM WADE, PLLC
124 East Amite Street
Jackson, Mississippi 39201

Tel: (601) 948-7770
Fax: (601) 948-1551
jntatum@aol.com

Schedule 10.26 - Missouri

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Missouri
2. Where should notices to the Claimant be sent?	Name: Amy Haywood, Chief Counsel, Consumer Protection James J. Simeri, Assistant Attorney General
	Address: Post Office Box 861
	City: St. Louis State: MO ZIP Code: 63188
	Contact phone: (314) 340-6816
	Contact email: Amy.Haywood@ago.mo.gov James.Simeri@ago.mo.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.
Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Missouri, ex rel. Eric S. Schmitt v. Purdue Pharma, L.P.
	Case Number: 1722-CC10626
	Court Name: Circuit Court for the City of St. Louis, Missouri

Date the Complaint was filed: **June 21, 2017. On July 24, 2019, Plaintiff filed its first amended petition. Plaintiff's causes of action in its first amended petition are listed below.**

Was the Complaint sealed at filing? **No**

If so, does the Complaint remain under seal? **N/A**

Causes of action asserted in the Complaint:

- 1. Violations of the Missouri Merchandising Practices Act: Deception**
- 2. Violations of the Missouri Merchandising Practices Act: Fraud and Fraudulent Misrepresentations Against All Defendants**
- 3. Violations of the Missouri Merchandising Practices Act: False Pretense**
- 4. Violations of the Missouri Merchandising Practices Act: Misrepresentation**
- 5. Violations of the Missouri Merchandising Practices Act: Lack of Reasonable Basis for Claims of Performance (15 CSR 60-7.040)**
- 6. Violations of the Missouri Merchandising Practices Act: Unfair Practices**
- 7. Violations of the Missouri Merchandising Practices Act: Concealment, Suppression, and Omission of Material Facts**
- 8. Violations of the Missouri Merchandising Practices Act: Unlawful "Half-Truths" (15 CSR 60-9.090)**
- 9. Violations of §§ 191.900–191.914, RSMo**
- 10. Public Nuisance**
- 11. Unjust Enrichment – Payment for Opioids**
- 12. Unjust Enrichment – Performance of a Duty to the Public**

5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:

6. Supporting Documentation: In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.

7. Claim Amount⁴ **\$31,860,000,000**

Part 3: Sign Below

8. The person completing this authorization form must sign and date it. I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/20 (mm/dd/yy)

ERIC S. SCHMITT
Attorney General for the State of Missouri

By: /s/ Amy Haywood
Amy Haywood
Chief Counsel, Consumer Protection
James J. Simeri
Assistant Attorney General
Post Office Box 861
St. Louis, MO 63188
Tel: (314) 340-6816
Fax: (314) 340-7957
Amy.Haywood@ago.mo.gov
James.Simeri@ago.mo.gov

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Schedule 10.27 - Montana

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Montana
2. Where should notices to the Claimant be sent?	Name: Mark Mattioli
	Address: Post Office Box 200151
	City: Helena State: Montana ZIP Code: 59620-0151
	Contact phone: 406-444-5791
	Contact email: <u>mmattioli@mt.gov</u>
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Montana v. Purdue Pharma, L.P., Purdue Pharma, Inc., The Purdue Frederick Company, Inc., Rhodes Pharmaceuticals, L.P., and Jane Does 1-10.
	Case Number: ADV-2017-949
	Court Name: Montana First Judicial District Court, Lewis and Clark County.

Date the Complaint was filed: November 30, 2017, First Amended Complaint Filed January 30, 2018	
Was the Complaint sealed at filing? Yes	
If so, does the Complaint remain under seal? Yes	
Causes of action asserted in the Complaint: <ol style="list-style-type: none"> 1. Violations Of The 2007 Consent Judgment; 2. Violations Of The Unfair Trade Practices And Consumer Protection Act, Mont. Code Ann. § 30-14-103, and its implementing regulations; 3. Violations Of The Montana False Claims Act, § 17-8-403; 4. Public Nuisance; 5. Unjust Enrichment; and 6. Punitive Damages. 	
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$9,814,000,000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

Timothy C. Fox
Attorney General of Montana

By: /s/ Mark W. Mattioli
MARK W. MATTIOLI
Chief, Office of Consumer Protection
Montana Department of Justice
P.O. Box 200151
Helena, MT 59620-0151
mmattioli@mt.gov

Schedule 10.28 - Nebraska

In re Purdue Pharma, L.P., et al.

United States Bankruptcy Court

Southern District of New York

Case No.: 19-23649 (RDD)

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Nebraska
2. Where should notices to the Claimant be sent?	Name: Meghan E. Stoppel
	Address: 2115 State Capitol
	City: Lincoln State: NE ZIP Code: 68509-8920
	Contact phone: (402) 471-8920
	Contact email: meghan.stoppel@nebraska.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: No Complaint Filed
	Case Number:
	Court Name:
	Date the Complaint was filed:
	Was the Complaint sealed at filing?
	If so, does the Complaint remain under seal?
	Causes of action asserted in the Complaint:

5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$8,321,000,000

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

Douglas J. Peterson
Attorney General for the State of Nebraska

By: /s/Meghan E. Stoppel
Meghan E. Stoppel
Assistant Attorney General
Chief, Consumer Protection Division
Nebraska Attorney General's Office
2115 State Capitol
Lincoln, NE 68509-8920
(402) 471-2811

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Schedule 10.29 - Nevada

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Nevada
2. Where should notices to the Claimant be sent?	Name: MARK J. KRUEGER
	Address: 100 N. Carson Street
	City: Carson City State: NV ZIP Code: 89701
	Contact phone:
	Contact email: mkrueger@ag.nv.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors		
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State v. McKesson, et al	
	Case Number: A-19-796755-B	
	Court Name: Eighth Judicial District Court, Clark County Nevada	
	Date the Complaint was filed: June 17, 2019	
	Was the Complaint sealed at filing? No	
	If so, does the Complaint remain under seal? N/A	
	Causes of action asserted in the Complaint:	
	<ol style="list-style-type: none"> 1. Violation of NRS 202.480 and common law (public nuisance) 2. Violation of Nevada Deceptive Trade Practices Act (NRS 598.0903 et seq.) 	

	3. Violation of Nevada Racketeering Act (NRS 207.350-.520) 4. Violation of Nevada False Claims Act (NRS 367.010-.250) 5. Negligence (Common Law) 6. Negligence per se (Common Law) 7. Violations of 2007 Consent Judgment
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action: 6. Supporting Documentation:	1. Elder Abuse 2. Fraud In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$28,692,000,000

Part 3: Sign Below	
8. The person completing this authorization form must sign and date it.	<p>I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.</p> <p>Executed on: <u>07/30/2020</u></p> <p>AARON D. FORD NEVADA ATTORNEY GENERAL</p> <p>By: <u>/s/ Mark J. Krueger</u> MARK J. KRUEGER Chief Deputy Attorney General State of Nevada, Office of the Attorney General</p>

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

100 N. Carson Street
Carson City, Nevada 89701
mkrueger@ag.nv.gov

Schedule 10.30- New Hampshire

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of New Hampshire
2. Where should notices to the Claimant be sent?	Name: James T. Boffetti, Associate Attorney General
	Address: 33 Capitol Street
	City: Concord State: NH ZIP Code: 03301
	Contact phone: 603.271.0302
	Contact email: james.boffetti@doj.nh.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.
Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of New Hampshire vs. Purdue Pharma, L.P., Purdue Pharma Inc., and The Purdue Frederick Company
	Case Number: 217-2017-CV-00402
	Court Name: Merrimack County Superior Court, Concord, NH
	Date the Complaint was filed: August 8, 2017
	Was the Complaint sealed at filing? Yes. Redacted and public complaint filed at same time.
	If so, does the Complaint remain under seal? Unredacted complaint remains under seal.

<p>Causes of action asserted in the Complaint:</p> <ol style="list-style-type: none"> 1. NH RSA 358-A Consumer Fraud – Deceptive and Unfair Acts and Practices 2. NH RSA 358-A Consumer Fraud – Unfair Competition 3. NH RSA 167:61-b False Claims – Violations of the Medicaid Fraud and False Claims Act 4. Public Nuisance 5. Fraudulent or Negligent Misrepresentation 	
<p>5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:</p> <p>6. Supporting Documentation:</p>	<p>In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.</p>
<p>7. Claim Amount⁴</p>	<p>\$8,272,000,000</p>

<p>Part 3: Sign Below</p>	
<p>8. The person completing this authorization form must sign and date it.</p>	<p>I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.</p> <p>Executed on: <u>07/30/2020</u> (mm/dd/yy)</p> <p>Jane E. Young Deputy Attorney General for the State of New Hampshire</p> <p>By: <u>/s/ James T. Boffetti</u> James T. Boffetti Associate Attorney General</p>

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

New Hampshire Department of Justice
33 Capitol Street
Concord, NH 03301
602.271.0302
James.boffetti@doj.nh.gov

Schedule 10.31 - New Jersey

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of New Jersey
2. Where should notices to the Claimant be sent?	Name: Lara J. Fogel
	Address: 124 Halsey Street, Fifth Floor
	City: Newark State: NJ ZIP Code: 07101
	Contact phone: (609) 647-9136
	Contact email: Lara.Fogel@law.njoag.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors		
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: Grewal, et al. v. Purdue Pharma, L.P., et al.	
	Case Number: ESX-C-245-17	
	Court Name: Superior Court of New Jersey, Chancery Division, Essex County	
	Date the Complaint was filed: October 31, 2017	
	Was the Complaint sealed at filing? No, but redacted pursuant to Confidentiality Agreements.	
	If so, does the Complaint remain under seal? No, redactions were lifted pursuant to agreement by the parties.	
	Causes of action asserted in the Complaint:	
	1. Deceptions, misrepresentations, and omissions of material facts violations of the Consumer Fraud Act, N.J.S.A. 56:8-2 2. Unconscionable commercial practices violations of the Consumer Fraud Act, N.J.S.A. 56:8-2	

<p>3. Unconscionable commercial practice targeting the elderly violations of the Consumer Fraud Act, N.J.S.A. 56:8-2</p> <p>4. False claims violations of the New Jersey False Claims Act, N.J.S.A. 2A:32C-1</p> <p>5. Public Nuisance</p>	
<p>5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:</p>	
<p>6. Supporting Documentation:</p>	<p>In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.</p>
<p>7. Claim Amount⁴</p>	<p>\$60,526,000,000</p>

Part 3: Sign Below	
<p>8. The person completing this authorization form must sign and date it.</p>	<p>I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.</p> <p>Executed on: <u>07/30/2020</u></p> <p>Gurbir S. Grewal Attorney General for the State of New Jersey</p> <p>By: <u>/s/ Lara J. Fogel</u> Lara J. Fogel 124 Halsey Street, Fifth Floor Newark, New Jersey 07101 (609) 647-9136</p>

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Schedule 10.32 - New Mexico

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant				
1. Name of Claimant.	Name: State of New Mexico			
2. Where should notices to the Claimant be sent?	Name: Brian E. McMath			
	Address: P.O. Drawer 1508			
	City: Santa Fe	State: NM	ZIP Code: 87504-1508	
	Contact phone: (505) 717-3500			
	Contact email: bmcmath@nmag.gov			
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.			

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of New Mexico ex rel. Balderas v. Purdue Pharma, L.P., et al.
	Case Number: No. D-101-CV-2017-02541
	Court Name: First Judicial District Court, County of Santa Fe

Date the Complaint was filed: Sept. 7, 2017 (original), Dec. 21, 2017 (first amended), March 6, 2019 (second amended)	
Was the Complaint sealed at filing? No	
If so, does the Complaint remain under seal? N/A	
Causes of action asserted in the Complaint:	
<ol style="list-style-type: none"> 1. Statutory Public Nuisance, NMSA 1978 § 30-8-8 2. Unfair Trade Practices, NMSA 1978 § 57-12-2 3. Medicaid Fraud, NMSA 1978 § 30-44-7 4. Racketeering, NMSA 1978 § 30-42-1 5. Fraud Against Taxpayers, NMSA 1978 § 44-9-1 6. Negligence 7. Negligence Per Se 8. Conspiracy to Commit Racketeering, NMSA 1978 § 30-42-1 (added 12/21/17) 9. Civil Conspiracy (added 3/6/19) 10. Fraud (added 3/6/19) 11. Unjust Enrichment (added 3/6/19) 	
<ol style="list-style-type: none"> 5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action: 6. Supporting Documentation: 	<ol style="list-style-type: none"> 1. State of New Mexico ex rel. Balderas v. Richard S. Sackler et al., No. D-101-CV-2019-02399 (Sept. 10, 2019) (lawsuit filed against the Sackler Family individuals alleging unfair trade practices, NMSA 1978 § 57-12-2) <p>In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.</p>

7. Claim Amount ⁴	\$17,703,000,000
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Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

Hector H. Balderas
Attorney General for the State of New Mexico

By: /s/ Brian E. McMath
Brian E. McMath
P.O. Drawer 1508
Santa Fe, NM 87504-1508
(505) 717-3500

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Schedule 10.33 – New York

In re Purdue Pharma, L.P., et al.

