

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

**This document relates to:**

*The County of Summit, Ohio, et al., v.  
Purdue Pharma L.P., et al., Case No. 18-OP-  
45090 (N.D. Ohio)*

*The County of Cuyahoga v. Purdue Pharma  
L.P., et al., Case No. 17-OP-45004 (N.D.  
Ohio); and*

*City of Cleveland v. AmerisourceBergen  
Drug Corp., et al., Case No. 18-OP-45132  
(N.D. Ohio).*

**MDL No. 2804**

**Case No. 17-md-2804**

**Judge Dan Aaron Polster**

**WRITTEN RESPONSES OF DEFENDANTS CEPHALON, INC.,  
TEVA PHARMACEUTICALS USA, INC., ACTAVIS LLC, ACTAVIS  
PHARMA, INC., AND WATSON LABORATORIES, INC. TO PLAINTIFFS'  
FOURTH AMENDED NOTICE OF DEPOSITION PURSUANT TO RULE 30(B)(6)**

Defendants Cephalon, Inc. (“Cephalon”) and Teva Pharmaceuticals USA, Inc. (“Teva Pharmaceuticals”) (collectively referred to as “Teva”), and Defendants Actavis LLC, Actavis Pharma, Inc. f/k/a Watson Pharma, Inc., and Watson Laboratories, Inc. (“the Teva-Acquired Actavis Entities”) (Teva and the Teva-Acquired Actavis Entities are collectively referred to as the “Teva Defendants”), by and through their undersigned counsel, hereby provide the following written responses to Topics 2, 9, 12, 13, 15, 16, 17, 22, 31, 32, 42, 46, and 