United States Bankruptcy Court

Southern District of New York

Case No.: 19-23649 (RDD)

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of New York; New York State Department of Financial Services
2. Where should notices to the Claimant be sent?	<u>For State of New York</u>
	Name: M. Umair Khan
	Address: 28 Liberty Street
	City: New York State: NY ZIP Code: 10005
	Contact phone: (212) 416-6685
	Contact email: umair.khan@ag.ny.gov
	<u>For New York State Department of Financial Services:</u>
	Name: Linda Donahue
	Address: One State Street
	City: New York State: NY ZIP Code: 10004
Contact phone: (212) 709-1641	
Contact email: linda.donahue@dfs.ny.gov	
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: The People of the State of New York v. Purdue Pharma L.P., et al.
	Case Number: 400016/2018 (coordinated docket: 40000/2017)
	Court Name: Supreme Court for the State of New York, County of Suffolk
	Date the Complaint was filed:
	<ul style="list-style-type: none"> ○ Original Complaint: August 14, 2018 ○ First Amended Complaint: March 28, 2019
	Was the Complaint sealed at filing?
	<ul style="list-style-type: none"> ○ Original Complaint: No ○ First Amended Complaint: Yes; redacted version was publicly filed
	If so, does the Complaint remain under seal? FAC – yes; a mostly unredacted version is publicly filed.
	Causes of action asserted in the Complaint: (only as against Purdue, the Sacklers, and the “Sackler Entities”)
	<ol style="list-style-type: none"> 1. Public Nuisance (excluding Sackler Entities) 2. False Claims Act: Violation of State Finance Law § 189(a)-(c) (excluding Sackler entities) 3. N.Y. Social Services Law § 145-b (excluding Sackler Entities) 4. General Business Law § 349 (excluding Sackler entities) 5. General Business Law § 350 (excluding Sackler entities) 6. Repeated and Persistent Fraud in Violation of N.Y. Executive Law § 63(12) (excluding Sackler Entities) 7. Repeated and Persistent Illegality in Violation of N.Y. Executive Law § 63(12) (excluding Sackler Entities) 8. Common-Law Fraud (excluding Sackler Entities)

	<p>9. Common-Law Gross Negligence (excluding Sackler Entities)</p> <p>10. Common-Law Willful Misconduct (excluding Sackler Entities)</p> <p>11. Unjust Enrichment</p> <p>12. Intentionally Fraudulent Conveyances in Violation of Debtor and Creditor Law § 276</p> <p>13. Constructively Fraudulent Conveyances in Violation of Debtor and Creditor Law §§ 273, 273-a, 274, and/or 275</p>
<p>5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:</p>	<p>The New York State Department of Financial Services (“DFS”), as the sole insurance regulator in the State of New York, ensures the safety and soundness of New York’s insurance industry and promotes the reduction and elimination of fraud, criminal abuse, and unethical conduct with respect to insurance institutions and their customers. DFS’s Superintendent has the authority to conduct investigations, to bring enforcement proceedings, and to levy monetary penalties against parties who have engaged in wrongdoing in violation of the relevant laws and regulations. Pursuant to Section 403 of the New York Insurance Law, the DFS Superintendent has the authority to levy civil penalties upon any person who has committed a “fraudulent insurance act,” as defined in Section 176.05 of the New York Penal Law. Under Section 403(c) of the New York Insurance Law, the DFS Superintendent is empowered to levy a civil penalty up to \$5,000 and the amount of the claim, for each violation. In addition, the DFS Superintendent has the authority to levy civil penalties upon any person who has committed any intentional fraud or intentional misrepresentation of a material fact with respect to a financial product or service, including commercial health insurance plans up to \$5,000 per offense pursuant to Section 408(a)(1)(A) of the New York Financial Services Law.</p> <p>The Debtors falsely, fraudulently, and misleadingly marketed and promoted the safety and efficacy of opioids, which led to hundreds of thousands of fraudulent prescriptions, each one of which constitutes violations of the New York Insurance Law and Financial Services Law. DFS has not yet served a final Statement of Charges and Notice of Hearing to commence an administrative proceeding against Debtors, and its claims are unliquidated.</p> <p>For further information on DFS’s claims, see the attached draft DFS Statement of Charges and Notice of Hearing.</p>

6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$165,773,000,000

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

LETITIA JAMES

Attorney General for the State of New York

By: /s/ M. Umair Khan

M. Umair Khan

Senior Advisor and Special Counsel

28 Liberty Street

New York, NY 10005

(212) 416-6685

LINDA LACEWELL

Superintendent, New York State Department of Financial Services

By: /s/ Kevin R. Puvalowski

KEVIN R. PUVALOWSKI

Senior Deputy Superintendent

Consumer Protection and Financial Enforcement

One State Street

New York, New York 10004

(212) 709-5578

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.



NEW YORK STATE
DEPARTMENT OF FINANCIAL SERVICES
ONE STATE STREET
NEW YORK, NEW YORK 10004

-----X

In the Matter of:

PURDUE PHARMA L.P.,
PURDUE PHARMA INC.,
PURDUE HOLDINGS L.P.,
THE PURDUE FREDERICK COMPANY, INC.,
RICHARD SACKLER,
KATHE SACKLER,
ESTATE OF JONATHAN SACKLER,
ILENE SACKLER LEFCOURT,
MORTIMER D.A. SACKLER,
ESTATE OF BEVERLY SACKLER,
THERESA SACKLER, and
DAVID SACKLER,

No. 2020-####-#

Respondents.

-----X

DRAFT STATEMENT OF CHARGES AND NOTICE OF HEARING

TO THE ABOVE-NAMED RESPONDENTS:

PLEASE TAKE NOTICE that a hearing will be held at the office of the New York State Department of Financial Services, One State Street, New York, New York 10004, 6th Floor, on the ____ day of ___, 2020, at 10:00 a.m., and continuing thereafter day to day, as determined by the Department, before a Hearing Officer to be appointed by the Superintendent of Financial Services, to determine whether RESPONDENTS have violated Section 403 of the New York Insurance Law and/or Section 408(a)(1)(A) of the New York Financial Services Law and

whether civil monetary penalties shall be imposed and other appropriate relief granted as a result of such violation(s).

I.

OVERVIEW

1. The opioid epidemic has caused a devastating public health crisis in the United States. The human cost of that crisis has been profound, with more than 400,000 deaths linked to opioid-related drug abuse since 1997. The financial cost has been debilitating, with costs to the U.S. economy estimated in the hundreds of billions of dollars.

2. The crisis was created and fueled, in part, by greed. Entities and individuals at multiple levels of the opioid supply chain enjoyed huge profits as the drugs they sold both destroyed lives and dramatically increased the cost of health care in America.

3. These entities and individuals were well aware that opioids were highly addictive and subject to abuse, and, as a result, were generally appropriate only for cancer pain, short-term pain relief (such as immediately after surgery or trauma) or palliative (end of life) care.

4. Despite knowing that the long-term use of opioids for chronic pain treatment could lead to addiction and abuse, these entities and individuals took steps to expand the market for their pills into areas of treatment that they knew to be unsafe.

5. To do so, among many other things, the entities and individuals misrepresented the safety and efficacy of their drugs in marketing materials and in communications to healthcare professionals. They downplayed the addictive nature of their products and actively promoted a discredited theory of “pseudoaddiction.” They paid prominent doctors, advocacy groups, and professional associations vast sums of money to promote the use of opioids in areas that were not

medically responsible. Moreover, they chose to look the other way when faced with blatant signs of over-prescription, abuse, and illegal diversion.

6. These efforts to expand the opioid market were fabulously successful. Despite the fact that there were no material changes in the circumstances under which opioids were medically indicated, the sales of opioids increased dramatically.

7. The consequences of this explosion of opioids on the market were as predictable as they were tragic. In every community, in every walk of life, Americans became addicted to these powerful drugs. When they could no longer obtain “legitimate” prescriptions from their doctor, they often turned to illicit sources, including “pill mills” where unscrupulous healthcare providers would hand out opioid prescriptions, for cash, on demand. And when the opioid medications themselves became too expensive or too difficult to obtain, many victims turned to street-level drugs to feed their habit, including heroin and fentanyl-laced narcotics.

8. This addiction cycle has not only destroyed countless families and lives, but it has also resulted in a tremendous increase in healthcare costs, including claims paid by commercial health insurers. In addition to billions of dollars in unnecessary opioid prescriptions, healthcare costs related to treatment of opioid addiction and abuse have skyrocketed. From 2007 to 2014, for example, private insurance claims related to opioid dependence diagnoses rose more than 3000% nationally, and nearly 500% in New York State. Over just the past 10 years, the dramatic rise in additional claims paid by commercial health insurers in the State of New York as a direct result of the opioid crisis led to, in turn, New York consumers of commercial health insurance overpaying an estimated \$1.8 billion in premiums.

9. One study has estimated that opioid overdose patients add approximately \$11.3 billion to the U.S. healthcare system each year — or approximately 1% of all expenditures. In

2015, the Centers for Disease Control and Prevention (“CDC”) estimated that healthcare costs directly related to opioid abuse on the whole totaled \$28 billion in that year alone. That year, the average costs for private payors for a patient with an opioid abuse or dependence diagnosis was more than 550% higher — an increase of almost \$16,000 — than the average per-patient cost based on all patients’ claims.

10. These costs have ultimately been handed down to consumers who have been made to pay higher premiums for health insurance products.

11. Indeed, New Yorkers spend more on average than the rest of the country on health insurance. Per-person spending on health care was about 3% higher than the national average in 2013. By 2017 that gap increased to approximately 12%. The average annual rate of growth in per-person spending from 2013 to 2017 was 6.2% in New York, compared with a 3.9% national rate. A large degree of this increase in spending has been due to prescription drugs, whose costs constitute a high proportion of this growth. Indeed, compared with other categories of healthcare costs, prescription drugs have experienced the largest spending growth in New York as well as nationally, with rates of 40% and 29% respectively.

12. This enforcement action seeks to make Respondents accountable for the harm caused by the opioid crisis and incurred by the New York insurance industry and consumers of private commercial health insurance policies.

II.

THE ROLE AND JURISDICTION OF THE DEPARTMENT OF FINANCIAL SERVICES

13. The New York State Department of Financial Services (the “Department”) is the sole insurance regulator in the State of New York, including with respect to commercial health insurance plans through which more than five million New Yorkers obtain their vital health

insurance coverage. As such, among other things, the Department licenses health insurance companies, conducts examinations thereof, and reviews and approves insurance rates.

14. The Superintendent of the Department also bears the responsibility of ensuring the safety and soundness of New York’s insurance industry and to promote the reduction and elimination of fraud, criminal abuse, and unethical conduct with respect to insurance institutions and their customers.

15. The Superintendent has the authority to conduct investigations, to bring enforcement proceedings, and to levy monetary penalties against parties who have engaged in wrongdoing in violation of the relevant laws and regulations.

16. In particular, pursuant to Section 403 of the New York Insurance Law, the Superintendent has the authority to levy civil penalties upon any person who has committed a fraudulent insurance act, as defined in Section 176.05 of the New York Penal Law, up to \$5,000 and the amount of the claim — per fraudulent claim.

17. Under New York Penal Law Section 176.05, a fraudulent insurance act is an act “committed by any person who, knowingly and with intent to defraud presents [or] causes to be presented . . . to or by an insurer . . . or any agent thereof: . . . a claim for payment, services or other benefit pursuant to [a health insurance] policy, contract or plan that he or she knows to: (a) contain materially false information concerning any material fact thereto; or (b) conceal, for the purpose of misleading, information concerning any fact material thereto”

18. In addition, under Sections 404 and 408(a)(1)(A) of the New York Financial Services Law, the Superintendent has the authority to levy civil penalties upon any person who has committed any intentional fraud or intentional misrepresentation of a material fact with respect to a financial product or service or involving any person offering to provide or providing

financial products or services, up to \$5,000 per offense. “Financial product or service” includes, among other things, any financial product or service provided by person regulated by the Superintendent under the New York Insurance Law. This includes commercial health insurance plans.

III.

RESPONDENTS

19. Respondent Purdue Pharma L.P. is a limited partnership organized under the laws of Delaware. Its principal place of business is Stamford, Connecticut.

20. Respondent Purdue Pharma Inc. is a New York corporation and is the general partner of, and ultimately controls, Purdue Pharma L.P. Its principal place of business is Stamford, Connecticut.

21. Respondent Purdue Holdings L.P. is a Delaware limited partnership and wholly owns the limited partnership interest in Purdue Pharma L.P.

22. Respondent The Purdue Frederick Company, Inc. is a New York corporation. Its principal place of business is Stamford, Connecticut.

23. The above-identified Respondents and their DEA registrant subsidiaries and affiliates are collectively referred to as “Purdue.”

24. Purdue was bought in 1952 by the three Sackler brothers: Arthur, Mortimer, and Raymond. It remains principally owned by the descendants of Mortimer (“Mortimer Sackler Sr.”) and Raymond Sackler.

25. The term “Sackler Families” includes members of the Sackler family who sat on Purdue’s board of directors and includes Richard Sackler, Kathe Sackler, Jonathan Sackler, Ilene Sackler Lefcourt, Mortimer D.A. Sackler, Beverly Sackler, Theresa Sackler, and David Sackler.

26. Richard Sackler is the son of Raymond and Beverly Sackler. He was president of Purdue from 1999-2003 and co-chairman of the board from 2003 to 2014. He was a board member from around 1990 until 2018.

27. Kathe Sackler is the daughter of Mortimer Sackler Sr. She served as a vice president of Purdue from 1999-2003 and a board member from around 1990 until 2019.

28. Jonathan Sackler is the son of Raymond and Beverly Sackler. He served as a vice president of Purdue from 1999-2003 and a board member from around 1990 until 2019.

29. Ilene Sackler Lefcourt is the daughter of Mortimer Sackler Sr. She served as a board member of Purdue from around 1990 until 2019.

30. Mortimer D.A. Sackler is the son of Mortimer Sackler Sr. He served as vice president from 1999-2003 and a board member of Purdue from around 1995 until 2019.

31. Beverly Sackler was the wife of Raymond Sackler and mother of Richard and Jonathan Sackler. She served as a board member from around 1995 until 2017 and died in December 2019.

32. Theresa Sackler is the widow of Mortimer Sackler Sr. She served as a board member of Purdue from around 1995 until 2018.

33. David Sackler is the son of Richard Sackler and served as a board member from 2012 to 2018.

34. Purdue manufactured, marketed, sold, and/or distributed the following opioid medications in New York: OxyContin, MS Contin, Butrans, Hysingla ER, Targiniq ER, Dilaudid, Dilaudid-HP, Palladone, and Ryzolt.

35. For years, Purdue manufactured opioid pills for the U.S. market, including the New York market. According to data from the Automation of Reports and Consolidated Orders

System (“ARCOS”), a database maintained by the U.S. Drug Enforcement Administration (“DEA”) that tracks the movement of controlled substances around the nation, Purdue manufactured approximately 3.4% of the opioid pills that flooded New York from 2006 to 2014. These pills accounted for approximately 6.4% of the total morphine milligram equivalents (“MME”) introduced to New York via opioid products during this period.

IV.

FACTUAL ALLEGATIONS

A. Introduction

36. Opioids are a class of drugs that includes narcotic painkillers derived from opium or that mimic opium’s effects. Older opium-derived drugs such as morphine, codeine, and heroin, are often referred to as “opiates”; newer, mostly synthetic drugs like oxycodone, hydrocodone, and fentanyl are distinguished from opiates and will be referred to herein as “opioids.”

37. Like heroin and morphine, prescription opioids work by binding to receptors in the brain and on the spinal cord, thereby dampening the perception of pain. At sufficient doses, opioids slow the user’s breathing and can cause respiratory depression and death.

38. Prior to the mid- to late-1990s, medical professionals generally viewed opioids as dangerous and therefore limited their use. As a result, opioids were primarily prescribed only to treat short-term pain in controlled settings (such as immediate post-surgical or trauma pain in hospitals), and for acute cancer pain and palliative (end of life) care.

39. There were no long-term studies demonstrating the safety and efficacy of opioids for long-term treatment of chronic pain. Indeed, no studies examined the use of opioids beyond 16 weeks, and there was no evidence that opioids improved patients’ pain management or

function in the long term. To the contrary, studies demonstrated that opioids were less effective than non-addictive analgesic alternatives and often resulted in the poor outcomes of opioid tolerance (*i.e.*, requiring ever-greater doses to get the same pain-relieving effect), diminished function, increased side effects, and addiction and abuse.

40. With the creation of powerful synthetic opioids in the mid-to late-1990s, however, opioid manufacturers and others embarked upon a deliberately false and misleading marketing and promotional campaign to change the perception of the danger and addictive quality of opioids. The goal of this campaign was to convince healthcare professionals to embrace opioids as safe and proper treatments for a much larger group of chronic pain sufferers, such as patients suffering from chronic back pain, arthritis, and migraine headaches, to name a few.

41. To accomplish this shift, opioid manufacturers, including the Purdue Respondents, spent vast sums of money on a variety of false and misleading marketing and promotional activities. For example, among other things, the activities included developing and disseminating seemingly truthful scientific and educational and marketing materials that misrepresented the safety and efficacy of long-term use of opioids; paying sales representatives to deliver misleading messages about opioids to healthcare professionals; recruiting and funding healthcare providers to draft misleading studies and present deceptive and misleading continuing medical education programs; and helping develop and fund seemingly independent, objective advocacy groups, herein called front groups, that themselves developed false and misleading educational materials and treatment guidelines that promoted long-term opioid use.

42. These efforts were designed to convince healthcare professionals and patients, falsely, that the benefits of using opioids to treat chronic pain outweighed the risks and that opioids could be safely used by most patients. Such efforts featured numerous material

misrepresentations about opioids. Among other things, these efforts repeatedly overstated the benefits of long-term opioid treatment and failed to disclose the lack of evidence supporting such use; downplayed the risks of negative outcomes for patients, including the risk of addiction and abuse and the difficulty of withdrawal; falsely masked the signs of addiction by calling them “pseudoaddiction”; and overstated opioids’ success versus other, less dangerous pain relief alternatives.

43. These false and misleading marketing efforts were both ubiquitous and highly successful. The deception tainted nearly every source that healthcare professionals could rely upon for information about the safety and efficacy of opioids for chronic pain relief, and the institutional and public perception of the standard of care for treating patients with chronic pain changed.

44. As a result, the prescription of opioid medications dramatically increased over time. Opioid prescriptions doubled between 1980 and 2000 and just kept rising thereafter. A study of 7.8 million doctor visits found that prescriptions for pain increased by 73% between 2000 and 2010, for example, even though the number of office visits in which patients complained of pain did not change and the prescribing of non-opioid pain medications actually decreased during that period. Opioid prescriptions peaked in or around 2012, when more than 280 million prescriptions were issued (roughly a one-month supply for every American adult), and opioid prescription levels have remained far higher than historical norms through the present.

45. But for the misleading information disseminated by the opioid manufacturers, including the Purdue Respondents, doctors would not have, in most instances, prescribed opioids as medically necessary or reasonably required to treat chronic pain.

46. It is well known that a strong correlation exists between opioid use and abuse, and the sharp increase in opioid use caused by the opioid manufacturers' actions, including those of the Purdue Respondents, predictably led directly to a dramatic increase in opioid abuse, addiction, overdoses, and death. The CDC estimates that more than 400,000 deaths in the United States can be attributed to opioid-related drug abuse since 1997. Moreover, mortality statistics are just a small part of the picture: according to data from 2009, for every overdose death, there were nine abuse treatment admissions, 30 emergency room visits, and 118 people with addiction or abuse problems.

47. Moreover, opioid abuse can rapidly evolve from prescribed opioid pain management to street-level heroin and fentanyl abuse. For many, the cycle begins with a "legitimate" opioid prescription for chronic pain management. Some patients become addicted and request more opioids from their doctors, who eventually cut them off. Many addicts then doctor shop for additional prescriptions, and, when those sources run out, they turn to the streets for illicit opioids and other narcotics, including heroin and street-level fentanyl. It is estimated that a majority of heroin users began by using prescription opioids.

48. In sum, the causal chain is straightforward. The intentional falsehoods of the opioid manufacturers, including the Purdue Respondents, about the safety and efficacy of opioids were successful in creating over-prescription of opioids on a massive scale. Then, that massive over-prescription resulted in an epidemic of abuse and addiction of opioids that itself has caused devastation in human and financial terms.

49. This chain of events caused tremendous financial harm to New York's commercial health insurance companies and the consumers who pay their premiums. New York commercial health plans have paid millions of claims for opioid prescriptions that were not

medically necessary, legitimate, and/or appropriate, and to cover treatment for opioid-related abuse such as overdose, addiction counseling, emergency room visits, and anti-overdose medication that resulted from the opioid epidemic. In the past 10 years, New York consumers of commercial health insurance have overpaid an estimated \$1.8 billion in premiums as a result of the opioid epidemic.

B. Specific Allegations Concerning Purdue Respondents

50. In 1972, Purdue developed a specific formulation of drug that provides an extended (continuous) release of opiates into the body. Purdue named this the “Contin” system.

51. The Sackler Families, through a U.K. affiliate, acquired a Scottish drug producer that had developed a sustained-release technology suitable for morphine. Purdue introduced this new extended-release morphine drug into the market in 1984. Known as MS Contin, it quickly became a best seller, principally for managing cancer and end-of-life pain.

52. With MS Contin’s patent set to expire in the late 1990s, however, the Sackler Families searched for a drug to replace it. Richard Sackler in particular had grand ambitions for the family business; according to a long-time Purdue sales representative, Richard wanted Purdue to be big — “I mean really big,” and he believed Purdue should develop another use for its “Contin” timed-release system.

53. In 1990, Purdue’s vice president of clinical research, Robert Kaiko, sent a memo to Richard Sackler and other executives recommending that the company work on a pill containing oxycodone. Thereafter, Purdue developed “OxyContin,” a version of oxycodone in combination with a time-release formula similar to MS Contin, and available in doses far in excess of other prescription opioids. Purdue released OxyContin in 1996 as a pain relief drug alternative to morphine and MS Contin, which were traditionally associated with end-of-life

care. By contrast, Purdue explicitly targeted Oxycontin for use in chronic but non-life-threatening conditions.

54. Upon information and belief, despite OxyContin's potency and abuse potential, Purdue stated in its labelling for OxyContin that "[d]elayed absorption as provided by OxyContin tablets, is believed to reduce the abuse liability of a drug."

55. Purdue had no data or research basis for this claim, and the FDA ultimately pulled this language from OxyContin's label in 2001. Nonetheless, as set forth in detail below, Purdue made reduced risk of addiction and abuse the cornerstone of its marketing efforts of the drug that Purdue intended to make historic. Richard Sackler's 1996 newsletter about OxyContin's launch clearly stated Purdue's intention: "OxyContin Tablets is the most important product launch in the company's history, and like the Blizzard of '96, will become a part of our common and individual history."

56. Purdue employed many tactics, as discussed further below, to make OxyContin a blockbuster drug by misleadingly promoting its use beyond cancer and palliative care. Importantly, to change the long-standing medical norm of prescribing opioids only for cancer and palliative care, Purdue engaged in an educational blitz around the time OxyContin was released to the market through July 2002, funding through direct sponsorship or financial grants 20,000 pain education programs on the undertreatment of pain, which promoted the ideas that addiction was rare and that "opiophobia" — the fear of prescribing because of concerns about addiction — was a leading cause of undertreating pain.

57. OxyContin was a massive success from the start, with its sales increasing exponentially from each year to the next. From its launch in June 1996 through 2001, Purdue made an estimated \$2.8 billion in revenue from OxyContin sales.

Purdue's Deceptive Marketing

58. Beginning in 1997, Purdue produced numerous marketing brochures, pamphlets, and websites advocating the use of OxyContin as well as opioids in general. Purdue targeted OxyContin, in contrast to its predecessor MS Contin, specifically to pain patients without cancer or similar terminal conditions. “When we launched OxyContin,” future Purdue president Michael Friedman wrote in a 1997 email to Richard Sackler, “we intentionally avoided a promotional campaign that would link OxyContin to cancer pain.” The reasoning behind this strategy was to make the drug “less threatening” to doctors who could be wary of using such a strong drug for non-terminal patients. Indeed, Friedman explained, OxyContin had a “personality” that Purdue used “to differentiate . . . from MS Contin and Duragesic” and which “led to much non-malignant business.”

59. Purdue marketing materials targeted both doctors and patients and placed heavy emphasis on advocating prescriptions for the following groups: the elderly, veterans, and the so-called “opioid-naïve.” Upon information and belief, this last group — patients who had never taken an opiate before — were labeled by Purdue as somehow more protected from the dangers of addiction, and to that end Purdue touted OxyContin as a “first-line drug” for opioid-naïve patients.

60. A key selling point for OxyContin was Purdue’s claim that the drug lasted 12 hours, meaning that patients would only need to take two pills daily. Upon information and belief, however, Purdue’s own research on OxyContin questioned this assertion. A 1989 Puerto Rico study found a recurrence of post-surgical pain well before 12 hours, and as many as half of the study participants given OxyContin re-medicated before the 12 hours were up. In 2008, the

FDA found that a “substantial number” of chronic pain patients taking OxyContin experience “end-of-dose failure” with little or no pain relief at the end of the dosing period.

61. Another marketing ploy Purdue used was to sell OxyContin as a “non-narcotic” medication; in 1997, a Purdue staff member wrote to Richard Sackler stating that this would allow for “a vast increase in market potential.” Even Robert Kaiko, OxyContin’s primary inventor, thought that this was a dangerous idea. He wrote an email to Richard Sackler in February 1997 relaying that he was “very concerned,” stating, “I don’t believe we have a sufficiently strong case to argue OxyContin has minimal or no abuse liability.” He noted that “oxycodone containing products are still among the most abused opioids in the U.S.,” and predicted that “if OxyContin is uncontrolled . . . it is highly likely that it will eventually be abused.” Indeed, also in 1997 in a memo, Purdue executive and future CEO John Stewart made the Sacklers and Purdue aware of the dangerous consequences for patients when “high doses of an opioid are used for long periods of time.”

62. Undeterred, Richard Sackler attempted to have Purdue sell OxyContin as a non-narcotic in Germany, where its Federal Institute for Drugs and Medical Devices (BFARM) had scheduled the drug similarly to the narcotic morphine. He wrote to Purdue staff that the company had “a lot of use data in the US with very, very, very few ADE’s [adverse drug events] [sic]. We can run another long-term trial to get more data. And if the abuse potential is equal or lower than other non-scheduled drugs, would BFARM unschedule it?” (emphasis removed) Paul Goldenheim, Purdue’s medical director, admitted to Sackler in reply that, in actuality, “[w]e do not have any abuse liability studies. I think this is a dead end.”

63. Still, Purdue continued to downplay risks of addiction. For example, in a 1998 marketing letter sent to doctors stated that “one of the greatest obstacles to effective pain

management with opioids is the perceived fear of addiction. The risk of addiction to opioids in clinical care has been greatly exaggerated” The letter went on to advise doctors to “address” patients’ addiction fears before prescribing opioids, so as to avoid “nonuse or improper use by patients.”

64. From the outset, Purdue was extremely invested in the idea that doctors should simply increase the dosage of a pill rather than prescribe pills at shorter intervals; this was despite the fact that for many patients, OxyContin did not last for the promised 12 hours, a fact that, upon information and belief, Purdue knew as early as 1989. In a 1996 internal memo, a Purdue regional manager told sales representatives that they should “convince the physician that there is no need” to prescribe at shorter intervals — rather, an easier solution was to prescribe higher doses of the drug. He instructed: “[t]o deal with this, it is important that the representative discusses with the physician that there is not [an] upward limit, asking if there are any reservations in using a dose of 240mg-320mg of OxyContin.” The idea that OxyContin could even have a “ceiling effect” was to Richard Sackler a “critical misconception” that Purdue needed to “smash.”

65. Purdue also had a strategy to deal with any negative publicity concerning OxyContin’s high addiction potential — blaming the drug’s victims. In a 2001 email, Richard Sackler told an employee “to hammer on the abusers in every way possible. They are the culprits and the problem. They are reckless criminals.” To that end, Sackler wrote in response to negative coverage from *Time* magazine that its reporting was not “balanced,” and moreover that the increasing number of deaths were the fault of “the drug addicts.” Sackler vowed to “stay the course and speak out for people in pain — who far outnumber the drug addicts abusing our products.”

66. By 2000, OxyContin became the most prescribed Schedule II narcotic in the United States. That same year, the FDA issued a warning letter to Purdue requesting that it stop claiming that OxyContin could “be used for the treatment of moderate to severe osteoarthritis pain” — a suggestion that was “unsubstantiated, and consequently, misleading.” In addition, the FDA took issue with the specific marketing to elderly patients, explaining that “promotional materials are misleading if they promote a drug in a selected class of patients without presenting risk information especially applicable to that selected class of patients.” Elderly opioid users are at a heightened risk of respiratory depression, and Purdue did not disclose this in ads displaying an elderly person with the headline, “Proven Effective in Arthritis Pain.” The FDA thus ordered Purdue to “immediately discontinue the use” of any advertisements that contained this kind of claim without disclosing risks.

Involvement of Individual Sackler Respondents

67. The Sackler family, as owners of Purdue and direct beneficiaries of its profits, had a substantial interest to make sure that the company’s sales were as high as they possibly could be. As opioid abuse, addiction, and related deaths continued to rise, the Sackler board members would routinely pay their family hundreds of millions of dollars, eventually making their family as much as \$13 billion from Purdue’s sale of OxyContin, from 2007-2018. Indeed, in a 2010 “10 year plan,” the Sacklers outlined a payment schedule in which the family would earn at least \$700 million annually from 2010 to 2020.

68. Upon information and belief, Sackler Family board members actively participated in executive discussions about the company’s sales and marketing strategies, as well as the increasing concerns over opioid abuse, addiction, and related deaths. Upon information and

belief, as an example, they held a “Beneficiaries Meeting” in 2013 where Purdue staff reported directly to the Sackler family on their efforts to sell opioids.

69. Upon information and belief, the Sackler Family board members, four of whom — Richard, Kathe, Mortimer, and Jonathan — were senior executives until 2003, also selected Purdue executives particularly for their loyalty to the Sackler family. In fact, upon information and belief, when current CEO Craig Landau lobbied for his job in 2017, he acknowledged in his presentation that “the Board of Directors [would be] serving as the ‘de facto’ CEO.”

70. Upon information and belief, individual Sackler Family board members either together, individually, or in subgroups participated in non-board executive meetings, emailed Purdue staff about sales and marketing initiatives, approved OxyContin discount programs, and sought to develop new treatment drugs for the opioid crisis that they had in large part instigated. For example, upon information and belief, Kathe Sackler was in charge of Project Tango, a Purdue initiative to sell suboxone, an anti-addiction medication. Furthermore, Richard Sackler received a patent for an opioid treatment medication in 2018.

71. Indeed, when OxyContin was introduced in 1996, Richard Sackler was vice president of sales and, upon information and belief, was the architect of the OxyContin sales strategy, and he continued to encourage aggressive sales tactics of the new drug as President beginning in 1999. Though he stepped down as president in 2003, he continued to ratify Purdue’s sales and marketing strategies as chairman of the board. As late as 2012, upon information and belief, Richard Sackler demanded and was granted a meeting with sales and marketing staff to discuss a plan of getting at least ten thousand OxyContin prescriptions written per week.

72. The individual board members were well aware and knowledgeable about the facts underlying the 2007 guilty plea, discussed below, along with various consent agreements and compliance obligations all aimed at curtailing the false, fraudulent, and misleading representations about the safety and efficacy of its opioids and opioids in general. Despite this knowledge, upon information and belief, the board members continued to approve and ratify the Purdue policies and practices that reinforced and furthered these false, fraudulent, and misleading representations and actions.

Use of Third-Party “Key Opinion Leaders” and “Front Groups”

73. Purdue, along with other opioid manufacturers, extensively cultivated and paid a select circle of doctors they labelled “Key Opinion Leaders” (“KOLs”) to advocate for the widespread prescription of opioids.

74. Perhaps the most well-known KOL sat on the board of directors of two prominent Front Groups, the American Pain Foundation (“APF”) and the American Pain Society (“APS”), the latter of which he was also the president. As a consultant, he received substantial funding from Purdue along with other manufacturers in exchange for his promulgation of the use of opioids to prescribers and patients. To this end, he maintained an extensive media presence. For example, he even made a 2010 appearance on the national television show *Good Morning America*, in which he stated that addiction “when treating pain, is distinctly uncommon.” Furthermore, he declared, if a patient had no “personal history” or “history in the family of substance abuse, and [did] not have a very major psychiatric disorder,” doctors could be “very assured that that person is not going to become addicted.”

75. This KOL has since recanted his previous assertions on behalf of the opioid industry, admitting in 2010 that he “gave innumerable lectures in the late 1980s and 90s

addiction that weren't true," and that [d]ata about the effectiveness of opioids does not exist." He also stated: "Did I teach about pain management, specifically about opioid therapy, in a way that reflects misinformation? Well . . . I guess I did." He admitted that his promotion of opioids was "pseudoscience."

76. Another KOL, who would later become a senior medical director for Purdue, co-authored a study in 1989 inventing the term "pseudoaddiction," used to describe "the iatrogenic syndrome of abnormal behavior developing as a direct consequence of inadequate pain management." Pseudoaddiction, he declared, was a condition in which the behaviors normally associated with addiction — running out of pills early, asking for higher doses, *etc.* — instead indicated insufficient pain management. The myth of pseudoaddiction was a valuable asset for Purdue and the idea would be widely disseminated by it and other industry players, KOLs, and front groups in the years to come, as detailed *infra*.

77. Yet another well-known KOL, admitted in 2012 that pseudoaddiction "is already something we are debunking as a concept" and had become "too much of an excuse to give patients more medication. It led us down a path that caused harm."

78. This KOL received millions of dollars from opioid manufacturers and was the developer of the so-called "Opioid Risk Tool." The Opioid Risk Tool ("ORT") was a screening test that consisted of five questions whose answers were to be self-reported by the patient. Purdue deceptively claimed that the ORT could accurately — without any apparent fact-checking of the patient's answers — predict the risk of addiction for a given patient when in fact Purdue had no reliable scientific evidence demonstrating that the use of the ORT can materially limit addiction risk. There was no reliable scientific evidence that addiction risk can be mitigated through enhanced monitoring of those patients identified through the ORT as high-risk.

Likewise, for those patients who were not identified as high-risk, there was no reliable scientific evidence that they would be able to take opioids on a long-term basis without a significant danger of addiction.

79. Another crucial marketing channel for Purdue was its promotion of third-party organizations known as Front Groups, over whose publications Purdue exercised editorial input and control.

80. The Academy of Integrative Pain Management (“AIPM”), formerly known as the American Academy of Pain Management (“AAPM”) was a highly influential pro-opioid group. Purdue, together with another opioid manufacturer, gave more than \$1.2 million to AIPM between 2012 and 2017. AIPM acted as a repository of manufacturer-friendly testimony on opioid-related issues and gave presentations to various healthcare providers, regulators, legislators, patient advocacy organizations, and consumers. Indeed, AIPM attempted in 2008 to convince the FDA to consider the risk of the undertreatment of pain as a far more urgent and serious issue than the growing crisis of opioid diversion, abuse, and addiction.

81. In January 2019, AIPM abruptly ceased operations.

82. Purdue, along with other opioid manufacturers, provided substantial financial support to the American Geriatrics Society (“AGS”), so as to target their deceptive marketing at the vulnerable elderly.

83. AGS contracted with Purdue and two other opioid manufacturers to disseminate guidelines regarding the use of opioids for chronic pain in 2002 (*The Management of Persistent Pain in Older Persons*) and 2009 (*Pharmacological Management of Persistent Pain in Older Persons*, hereinafter “2009 AGS Guidelines”). The 2009 AGS Guidelines described the risk of addiction as “exceedingly low in older patients with no current or past history of substance

abuse.” It also recommended that “[a]ll patients with moderate to severe pain . . . should be considered for opioid therapy.” These statements are not supported by reliable scientific evidence.

84. APF was particularly dominated by Purdue. Indeed, Purdue poured at least \$3.6 million into that organization from 1997 to 2012. In 2010, APF told Purdue that it was able to connect with 28 million people through its “key messages about pain and overcoming barriers to treatment through print, television, radio, and online placements as a part of Purdue’s local market media outreach grant.” Upon information and belief, in 2011, APF and Purdue entered into a “Master Consulting Agreement,” thereby allowing Purdue to continue funding APF’s operations in exchange for APF promoting Purdue’s marketing initiatives.

85. The Pain Care Forum (“PCF”) is a coalition of opioid manufacturers, distributors, trade groups, and Front Groups. It was co-founded in 2005 by a Purdue lobbyist and the then-CEO of APF. The PCF lobbies on issues that might impact the opioid industry’s bottom line. Through the PCF, Purdue and other manufacturers have deployed extensive resources to resist efforts by New York and other states to adopt measures that might have mitigated the opioid epidemic. These include common-sense restrictions on opioid prescribing and related practices. As part of these efforts, manufacturers including Purdue spent over \$880 million on lobbying and campaign contributions targeting federal and state officials, including in New York, from 2006 to 2015.

86. In addition, PCF members like Purdue were actively involved in the crafting of a 2011 Institute of Medicine report that claimed that as many as 100 million Americans suffer from chronic pain (and therefore could benefit from the use of opioids).

87. In addition, Purdue sponsored and assisted in the distribution of numerous misleading unbranded marketing materials, many published in conjunction with aforementioned Front Groups, that promoted the use of opioid medications.

88. The book *Exit Wounds*, published by APF in 2009, was funded by Purdue as a means of targeting veterans. *Exit Wounds* was ostensibly a narrative of a returning soldier, Derek McGinnis (an employee of APF) who was dealing with chronic pain. The book was in fact written by a ghost writer for the pharmaceutical industry, Stephen R. Braun. The book lauded opioids as the “gold standard of pain medications,” yet complained they were “often underused.” This, the book stated, was because prescribers were “afraid to prescribe them” because of unreasonable fears of addiction. The book also described physical tolerance as “simply a psychological process that doesn’t occur for all people or with all medications,” and minimized risks of addiction. “Denying a person opioid pain medication because he or she has a history of substance abuse or addiction,” *Exit Wounds* declared, “is contrary to the model guidelines for prescribing opioids.”

89. *Exit Wounds* also negatively compared NSAID alternatives to opioids, claiming that those medications presented severe risks like “kidney failure,” “gastrointestinal (GI) bleeding,” and a “possible higher risk of stroke or heart attack.” Acetaminophen, meanwhile, “could cause liver damage.” By contrast, the book assured readers, “with the exception of constipation, most [opioid] side effects disappear after a few days.” Notably, it failed to warn readers of the risks of fatal interactions between opioids and anti-anxiety medicines known as benzodiazepines, which are commonly prescribed to veterans with post-traumatic stress disorder. In fact, a VA Office of Inspector General Report has stated that 96.4% of veterans with long-

term opioid prescriptions were also prescribed benzodiazepines, despite the increased danger of respiratory depression when the two drugs are taken together.

90. Purdue distributed APF's *Treatment Options* guide which touted "opioid agreements" that would take place between patients and prescribers and ensure that the patient would "take the opioid as prescribed."

91. Along with other opioid manufacturers, Purdue funded a medical education guide, *Opioid Prescribing: Clinical Tools and Risk Management Strategies* ("*Opioid Prescribing*"), that was authored by three members of the AIPM's Board of Directors. The guide was made available to AIPM at no charge and was intended to reach primary care physicians and other healthcare professionals. The guide deceptively instructs healthcare providers to give patients who present symptoms of "pseudoaddiction" *more* pain treatment — in other words, higher or more frequent dosages of opioids — because "[w]hen pain is treated appropriately, aggressive drug-seeking behavior ceases."

92. *Opioid Prescribing* tells healthcare providers that patients who use opioids to "cope with stress [or] relieve anxiety," are not exhibiting signs of addiction, but rather are displaying "other forms of aberrant drug use." *Opioid Prescribing* further provides that even "behaviors that suggest abuse," such as "unscheduled visits, multiple telephone calls to the clinic, unsanctioned dose escalations, obtaining opioids from more than one source, selling prescription drugs and forging prescriptions," may not be signs of addiction, but rather of "pain that is undertreated."

93. In addition, as part of an initiative it called Partners Against Pain, Purdue disseminated an unbranded pamphlet titled *Clinical Issues in Opioid Prescribing*. The pamphlet urged doctors to actively watch for signs of "pseudoaddiction" in their patients.

94. Purdue and other manufacturers also worked through the Federation of State Medical Boards (“FSMB”). In 2007, FSMB nationally disseminated a publication called *Responsible Opioid Prescribing*, and in 2012 it published a second edition entitled *Responsible Opioid Prescribing: A Clinician’s Guide*. These publications were widely distributed through legitimate channels: first to state medical boards, and then to practicing physicians. They misleadingly recommended powerful opioids as a first choice for chronic pain, underplayed the risk of addiction from those drugs, and reiterated the misleading concept of “pseudoaddiction” as an alternative explanation for drug-seeking behaviors or abuse. For example, behaviors including hoarding medications, “aggressively” complaining about the amount of medication prescribed, taking another person’s pain medications, and using more opioids than recommended were all deemed “LESS indicative of addiction.”

95. These publications did acknowledge funding from Purdue and other members of the opioid industry, but did not indicate that their very contents relied on materials sponsored by Purdue, that Purdue paid a \$50,000 grant to support their publication and contributed \$100,000 for their distribution, or that they were written by a Purdue KOL with extensive input from the Purdue medical director.

Other Misrepresentations and Deceptive Marketing Tactics

96. Purdue also published multiple websites promoting both the use and deregulation of opioid medications.

97. *In the Face of Pain* was a website that Purdue ran from 2001 until October of 2015. It claimed to be an advocacy resource for those in pain, and that it “provid[ed] tools to empower people with pain while educating others to advocate for appropriate and effective pain

care. The site declared that “pain is a national healthcare crisis” and America’s “hidden epidemic.”

98. In addition, the site housed documents like a “Handbook for People with Pain” and a “fact sheet” entitled “Protecting Access to Pain Treatment.” The latter publication acknowledged that “prescription drug abuse, particularly the abuse of pain medication, is a major public health concern in the United States” but nevertheless decried the “certain provider attitudes and training, which impede the delivery of high-quality care.”

99. *In the Face of Pain* also encouraged consumers to take action against government policies that might curb ready access to opioid medications. It instructed its readers that they should “be [their] own advocate” and to reach out “to people who are influential in raising awareness and determining pain-related policy, such as journalists or elected officials, as well as those in the greater community who will benefit most by learning about their rights to pain care.”

100. Another website, part of a Purdue-sponsored initiative called *Partners Against Pain*, was aimed at patients and their caregivers. It too complained that “chronic pain is often inadequately treated,” blaming this apparent undertreatment on a “need for a better understanding of pain” and even racially biased and misogynistic healthcare providers.

101. In a section of the website labelled “Straight Talk About Pain,” patients were encouraged to “speak up” because “your pain is real, and you deserve to be treated.” It even provided patients with a list of adjectives to use in describing their pain, so as to better their chances of treatment: “aching, throbbing, shooting, stabbing, gnawing, sharp, tender, burning, exhausting, penetrating, nagging, numb, and unbearable.”

102. Upon information and belief, many of the above misrepresentations Purdue made through advertising, Front Groups, and KOLs were repeated by its sales representatives. For

example, in a 2017 *Esquire* article entitled “The Secretive Family Making Billions from the Opioid Crises,” a sales representative is quoted as stating: “We were directed to lie. Why mince words about it?” In addition, through its Corporate Integrity Agreement with the federal government, Purdue was required to supervise its sales representatives in person at least five days a year. Upon information and belief, its management, however, disregarded this legal duty and did not set up any kind of system to keep track of this obligation.

103. Upon information and belief, in 2009, Purdue began advertising to thousands of doctors by gifting them free digital video recorders in exchange for watching opioid advertisements on a special television network.

104. Purdue also made a multitude of direct payments to healthcare providers. These payments consisted of fees for speaking and consulting, as well as gifts like meals. For example, from August through December 2015, Purdue paid over \$600,000 to almost 2,000 New York healthcare providers, leading all other opioid manufacturers in direct-to-prescriber payments in that time period. According to a study by the NYS Health Foundation, direct payments by opioid manufacturers to prescribers can lead to higher prescribing of opioids to patients.

105. Purdue also created a consumer savings program for OxyContin. The program offers patients five free prescriptions of OxyContin. After five prescriptions of OxyContin, however, many patients needed to buy the drug to stave off withdrawal. By June 2008, upon information and belief, 67,951 people had used the coupon savings program, and more than 18,000 of them — 27% — had gone through all five free prescriptions. In this manner people who would not have started the medication for reasons of cost were able to become addicted anyway. Like Purdue’s other sales strategies, this program had significant issues. As early as 2009, staff reported to Purdue’s board of directors compliance issues concerning the opioids

savings program, along with improper use of OxyContin marketing materials. In August of that year, staff reported to the board that the number of patients using the savings program had grown to more than 160,000. By late 2012, the opioids saving card program had a return on investment of 4.28 — for every million dollars in free opioids Purdue gave away for free, it earned back \$4,280,000.

106. In 2007, Purdue's parent company, Purdue Frederick, along with three top executives pleaded guilty in Virginia federal court to intentionally making misleading statements about OxyContin's addiction potential. In the Agreed Statement of Facts between the company and prosecutors, Purdue admitted: "Beginning on or about December 12, 1995, and continuing until on or about June 30, 2000, certain Purdue supervisors and employees, with the intent to defraud or mislead, marketed and promoted OxyContin as less addictive, less subject to abuse and diversion, and less likely to cause tolerance and withdrawal than other pain medications." Purdue Frederick also agreed to pay a \$600 million fine. From then on, Purdue Frederick was essentially put out of business, and its subsidiary Purdue Pharma LP took its place as the main operative entity.

107. Purdue was also aware of non-compliance occurring at distribution centers through which its drugs were passing. For example, in 2009, Purdue's Executive Director of Controlled Substances Act Compliance was informed by a sales manager that Purdue was selling its opioids to an illegal pill mill. "I feel very certain this is an organized drug ring," the manager wrote. He asked, "Shouldn't the DEA be contacted about this?" Purdue did report this information to authorities — more than two years later, and only after the doctor running the pill mill had been arrested. Despite being in charge of compliance, Purdue's compliance director's priority was to avoid the DEA, rather than prevent diversion. For example, in a 2007 email to an

executive at Cardinal Health, an opioid distributor, entitled “Our Friends at the DEA,” the director wrote, “I see our friends [the DEA] are at it again . . . I’m sorry that the DEA is being so aggressive with this Suspicious Orders stuff . . . I wish there was something I could do to help in this situation — we are all in the same boat.”

108. In 2010, in the face of the looming expiration date of OxyContin’s patent, Purdue removed the drug’s original formulation from the market and replaced it with an “abuse-deterrent” version. The new pills had hardened shells, which would make it more difficult for abusers to crush and then snort the pills. However, upon information and belief, as then-CEO John Stewart wrote to Richard Sackler as early as February of 2008, this new version of OxyContin would “not stop patients from the simple act of taking too many pills.”

Purdue Post-Conviction

109. As late as 2008, after the 2007 criminal convictions of its parent company and top executives, Purdue still tacitly denied OxyContin’s intrinsically addictive nature, pointing instead to addicts as the real villains. Upon information and belief, a marketing presentation listed “KEY MESSAGES THAT WORK,” including the following statement: “It’s not addiction, it’s abuse. It’s about personal responsibility.”

110. Upon information and belief, in 2009, Purdue created a marketing campaign called *Options* that encouraged doctors to continually increase OxyContin dosages without any limitations. Doctors were encouraged to “adjust [their] patient’s dose every 1-2 days, if needed.”

111. Upon information and belief, Purdue knew that higher doses were more dangerous to patients; a 2013 internal analysis concluded that it was “very likely” that patients face “dose-related overdose risk.” That same year, however, Purdue stated in a press release that “dose was not a risk factor for opioid overdose.” Purdue knew that higher doses had “a direct

relationship” with keeping patients on OxyContin for longer periods of time. Getting patients on these high doses was labeled with the euphemism “Improving the Length of Therapy.”

112. As early as 2014, Purdue Pharma, with the help of Kathe Sackler, engaged in a venture coded “Project Tango,” which was a plan for Purdue to expand into the business of selling drugs to treat opioid addiction. In an internal presentation, Purdue openly declared the simple fact it had spent years denying: “Pain treatment and addiction are naturally linked.” The same presentation also provided that opioid addiction “can happen to anyone — from a 50-year-old woman with chronic lower back pain to an 18-year-old boy with a sports injury, from the very wealthy to the very poor.”

113. In addition, in 2007, Richard Sackler applied for a patent to treat opioid addiction. He finally received it in January 2018, assigning it to Rhodes Pharmaceuticals. Rhodes is a separate company from Purdue that is also owned by the Sacklers. The patent application openly admits that opioids are addictive and calls opioid addicts “junkies.” It also asks for a monopoly on a method of treating addiction to opioids.

V.

SPECIFICATION OF VIOLATIONS

COUNT ONE

New York Insurance Law § 403
(Against Each Respondent)

114. The Department realleges and incorporates by reference the assertions contained in paragraphs 1-113 above as if set forth fully herein.

115. Pursuant to Section 403 of the New York Insurance Law, the Superintendent has the authority to levy civil penalties upon any person who has committed a fraudulent insurance act, as defined in Section 176.05 of the New York Penal Law.

116. Under New York Penal Law Section 176.05, a fraudulent insurance act is an act “committed by any person who, knowingly and with intent to defraud presents [or] causes to be presented . . . to . . . an insurer . . . or any agent thereof: . . . a claim for payment, services or other benefit pursuant to [a health insurance] policy, contract or plan that he or she knows to: (a) contain materially false information concerning any material fact thereto; or (b) conceal, for the purpose of misleading, information concerning any fact material thereto”

117. At least since the mid-1990s, Respondents and their predecessors in interest have knowingly and with intent to defraud caused to be presented to an insurer or any agent thereof written statements or other physical evidence as part of or in support of claims for payment, services or other benefit pursuant to a health insurance policy or private or public health plan that they knew to (a) contain materially false information concerning any material fact thereto; or (b) conceal, for the purpose of misleading, information concerning any factor material thereto.

118. Specifically, Respondents knowingly and with intent to defraud made numerous misrepresentations, directly or through third parties, concerning the safety and efficacy of opioids.

119. Those misrepresentations caused healthcare providers to present false claims for payment to insurers regulated by DFS on multiple and continuous occasions over the past decades in the form of written prescriptions for opioid medications and related documentation.

120. Such prescriptions carried with them express and/or implied representations that the opioid drugs being prescribed were medically necessary, legitimate and/or appropriate. Respondents were aware that such representations were, for the majority of the opioid prescriptions written during the relevant time period, false. The falsity of these representations was material to the successful claims for payment.

121. In the alternative, to the extent that third parties engaged in conduct that violated New York Penal Law §176.05, including without limitation prescribing doctors who wrote fraudulent prescriptions and patients who sought and obtained such fraudulent prescriptions, Respondents are liable for such conduct because they, knowingly and with an intent to defraud, solicited, requested, commanded, importuned and/or intentionally aided such third parties in such conduct.

122. Accordingly, Respondents have committed a fraudulent insurance act as that term is defined in New York Insurance Law §403. As a result, the Department is entitled to levy a civil penalty not to exceed five thousand dollars (\$5,000) plus the amount of each claim paid, for each violation. In this case, each fraudulent prescription constitutes an independent violation.

COUNT TWO
New York Financial Services Law § 408
(Against Each Respondent)

123. Petitioner realleges and incorporates by reference the assertions contained in paragraphs 1-122 above as if set forth fully herein.

124. Pursuant to Section 408(a)(1)(A) of the New York Financial Services Law, the Superintendent has the authority to levy civil penalties upon any person who has committed any intentional fraud or intentional misrepresentation of a material fact with respect to a financial product or service or involving any person offering to provide or providing financial products or services. “Financial product or service” includes, among other things, any financial product or service provided by person regulated by the Superintendent under the New York Insurance Law. This includes commercial health insurance plans.

125. Respondents, through their marketing, promotion, manufacture and supply of opioids drugs to patients for whom such drugs were not medically necessary, legitimate, and

appropriate, committed acts of intentional fraud or intentional misrepresentation of material facts with respect to claims for insurance products or services or involving any person offering to provide or providing financial products or services.

126. Respondents, with the intent to defraud, made knowingly false representations about the safety and efficacy of opioid drugs.

127. These misrepresentations were made with the intent of increasing the demand for opioids into areas of treatment that were not medically necessary, legitimate, and appropriate.

128. Respondents were aware that the increase in demand would cause fraudulent claims to be made to insurance companies.

129. Accordingly, Respondents committed intentional fraud and/or made intentional misrepresentations of material facts with respect to a financial product or service and are thus liable to pay a civil penalty of up to five thousand dollars (\$5,000) per offense. In this case, each fraudulent prescription constitutes an independent offense.

PLEASE TAKE NOTICE THAT, as a result of these charged violations, the Department is seeking the following relief:

- a) The imposition of civil monetary penalties against Respondents;
- b) An order directing Respondents to cease and desist all activity that constitutes the violations of law enumerated herein; and
- c) Such other relief as is deemed just and appropriate.

PLEASE TAKE FURTHER NOTICE THAT:

(A) This Notice of Hearing and Statement of Charges is issued to Respondents pursuant to § 403 of the Insurance Law and §§ 305 and 306 of the Financial Services Law, and notice of the hearing is given to Respondents in accordance with § 304 of the Financial Services Law.

(B) Your attention is directed to a statement in plain language, attached hereto as Appendix A, summarizing the provisions of 23 NYCRR Part 2. **This statement contains important information concerning your rights and the Department's hearing procedures and should be read carefully.** A copy of 23 NYCRR Part 2 will be furnished upon request.

(C) Interpreter services shall be made available to deaf persons, at no charge.

(D) Should you fail to appear at the time and place set forth above, or at any subsequent date fixed for the hearing, the hearing will proceed as scheduled and may result in the following:

- i. The issuance of a report by the Superintendent finding violations of Section 403 of the Insurance Law and Section 408 of the Financial Services Law and the issuance of an order upon the Respondent requiring it to cease and desist from engaging in such violations; and

- ii. The assessment of monetary fines against the Respondents pursuant to Insurance Law § 403(c) and Financial Services Law § 408.

Dated: New York, New York
July __, 2020

NEW YORK STATE
DEPARTMENT OF FINANCIAL SERVICES

By: _____
KEVIN R. PUVALOWSKI
Senior Deputy Superintendent
Consumer Protection and Financial Enforcement

KATHERINE A. LEMIRE
Executive Deputy Superintendent
Consumer Protection and Financial Enforcement

LINDA DONAHUE
LILLIAN GRINNELL
JOHN NICOSIA

Of Counsel

One State Street
New York, New York 10004
(212) 709-5578

Schedule 10.34 - North Carolina

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of North Carolina
2. Where should notices to the Claimant be sent?	Name: Daniel P. Mosteller, Special Deputy Attorney General
	Address: 114 West Edenton Street; P.O. Box 629
	City: Raleigh State: NC ZIP Code: 27602
	Contact phone: (919) 716-6026
	Contact email: Dmosteller@ncdoj.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of North Carolina, ex rel. Joshua H. Stein v. Purdue Pharmaceuticals L.P.; Purdue Pharma Inc.; Purdue Pharma of North Carolina L.P.; Purdue Pharma Technologies Inc.; Purdue Pharma Manufacturing L.P.; Purdue Pharma Manufacturing (New York) Inc.; and the Purdue Frederick Company

Case Number: 18-cv-6051	
Court Name: Wake County Superior Court	
Date the Complaint was filed: May 5, 2018	
Was the Complaint sealed at filing? Yes	
If so, does the Complaint remain under seal? Yes	
Causes of action asserted in the Complaint: 1. Violation of the North Carolina Unfair or Deceptive Practices Act, N.C.G.S. § 75-1.1, et seq.	
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action: 6. Supporting Documentation:	1. Violation of the North Carolina Controlled Substances Act, N.C.G.S. § 90-86, et seq. 2. Violation of the North Carolina Racketeer Influenced and Corrupt Organizations Act, N.C.G.S. § 75D-4, et seq. 3. Common law nuisance
In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.	
7. Claim Amount ⁴	\$68,208,000,000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/20 (mm/dd/yy)

Joshua H. Stein
Attorney General for the State of North Carolina

By: /s/ Daniel P. Mosteller
Daniel P. Mosteller
Special Deputy Attorney General
Consumer Protection Division
114 West Edenton Street
Raleigh, NC 27603
(919) 716-6026

Schedule 10.35 - North Dakota

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of North Dakota
2. Where should notices to the Claimant be sent?	Name: Parrell D. Grossman, Assistant Attorney General Elin S. Alm, Assistant Attorney General
	Address: 1050 E Interstate Ave, Ste 200
	City: Bismarck State: ND ZIP Code: 58503-5574
	Contact phone: (701) 328 5570
	Contact email: pgrossman@nd.gov ealm@nd.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of North Dakota Ex Rel. Wayne Stenehjem, Attorney General v. Purdue Pharma L.P.; Purdue Pharma, Inc.; The Purdue Frederick Company Inc.; and Does I Through 100, Inclusive
	Case Number: 08-2018-CV-01300
	Court Name: Burleigh County District Court
	Date the Complaint was filed: 5/15/2018
	Was the Complaint sealed at filing? No
	If so, does the Complaint remain under seal? N/A

Causes of action asserted in the Complaint:	
<ol style="list-style-type: none"> Deceptive Practices - North Dakota Consumer Fraud Law, N.D.C.C. §51-15-01, et seq., “Unlawful Sales or Advertising Practices” Unconscionable Practices - North Dakota Consumer Fraud Law, N.D.C.C. §51-15-01, et seq., “Unlawful Sales or Advertising Practices” Public Nuisance – N.D.C.C. §42-02-01 et seq. “Nuisances – General Provisions,” and N.D.C.C. §42-02-01 et seq. “Abatement of Common Nuisance.” 	
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	<ol style="list-style-type: none"> Statutory Deceit, N.D.C.C. § 9-10-02 et seq. Common law and Statutory fraud, N.D.C.C. §9-03-08 et seq. Product Liability – strict liability and negligence Unjust enrichment North Dakota Food Drug and Cosmetic Act, N.D.C.C. §19-02.1.01 et seq. Triple damages for knowingly committing violations of the Consumer Fraud Law - N.D.C.C. §51-15-09, “Unlawful Sales or Advertising Practices” Exemplary damages, N.D.C.C. §32-03.2-11
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$5,236,000,000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

Wayne Stenehjem
Attorney General for the State of North Dakota

By: /s/ Parrell D. Grossman
Parrell D. Grossman (ND ID 04684)
Elin S. Alm (ND ID. 05924)
Assistant Attorneys General
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ealm@nd.gov

Schedule 10.36 - Ohio

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Ohio
2. Where should notices to the Claimant be sent?	Name: Jonathan D. Blanton, Deputy Attorney General for Major Litigation
	Address: 30 East Broad St., 17th floor
	City: Columbus State: OH ZIP Code: 432151
	Contact phone: (614) 728-1171
	Contact email: Jonathan.Blanton@ohioattorneygeneral.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: STATE OF OHIO, ex. rel, MIKE DEWINE, Ohio Attorney General vs. Purdue Pharma L.P., Purdue Pharma, Inc, The Purdue Frederick Company, Inc., et. al.
	Case Number: 17CI000261
	Court Name Ross County Court of Common Pleas

Date the Complaint was filed: **May 31, 2017**

Was the Complaint sealed 17 filing? **No**

If so, does the Complaint remain under seal? **N/A**

Causes of action asserted in the Complaint:

- 1. Public Nuisance Ohio Product Liability Act – R.C. 2307.71, et. seq.**
- 2. Public Nuisance – Ohio Common Law**
- 3. Ohio Consumer Sales Practices Act, R.C. 1345.02 & 1345.03**
- 4. Ohio Medicaid Fraud, R.C. 2307.60**
- 5. Common Law Fraud**
- 6. Ohio Corrupt Practices Act, R.C. 2923.31 et. seq.**

Case Name:

Case Number:

Court Name:

Date the Complaint was filed:

Was the Complaint sealed at filing?

If so, does the Complaint remain under seal?

Causes of action asserted in the Complaint

5. In addition to the causes of action set forth in the

Complaint, the undersigned also identifies the following causes of action:	
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases
7. Claim Amount ⁴	\$95,859,000,000

[balance of page intentionally left blank]

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

DAVE YOST
Attorney General for the State of OHIO

By: /s/ Jonathan D. Blanton
Jonathan D. Blanton
Deputy Attorney General for Major Litigation
Ohio Attorney General
30 East Broad St., 17th floor
Columbus, Ohio 43215
Phone: (614) 728-1171
Fax: 866-537-5781
Email: Jonathan.Blanton@ohioattorneygeneral.gov

Schedule 10.38 - Oregon

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Oregon
2. Where should notices to the Claimant be sent?	Name: David A. Hart, Assistant Attorney in Charge
	Address: 100 SW Market Street
	City: Portland State: OR ZIP Code: 97201
	Contact phone: (971) 673-1880
	Contact email: david.hart@doj.state.or.us
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: STATE OF OREGON, ex rel. ELLEN F.ROSENBLUM, Attorney General for the State of Oregon, Plaintiff vs. PURDUE PHARMA L.P. Delaware limited partnership; PURDUE PHARMA INC., a New York corporation; and THE PURDUE FREDERICK COMPANY INC., a New York Defendants
	Case Number: 18CV40526

Court Name: **Circuit Court of the State of Oregon County of Multnomah**

Date the Complaint was filed: **13 September 2018**

Was the Complaint sealed at filing? **Partially under seal**

If so, does the Complaint remain under seal? **Yes**

Causes of action asserted in the Complaint:

- 1. Unlawful Trade Practices Act**
- 2. Elderly Persons and Persons with Disabilities Abuse Prevention Act**
- 3. Oregon False Claims Act**
- 4. Oregon Racketeer Influenced and Corrupt Organizations Act**

Case Name: **STATE OF OREGON, ex rel. ELLEN F. ROSENBLUM, Attorney General for the State of Oregon, Plaintiff, vs. RICHARD S. SACKLER, an individual; JONATHAN D. SACKLER, an individual; MORTIMER D.A. SACKLER, an individual; KATHE A. SACKLER, an individual; ILENE SACKLER LEFCOURT, an individual; DAVID A. SACKLER, an individual; BEVERLY SACKLER, an individual; THERESA SACKLER, an individual; PURDUE PHARMA L.P., a Delaware limited partnership; and PURDUE PHARMA INC., a New York corporation, Defendants**

Case Number: **19CV22185**

Court Name: **Circuit Court of the State of Oregon County of Multnomah**

Date the Complaint was filed: **30 August 2019**

Was the Complaint sealed at filing? **NO**

If so, does the Complaint remain under seal? **N/A**

Causes of action asserted in the Complaint:

- 1. Declaratory relief**

	2. Intentional fraudulent conveyance
	3. Constructive fraudulent conveyance
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	1. Common Law Negligence 2. Common Law Nuisance
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases
7. Claim Amount ⁴	\$37,054,000,000

[balance of page intentionally left blank]

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/20 (mm/dd/yy)

ELLEN F. ROSENBLUM
Attorney General for the State of Oregon

By: /s/ David A. Hart
David A. Hart
Assistant Attorney in Charge
Oregon Department of Justice
Financial Fraud/Consumer Protection Section
100 SW Market Street
Portland, OR 97201
Phone: (971) 673-1880
Fax: (971) 673-1884
Email: david.hart@doj.state.or.us

Schedule 10.39 - Pennsylvania

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: Commonwealth of Pennsylvania
2. Where should notices to the Claimant be sent?	Name: Neil F. Mara
	Address: 14th Floor, Strawberry Square
	City: Harrisburg State: PA ZIP Code: 17120
	Contact phone: (717) 787 3991
	Contact email: nmara@attorneygeneral.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint	Case Name: Commonwealth of Pennsylvania by Attorney General Josh Shapiro v. Purdue Pharma L.P., Purdue Pharma Inc. and the Purdue Frederick Company
	Case Number: 257 MD 19

(the “ <u>Complaint</u> ”) against the Debtors:	Court Name: Commonwealth Court of Pennsylvania	
	Date the Complaint was filed: May 2, 2019	
	Was the Complaint sealed at filing? Yes	
	If so, does the Complaint remain under seal? No	
	Causes of action asserted in the Complaint: 1. Violations of Unfair Trade Practices and Consumer Protection Law.	
<p>5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:</p>		
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.	
7. Claim Amount ⁴	\$90,197,000,000	

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/20 (mm/dd/yy)

JOSH SHAPIRO
Attorney General

JAMES A. DONAHUE, III
Executive Deputy Attorney General

By: /s/ Neil F. Mara
Neil F. Mara
Chief Deputy Attorney General
Public Protection Division
14th Floor, Strawberry Square
Harrisburg, PA 17120
(717) 787 3991

Schedule 10.40 – Rhode Island

In re Purdue Pharma, L.P., et al.

United States Bankruptcy Court

Southern District of New York

Case No.: 19-23649 (RDD)

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Rhode Island
2. Where should notices to the Claimant be sent?	Name: Neil F.X. Kelly, Assistant Attorney General
	Address: 150 South Main Street
	City: Providence State: RI ZIP Code: 02903
	Contact phone: 401-274-4400 Ext. 2284
	Contact email: nkelly@riag.ri.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors

4. The Claimant has commenced a lawsuit by filing the following complaint (the “Complaint”) against the Debtors:

Case Name: **State of Rhode Island, by and through, Peter F. Nerhona, Attorney General v. Purdue Pharma, L.P.; Purdue Pharma, Inc.; The Purdue Fredrick Company, Inc.; Rhodes Pharmaceuticals, L.P.; Rhodes Technologies; Rhodes Technologies, Inc.; Richard Sackler, et al.**

Case Number: **CA No. PC-2018-4555**

Court Name: **Rhode Island Superior Court**

Date the Complaint was filed: **November 19, 2018**

Was the Complaint sealed at filing? **Partially sealed**

If so, does the Complaint remain under seal? **NO**

Causes of action asserted in the Complaint:

1. Public Nuisance

2. Fraud and Fraudulent Misrepresentation

3. Negligence/Negligence Per Se/Gross Negligence and Negligent Misrepresentation

4. Unjust Enrichment

5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount	\$12,189,133,000

Part 3: Sign Below	
8. The person completing this authorization form must sign and date it.	<p>I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.</p> <p>Executed on: <u>07/30/20</u> (mm/dd/yy)</p> <p>Peter F. Neronha Attorney General for the State of Rhode Island</p> <p>By: <u>/s/ Neil F.X. Kelly</u> Neil F.X. Kelly, Assistant Attorney General Office of the Attorney General 150 South Main Street Providence, Rhode Island 02903 401-274-4400 x 2284</p>

Schedule 10.41 – South Carolina

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of South Carolina
2. Where should notices to the Claimant be sent?	Name: Annemarie B. Mathews
	Address: P.O. Box 11549
	City: Columbia State: SC ZIP Code: 29211-1549
	Contact phone: (803) 734-3679
	Contact email: amathews@scag.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: The State of South Carolina ex rel. Alan Wilson, in his official capacity as Attorney General of the State of South Carolina v. Purdue Pharma L.P., Purdue Pharma, Inc. and the Purdue Frederick Company
	Case Number: 2017-CP-4004872
	Court Name: Richland County, South Carolina Court of Common Pleas
	Date the Complaint was filed: August 15, 2017
	Was the Complaint sealed at filing? Yes
	If so, does the Complaint remain under seal? No

<p>Causes of action asserted in the Complaint:</p> <ol style="list-style-type: none"> 1. South Carolina Unfair Trade Practices Act-Deceptive Acts and Practices, S.C. Code Ann. §39-5-20, et. seq. 2. South Carolina Unfair Trade Practices Act-Unfair Competition, S.C. Code Ann. §39-5-20, et. seq. 3. Violations of 2007 Consent Judgment 4. Public Nuisance 	
<p>5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:</p> <p>6. Supporting Documentation:</p>	<p>In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.</p>
<p>7. Claim Amount⁴</p>	<p>\$27,983,000,000</p>

Part 3: Sign Below	
<p>8. The person completing this authorization form must sign and date it.</p>	<p>I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.</p> <p>Executed on: <u>07/30/2020</u></p> <p>Alan Wilson Attorney General for the State of South Carolina</p> <p>By: <u>/s/ W. Jeffrey Young</u> W. Jeffrey Young Chief Deputy Attorney General</p>

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

P.O. Box 11549
Columbia, SC 29211-1549
Office: (803) 734-6680

Schedule 10.42 – South Dakota

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of South Dakota
2. Where should notices to the Claimant be sent?	Name: Philip D. Carlson Assistant Attorney General, Consumer Protection Division Office of the South Dakota Attorney General
	Address: 1302 E. Hwy. 14, Ste. 1
	City: Pierre State: SD ZIP Code: 57501
	Contact phone: (605) 773-3215
	Contact email: Phil.Carlson@state.sd.us
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of South Dakota, ex rel. Jason R. Ravnsborg, South Dakota Attorney General, v. Purdue Pharma, et al.
	Case Number: 32CIV18-000065
	Court Name: Hughes County Circuit Court, Sixth Judicial Circuit

Date the Complaint was filed: August 23, 2019 (Second Amended Complaint), March 14, 2018 (original Complaint)	
Was the Complaint sealed at filing? No	
If so, does the Complaint remain under seal? N/A	
Causes of action asserted in the Complaint:	
<ol style="list-style-type: none"> 1. Public Nuisance (SDCL 21-10-1 to -9) 2. Violation of South Dakota Deceptive Trade Practices and Consumer Protection Act (SDCL 37-24-1 Et. Seq.) 3. Negligence (SD Common Law) 4. Negligence Per Se (SD Common Law) 5. Civil Conspiracy 6. Unjust Enrichment 	
<p>5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:</p> <p>6. Supporting Documentation:</p>	<p>In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.</p>
7. Claim Amount ⁴	\$5,018,000,000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

Jason R. Ravensborg
Attorney General for the State of South Dakota

By: /s/ Philip D. Carlson
Philip D. Carlson
Assistant Attorney General
Office of the South Dakota Attorney General
1302 E. Hwy. 14, Ste. 1
Pierre, SD 57501
(605) 773-3215

Schedule 10.43 - Tennessee

In re Purdue Pharma, L.P., et al.

United States Bankruptcy Court

Southern District of New York

Case No.: 19-23649 (RDD)

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

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to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Tennessee
2. Where should notices to the Claimant be sent?	Name: Gill R. Geldreich
	Address: P.O. Box 20207
	City: Nashville State: TN ZIP Code: 37202
	Contact phone: (615) 532-2546
	Contact email: Gill.Geldreich@ag.tn.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Tennessee <i>ex rel.</i> Herbert H. Slatery III, Attorney General and Reporter, v. Purdue Pharma, L.P.
	Case Number: 1-173-18
	Court Name: Circuit Court for Knox County, Tennessee
	Date the Complaint was filed: May 15, 2018
	Was the Complaint sealed at filing? Yes
	If so, does the Complaint remain under seal? No

<p>Causes of action asserted in the Complaint:</p> <ol style="list-style-type: none"> 1) Violations of Tennessee Consumer Protection Act <ol style="list-style-type: none"> a) Deceptive claims and material omissions about the benefits, safety and risks of opioid products b) Failure to disclose business relationships with advocacy groups and professional organizations that recommended opioid products based on scientific evidence and data 2) Violations of the 2007 Agreed Judgment with Tennessee and other states <ol style="list-style-type: none"> a) Failure to properly establish, implement, and follow an Abuse and Diversion Detection (“ADD”) program b) Directing and incentivizing sales representatives, despite clear evidence of diversion, to target vulnerable populations and high-volume prescribers 3) Common law public nuisance <ol style="list-style-type: none"> a) Acts and omissions in the promotion of harmful opioid products, interfering in the commercial marketplace and endangering the health and safety of citizens b) Failure to recognize and mitigate diversion of opioid products from legitimate medical uses to the illicit marketplace, causing harm to the health and safety of citizens 		
5.	In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	
6.	Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7.	Claim Amount ⁴	\$53,629,000,000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/2020

HERBERT H. SLATERY III
Attorney General for the State of Tennessee

By: /s/Gill R. Geldreich
GILL R. GELDREICH
Deputy Attorney General
P.O. Box 20207
Nashville, TN 37202
(615) 532-2546
Gill.Geldreich@ag.tn.gov

Schedule 10.44 - Texas

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

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to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Texas
2. Where should notices to the Claimant be sent?	Name: Paul Singer
	Address: 209 W 14th Street
	City: Austin State: TX ZIP Code: 78701
	Contact phone: (512) 936-1791
	Contact email: paul.singer@oag.texas.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Texas v. Purdue Pharma L.P. et al.
	Case Number: MDL Pretrial Cause No. 2018-77003, Master File Cause No. 2018-63587, transferred from D-1-GN-18-002403
	Court Name: Harris County District Court, transferred for pretrial proceedings from Travis County District Court
	Date the Complaint was filed: May 15, 2018
	Was the Complaint sealed at filing? No
	If so, does the Complaint remain under seal? N/A

Causes of action asserted in the Complaint:	
	1. Deceptive Trade Practices/UDAP claims under the Texas Consumer Protection-Deceptive Trade Practices Act, Tex. Bus. & Com. Code Sections 17.41 et seq.
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	1. Public Nuisance claims; 2. Common Law Fraud claims; 3. Negligence claims; 4. Gross Negligence claims; 5. Claims for violations of the Texas Controlled Substances Act; 6. Unjust Enrichment; 7. Civil RICO claims; 8. Deceptive Trade Practices claims—State as Harmed Consumer; and 9. Claims for violations of the Texas Medicaid Fraud Protection Act. 10. Claims for violations of the Texas Food Drug and Cosmetic Act
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$87,243,000,000

Part 3: Sign Below	
8. The person completing this authorization form must sign and date it.	<p>I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.</p> <p>Executed on: <u>07/30/2020</u></p> <p>KEN PAXTON Attorney General of Texas</p> <p>JEFFREY C. MATEER First Assistant Attorney General</p>

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

RYAN BANGERT
Deputy First Assistant Attorney General

DARREN L. MCCARTY
Deputy Attorney General for Civil Litigation

PAUL SINGER
Senior Counsel for Public Protection

/s/ Paul Singer
Paul Singer
Texas Office of the Attorney General
209 W 14th Street
Austin, TX 78701
(512) 936-1791
paul.singer@oag.texas.gov

Schedule 10.45 - Utah

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

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to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Utah
2. Where should notices to the Claimant be sent?	Name: Kevin McLean
	Address: 160 East 300 South, 5th Floor, PO Box 140872
	City: Salt Lake City State: UT ZIP Code: 84114-0872
	Contact phone: (801) 366-0310
	Contact email: kmclean@agutah.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits and Actions Commenced by Claimant Against the Debtors	
4. (a) The Claimant commenced a lawsuit by filing the following complaint	Case Name: State of Utah, v. Purdue Pharma L.P., Purdue Pharma Inc., and The Purdue Frederick Company.
	Case Number: 180700055

(the " <u>Complaint</u> ") against the Debtors:	Court Name: Seventh Judicial District Court; Carbon County, Utah
	Date the Complaint was filed: 5/31/2018
	Was the Complaint sealed at filing? No.
	If so, does the Complaint remain under seal? N/A
	Causes of action asserted in the Complaint: 1. Violations of the Utah Consumer Sales Practices Act. Utah Code § 13-11-1, et seq. 2. Nuisance 3. Negligence 4. Unjust Enrichment 5. Fraud
4. (b) The Claimant has commenced an lawsuit by filing a Citation and Notice of Agency Action (the " <u>Citation</u> " and "NOAA") against the Debtors:	Case Name: In the Matter of: PURDUE PHARMA L.P., a Delaware limited partnership; PURDUE PHARMA INC., a New York Corporation; THE PURDUE FREDERICK COMPANY, a Delaware corporation; RICHARD SACKLER, M.D., individually and as an owner, officer, director, member, principal, manager, and/or key employee of the above named entities; and KATHE SACKLER, M.D., individually and as an owner, officer, director, member, principal, manager, and/or key employee of the above named entities;
	Respondents.
	DCP Legal File No. CP-2019-005; DCP Case No. 107102
	Administrative Body: The Division of Consumer Protection of the Utah Department of Commerce
	Date the Citation and NOAA were filed: 1/30/2019
	Was the Citation sealed at filing? The Citation was filed with some redactions, with the approval of the administrative law judge.

<p>If so, does the Citation remain under seal? The redactions remain the subject of the administrative law judges ruling.</p>	
<p>Causes of action asserted in the Citation:</p> <p>1. Violations of the Utah Consumer Sales Practices Act. Utah Code § 13-11-1, <i>et seq.</i></p>	
<p>5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:</p>	
<p>6. Supporting Documentation:</p>	<p>In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.</p>
<p>7. Claim Amount⁴</p>	<p>\$19,049,000,000</p>

Part 3: Sign Below

<p>8. The person completing this authorization form must sign and date it.</p>	<p>I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.</p>
--	--

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Executed on: 07/30/20 (mm/dd/yy)

Sean D. Reyes
Attorney General for the State of Utah

By: /s/ Kevin McLean
Kevin McLean
Assistant Attorney General
Utah Attorney General's Office
160 East 300 South, 5th Floor
PO Box 140872
Salt Lake City, UT 84114-0872
(801) 366-0310

Schedule 10.46 - Vermont

In re Purdue Pharma, L.P., et al.

United States Bankruptcy Court

Southern District of New York

Case No.: 19-23649 (RDD)

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
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³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Vermont
2. Where should notices to the Claimant be sent?	Name: Jill S. Abrams Director, Consumer Protection Division
	Address: 109 State Street
	City: Montpelier State: VT ZIP Code: 05609
	Contact phone: 802.828.1106
	Contact email: jill.abrams@vermont.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Vermont vs. Purdue Pharma, L.P., Purdue Pharma Inc. and The Purdue Frederick Company
	Case Number: 757-9-18 Cncv
	Court Name: Superior Court, Chittenden Civil Division

Date the Complaint was filed: September 5, 2018	
Was the Complaint sealed at filing? No, filed with redactions	
If so, does the Complaint remain under seal? N/A	
Causes of action asserted in the Complaint: 1. 9 V.S.A. § 2453 Deceptive acts and practices 2. 9 V.S.A. § 2453 Unfair acts and practices 3. Public Nuisance	
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action: 6. Supporting Documentation: In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.	
7. Claim Amount ⁴	\$8,822,000,000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/20 (mm/dd/yy)

Thomas J. Donovan, Jr.
Attorney General for the State of Vermont

By: /s/ Jill S. Abrams
Jill S. Abrams
Director, Consumer Protection Division
Assistant Attorney General
109 State Street
Montpelier, VT 05609

Schedule 10.47 - Virginia

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: Commonwealth of Virginia
2. Where should notices to the Claimant be sent?	Name: Thomas M. Beshere
	Address: 202 North 9th Street
	City: Richmond State: VA ZIP Code: 23219
	Contact phone: (804) 823-6335; (804) 387-5346
	Contact email: tbeshere@oag.state.va.us
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: Commonwealth of Virginia, ex. rel. Mark R. Herring, Attorney General v. Purdue Pharma L.P., Purdue Pharma Inc., The Purdue Frederick Company, Richard Sackler, Jonathan Sackler, Kathe Sackler, and Mortimer Sackler
	Case Number: CL18-1076

Court Name: **Circuit Court for Tazewell County**

Date the Complaint was filed: **June 27, 2018**

Was the Complaint sealed at filing? **Yes, both the original and Amended Complaints were filed under seal.**

If so, does the Complaint remain under seal? **Original Complaint is no longer under seal; Amended Complaint remains under seal. A redacted version of the Amended Complaint is publicly available.**

Causes of action asserted in the Complaint: **Amended Complaint**

Defendants Purdue Pharma L.P., Purdue Pharma Inc., and The Purdue Frederick Company are collectively referred to as “Purdue”.

- 1. Violation of the Virginia Consumer Protection Act against Purdue**
- 2. Individual Liability of Defendant Richard Sackler for Violations of the Virginia Consumer Protection Act By or Through Purdue**
- 3. Public Nuisance against Purdue**
- 4. Fraudulent Conveyances against All Defendants**

5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:

6. Supporting Documentation:

In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint and the Amended Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.

7. Claim Amount ⁴	\$57,450,000,000 plus unliquidated amounts for disgorgement of ill-gotten gains or benefits, statutory civil penalties, attachment and/or constructive trust for the preservation and return of funds fraudulently conveyed, costs, expenses, attorney's fees, and any other relief the Court may deem equitable and proper.
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Part 3: Sign Below

8. The person completing this authorization form must sign and date it.	I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.
---	---

Executed on: 07/30/2020

Mark R. Herring
Attorney General for the Commonwealth of Virginia

By: /s/ Thomas M. Beshere
Thomas M. Beshere, Special Assistant Attorney General
Office of the Attorney General of Virginia
202 North 9th Street
Richmond, Virginia 23219
804-823-6335

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Schedule 10.48 – State of Washington

In re Purdue Pharma, L.P., et al.

United States Bankruptcy Court

Southern District of New York

Case No.: 19-23649 (RDD)

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Basis of Claim/Reservation of Rights” annexed to the Consolidated Claim.

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Consolidated Claim.

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Washington
2. Where should notices to the Claimant be sent?	Name: Tad Robinson O’Neill, Assistant Attorney General
	Address: 800 Fifth Ave, Suite 200
	City: Seattle State: WA ZIP Code: 98104
	Contact phone: 206-257-0504
	Contact email: tad.oneill@atg.wa.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Washington v. Purdue Pharma Inc.; The Purdue Frederick Company; Does 1 through 99; and Doe Corporations 1 through 99
	Case Number: 17-2-25505-0 SEA
	Court Name: Superior Court for King County
	Date the Complaint was filed: 9/28/2017

Was the Complaint sealed at filing? No – but it was redacted	
If so, does the Complaint remain under seal? An unredacted copy of the First Amended Complaint was filed 5/4/2018	
Causes of action asserted in the Complaint: 1. Violations of Consumer Protection Act, RCW 19.86 2. Public Nuisance and Violations of RCW 7.48.120 3. Common Law Negligence	
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$55,155,000,000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment. Please note that prior to the debtor's declaration of bankruptcy, Washington provided the debtor with expert reports calculating damages and abatement in Washington using a methodology of which varies slightly from that used in the joint proof of claim. Washington reserves the right to rely on Washington's reports and calculations which may result in a different amount than claimed here, but joins the other States in using this methodology for the purposes of claim estimation. Additionally, Washington's Consumer Protection Statute allows a \$2,000 penalty per violation to be assessed for every deceptive statement made at the discretion of the court. Washington intends to ask for the full \$2,000 penalty for statements distributed in Washington in the form of marketing documents. Washington will seek a minimum of \$302,872,000 in penalties for 110,436 deceptive statements disseminated in Washington after May 5, 2007. In addition, Washington will seek up to \$1,768,298,000 in penalties related to 224,285 individual sales calls conducted in Washington State by Purdue sales staff after May 5, 2007. Based on expert reports, those sales calls contained up to 3 misleading statements per call with an additional misrepresentation in OxyContin calls. The \$2,071,170,000 in penalties are in addition to the claimed amount related to damages and abatement costs.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/20 (mm/dd/yy)

ROBERT W. FERGUSON
Attorney General

By: /s/ Tad Robinson O'Neill
TAD ROBINSON O'NEILL
Assistant Attorney General
800 Fifth Ave., Suite 2000
Seattle, WA 98104
Email: tad.oneill@atg.wa.gov
Tel: 206-257-0504

Schedule 10.49 – West Virginia

In re Purdue Pharma, L.P., et al.

United States Bankruptcy Court

Southern District of New York

Case No.: 19-23649 (RDD)

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of West Virginia
2. Where should notices to the Claimant be sent?	Name: Ann L. Haight
	Address: 812 Quarrier Street, First Floor; P.O. Box 1789
	City: Charleston State: WV ZIP Code: 25326-1789
	Contact phone: (304) 558-8986
3. Notice to the Authorized Representatives	Contact email: Ann.L.Haight@wvago.gov
	Notices should also be sent to the Authorized Representatives.
Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of West Virginia ex rel. Patrick Morrissey, Attorney General, v. Purdue Pharma, L.P., a Delaware limited partnership, Purdue Pharma, Inc., a New York corporation, and Richard Sackler, M.D.
	Case Number: 19-C-62 BNE / MC 19-C-9000
	Court Name: Circuit Court of Kanawha County, West Virginia
	Date the Complaint was filed: May 16, 2019
	Was the Complaint sealed at filing? No
	If so, does the Complaint remain under seal?
	Causes of action asserted in the Complaint:
1. West Virginia Consumer Credit Protection Act violations	
2. Common Law Nuisance	

5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	West Virginia also asserts, as authorized, permitted, or required by applicable law, the claims of any individuals for whom West Virginia acts or may act under its parens patriae power, such as children suffering from neonatal abstinence syndrome.
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$44,286,000,000

[balance of page intentionally left blank]

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

By executing this Supplement, West Virginia reserves all rights to assert any positions it deems necessary to protect its interests, including, but not limited to, positions with respect to allocations of distributed amounts to be negotiated amongst the State and Territory Claimants.

Executed on: 07/30/2020

Patrick Morrissey
Attorney General for the State of West Virginia

By: /s/ Ann L. Haight
Ann L. Haight
Deputy Attorney General
Consumer Protection Division
812 Quarrier Street, First Floor
Post Office Box 1789
Charleston, West Virginia 25326-1789
Telephone: 304-558-8986
Fax: 304-558-0184
Email: Ann.L.Haight@wvago.gov

Schedule 10.50 - Wisconsin

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Wisconsin
2. Where should notices to the Claimant be sent?	Name: Laura E. McFarlane
	Address: Post Office Box 7857
	City: Madison State: WI ZIP Code: 53707-7857
	Contact phone: (608) 266-8911
	Contact email: mcfarlanele@doj.state.wi.us
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: State of Wisconsin v. Purdue Pharma L.P., Purdue Pharma Inc., and Richard S. Sackler
	Case Number: 2019CX9, 2019CX9A, and 2019CX9B
	Court Name: Dane County Circuit Court
	Date the Complaint was filed: May 16, 2019
	Was the Complaint sealed at filing? No
	If so, does the Complaint remain under seal? N/A

Causes of action asserted in the Complaint:	
1.	Violation of Wis. Stat. § 100.18(1)
2.	Violation of Wis. Stat. § 100.182(2)
3.	Public Nuisance
5.	In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:
6.	<div>Supporting Documentation:</div> <div>In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.</div>
7.	<div>Claim Amount⁴</div> <div>\$33,417,000,000</div>

Part 3: Sign Below	
8.	<div>The person completing this authorization form must sign and date it.</div> <div>I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.</div> <div>Executed on: <u>07/30/2020</u></div> <div>JOSHUA L. KAUL Attorney General of Wisconsin</div> <div>By: <u>/s/ Laura E. McFarlane</u> Laura E. McFarlane Assistant Attorney General Wisconsin Department of Justice Post Office Box 7857 Madison, Wisconsin 53707-7857</div>

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

(608) 266-8911
mcfarlanele@doj.state.wi.us

Schedule 10.51 - Wyoming

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: State of Wyoming
2. Where should notices to the Claimant be sent?	Name: Bridget Hill
	Address: 2320 Capitol Ave.
	City: Cheyenne State: WY ZIP Code: 82002
	Contact phone: (307) 777-7841
	Contact email: ben.burningham@wyo.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint	Case Name: State of Wyoming, ex rel., Peter K. Michael, Attorney General v. Purdue Pharma L.P., Purdue Pharma Inc., The Purdue Frederick Company.
	Case Number: 190-576

(the “ <u>Complaint</u> ”) against the Debtors:	Court Name: First Judicial District Court, Laramie County Wyoming	
	Date the Complaint was filed: Oct. 18, 2018	
	Was the Complaint sealed at filing? No	
	If so, does the Complaint remain under seal? N/A	
Causes of action asserted in the Complaint:		
<ol style="list-style-type: none"> 1. Misrepresentation of Sponsorship, Approval or Use, Wyo. Stat. Ann. § 40-12-105(a)(i) 2. Unfair Acts or Practices, Wyo. Stat. Ann. § 40-12-105(a)(xv) 3. Deceptive Acts or Practices, Wyo. Stat. Ann. § 40-12-105(a)(xv) 4. Medicaid False Claims Act, Wyo. Stat. Ann. § 42-4-303 		
<ol style="list-style-type: none"> 5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action: 6. Supporting Documentation: 	<ol style="list-style-type: none"> 1. Intentional (Fraudulent) or Negligent Misrepresentation 2. Public Nuisance 	<p>In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.</p>
7. Claim Amount ⁴	\$3,604,000,000	

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/20 (mm/dd/yy)

Bridget Hill
Attorney General for the State of Wyoming

/s/ Bridget Hill
Bridget Hill
Attorney General
State of Wyoming
2320 Capitol Ave.
Cheyenne, WY 82002
(307) 777-7841

Schedule 10.52 - American Samoa

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: American Samoa
2. Where should notices to the Claimant be sent?	Name: Jason Mitchell
	Address: Assistant Attorney General Director of the Bureau of Consumer Protection POB 7
	City: Pago Pago State: AS ZIP Code: 96799
	Contact phone: 684-633-4163
	Contact email: mitchellj@la.as.gov; consumer@la.as.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name:
	Case Number:
	Court Name:

Date the Complaint was filed:	
Was the Complaint sealed at filing?	
If so, does the Complaint remain under seal?	
Causes of action asserted in the Complaint:	
<p>5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:</p> <p>6. Supporting Documentation:</p>	<p>1. Unjust Enrichment</p> <p>2. Common Law Fraud</p> <p>In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.</p>
7. Claim Amount ⁴	\$105,396,000

Part 3: Sign Below	
<p>8. The person completing this authorization form must sign and date it.</p>	<p>I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.</p> <p>Executed on: <u>07/30/2020</u></p> <p>Mitzie Jessop Taase Acting Attorney General for the Territory of American Samoa</p>

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

By: /s/ Jason Mitchell
Jason Mitchell
Assistant Attorney General
Director of the Bureau of Consumer Protection
POB 7
Pago Pago, AS 96799
684-633-4163
mitchellj@la.as.gov
consumer@la.as.gov

Schedule 10.53 – Guam

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: Territory of Guam
2. Where should notices to the Claimant be sent?	Name: Fred Nishihira
	Address: 590 South Marine Corps Drive Suite 901, ITC Building
	City: Tamuning State: Guam ZIP Code: 96913
	Contact phone: (671) 475-3324
	Contact email: fnishihira@oagguam.org
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name: Territory of Guam v. Purdue Pharma L.P.; Purdue Pharma Inc.; The Purdue Frederick Company, Inc.; and Purdue Transdermal Technologies L.P.
	Case Number: Civil Case No. CV1020-19
	Court Name: The Superior Court of Guam Hagatna, Guam
	Date the Complaint was filed: August 20, 2019

Was the Complaint sealed at filing? No	
If so, does the Complaint remain under seal?	
Causes of action asserted in the Complaint:	
Violations of Guam's Deceptive Trade Practices - Consumer Protection Act, and Fraud	
5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:	
6. Supporting Documentation:	In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.
7. Claim Amount ⁴	\$415,398,000

Part 3: Sign Below	
8. The person completing this authorization form must sign and date it.	<p>I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.</p> <p>Executed on: <u>07/30/2020</u></p> <p>LEEVIN TAITANO CAMACHO Attorney General</p>

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

By: /s/ Fred Nishihira
Fred Nishihira
Deputy Attorney General
Consumer Protection Division
590 South Marine Corps Drive,
Suite 901, ITC Building
Tamuning, Guam 96913 ▪ USA
Telephone: (671) 475-3324
Facsimile: (671) 472-2493
Email: fnishihira@oagguam.org

ATTORNEYS FOR THE TERRITORY OF GUAM

Schedule 10.54 – Northern Mariana Islands

In re Purdue Pharma, L.P., et al.

United States Bankruptcy Court

Southern District of New York

Case No.: 19-23649 (RDD)

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: Commonwealth of the Northern Mariana Islands
2. Where should notices to the Claimant be sent?	Name: Lillian Ada Tenorio Deputy Attorney General, Office of the Attorney General
	Address: Caller Box 10007. 2nd Floor, Juan A. Sablan Memorial Building
	City: Saipan State: MP ZIP Code: 96950
	Contact phone: 670-237-7500
	Contact email: deputy_ag@cnmioag.org
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name:
	Case Number:
	Court Name:

	Date the Complaint was filed:
	Was the Complaint sealed at filing?
	If so, does the Complaint remain under seal?
	Causes of action asserted in the Complaint:
<p>5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:</p>	<p>1. Violation of 4 CMC Section 5101 et seq. of the Unlawful Act or Practices of the Consumer Protection Act including but not limited to subsection (m) which makes unlawful any act or practice which is unfair or deceptive to the consumer.</p> <p>2. Additional claims for relief under applicable common law or equity including but not limited to disgorgement of profits in order to prevent unjust enrichment.</p>
<p>6. Supporting Documentation:</p>	<p>In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.</p>

7. Claim Amount⁴

\$36,668,000

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/20 (mm/dd/yy)

Edward Manibusan
Attorney General for the Northern Mariana Islands

By: /s/ Lillian Ada Tenorio
Lillian Ada Tenorio
Deputy Attorney General
Office of the Attorney General
Caller Box 10007
2nd Flr., Juan A. Sablan Memorial Building
Saipan, MP 96950
Tel: (670) 237-7500
Email: deputy_ag@cnmioag.org

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Schedule 10.55 – Puerto Rico

In re Purdue Pharma, L.P., et al.

**United States Bankruptcy Court
Southern District of New York
Case No.: 19-23649 (RDD)**

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: The Government of Puerto Rico
2. Where should notices to the Claimant be sent?	Name: Johan Rosa Rodriguez
	Address: P.O. Box 9020192
	City: San Juan State: PR ZIP Code: 00902-0192
	Contact phone: (787) 721-2900
	Contact email: jorosa@justicia.pr.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint	Case Name: The Government of Puerto Rico v. Purdue Pharma, L.P., Purdue Pharma, Inc., The Purdue Fredrick Company, Purdue Pharma de Puerto Rico, Jane Does 1-10.
	Case Number: SJ2018CV01659

(the “ <u>Complaint</u> ”) against the Debtors:	Court Name: The Commonwealth of Puerto Rico, Court of First Instance, Superior Court, San Juan Part.
	Date the Complaint was filed: March 27, 2018, Amended April 26, 2018.
	Was the Complaint sealed at filing? No
	If so, does the Complaint remain under seal? N/A
	Causes of action asserted in the Complaint: <ol style="list-style-type: none"> 1. The Fair Competition Act, L.P.R.A. § 259; 2. Public Nuisance, 32 L.P.R.A. § 2761 and 32 L.P.R.A. § 3532; 3. Fault/Negligence, 31 L.P.R.A. § 5141; and 4. Unjust Enrichment.
<p>5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:</p> <p>6. Supporting Documentation:</p>	<p>In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.</p>
7. Claim Amount ⁴	\$4,710,000,000

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/20 (mm/dd/yy)

Ines Carrau Martinez
Interim Secretary of Justice

/s/ Johan Rosa Rodríguez
Johan Rosa Rodríguez
Secretaria Auxiliar
Puerto Rico Department Of Justice
P.O. Box 9020192
San Juan, Puerto Rico 00902-0192
Tel: (787) 721-2900
jorosa@justicia.pr.gov

Schedule 10.56 - U.S. Virgin Islands

In re Purdue Pharma, L.P., et al.

United States Bankruptcy Court

Southern District of New York

Case No.: 19-23649 (RDD)

**INDIVIDUAL STATE/TERRITORY SUPPLEMENT TO CONSOLIDATED
CLAIM AND AUTHORIZATION FORM**

The undersigned State/Territory of the United States of America (collectively, the “States and Territories”) is a claimholder (the “Claimant”) in the bankruptcy cases of *In re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.). Claimant hereby elects to schedule and file any and all claims it holds against the Debtors¹ as part of a consolidated claim of the States and Territories (the “Consolidated Claim”²), which is being filed in accordance with the Orders entered by the United States Bankruptcy Court for the Southern District of New York (the “Court”) establishing the deadline and procedures for all persons and entities, including, without limitation, all governmental units, for filing proofs of claim against any of the Debtors (the “Bar Date Order”)³ [Dkt. Nos. 800, 1221].

The Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, all applicable information in the Consolidated Claim Summary Information Sheet, and any appendices thereto, as amended, modified and/or supplemented, is incorporated herein, and the Consolidated Claim and this Supplement will be treated as the Claimant’s own Proof of Claim filed against each of the Debtors, and the Claimant agrees to be so bound for all Proof of Claim purposes. This Supplement shall be deemed incorporated into and made part of the Consolidated Claim, including any Additional Theories asserted in this Supplement.

The Claimant asserts all theories and causes of action identified in the Consolidated Claim and in the lawsuits identified by each Claimant in this Supplement, which are subject in all respects to the reservations set forth in the document titled “Attachment

¹ Purdue Pharma L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield BioVentures L.P., Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma LP, SVC Pharma Inc. (collectively, the “Debtors”).

² Capitalized terms used but not defined herein have the meanings given in the Attachment (defined below).

³ On June 3, 2020, the Court entered an Order extending the general bar date from June 30, 2020 to July 30, 2020 at 5:00 p.m. (Eastern Time).

to Consolidated Proof of Claim of States, Territories and Other Governmental Entities” annexed to the Consolidated Claim (the “Attachment”).

The Claimant hereby authorizes Melanie L. Cyganowski and Andrew M. Troop (the “Authorized Representatives”) to submit the Consolidated Claim on Claimant’s behalf and to receive notices in connection with this Supplement.

The below information is intended to supplement the information contained in the Consolidated Claim, which as stated above, Claimant is relying upon in making its claims, and to provide information specific to that of the Claimant.

Part 1: Identify the Claimant	
1. Name of Claimant.	Name: U.S. Virgin Islands
2. Where should notices to the Claimant be sent?	Name: Carol Thomas-Jacobs, Esq. Chief Deputy Attorney General, Virgin Islands Department of Justice
	Address: Office of the Attorney General 34-38 Kronprindsens Gade, GERS Building, 2nd Floor
	City: St. Thomas State: USVI ZIP Code: 00801
	Contact phone: (340) 774-5666 ext. 10101
	Contact email: carol.jacobs@doj.vi.gov
3. Notice to the Authorized Representatives	Notices should also be sent to the Authorized Representatives.

Part 2: Information Regarding Lawsuits Commenced by Claimant Against the Debtors	
4. The Claimant has commenced a lawsuit by filing the following complaint (the “ <u>Complaint</u> ”) against the Debtors:	Case Name:
	Case Number:
	Court Name:

Date the Complaint was filed:

Was the Complaint sealed at filing?

If so, does the Complaint remain under seal?

Causes of action asserted in the Complaint:

5. In addition to the causes of action set forth in the Complaint, the undersigned also identifies the following causes of action:

- 1. Civil violations of the Virgin Islands Criminally Influenced and Corrupt Organizations Act. The defendants engaged in conduct that violated the Virgin Islands Criminally Influenced and Corrupt Organizations Act, 14 V.I.C. § 600, et seq. The Purdue CICO enterprise is an association-in-fact of individuals and corporate entities within the meaning of 14 V.I.C. § 604(h) and consists of persons associated together for a common purpose of marketing, promoting and misrepresenting OxyContin as a “less addictive” drug and to conceal the true nature and extent of OxyContin’s addictive qualities.**
- 2. Unfair and Deceptive Trade Practices. Title 12A V.I. C. §101 provides that “[n]o person shall engage in any deceptive or unconscionable trade practices in the sale, lease, rental or loan, or in the offering of sale, lease, rental or loan of any consumer goods or services, or in the collection of consumer debts.” Defendants made numerous deceptive statements about the nature of OxyContin.**
- 3. Consumer Fraud. Title 12A V.I. C. §304 provides that “[i]t is unlawful for any person to engage in unfair methods of competition or unfair deceptive trade acts or practices in the conduct of any trade or commerce.” Defendants issued numerous deceptive and misleading statements about OxyContin.**
- 4. Public Nuisance. Defendants engaged in conduct which involves a significant interference with the public health and, therefore, their conduct constitutes a public nuisance. Defendants’ conduct placed many Virgin Islanders at risk of harm or harmed many Virgin**

Islanders. Defendants knew or reasonably should have know that the highly additive nature of OxyContin would unreasonably interfere with the public health and thereby constitute a nuisance. They expended considerable effort to conceal the true nature of OxyContin from the public. As a result of Defendants' actions, the Government of the Virgin Islands incurred considerable healthcare and other costs in addressing the OxyContin epidemic.

- 5. Fraudulent Concealment. Defendants knew of the addictive qualities of OxyContin but failed to disclose that information to regulators and the public and, in fact, concealed and misrepresented the true extent of OxyContin's powerful addictive qualities.**

6. Supporting
Documentation:

In lieu of uploading or submitting the Complaint, the Claimant authorizes the Debtors to make the Complaint available to Prime Clerk, the Court, and any party who agrees to be bound by the Protective Order entered in these chapter 11 cases.

7. Claim Amount⁴ **\$283,868,000**

Part 3: Sign Below

8. The person completing this authorization form must sign and date it.

I have examined the information in the Consolidated Claim (excluding Supplements relating to other jurisdictions) and this Supplement, and I have a reasonable basis to believe and understand that the information is true and correct. By authorizing my electronic signature to be affixed below, I acknowledge that I am authorizing the Authorized Representatives to submit the Consolidated Claim and this Supplement on the Claimant's behalf. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/30/20 (mm/dd/yy)

⁴ Plus unliquidated amounts for the Collective Theories set forth in the Attachment.

Denise N. George, Esq.
Attorney General for the U.S. Virgin Islands

By: /s/Carol Thomas-Jacobs
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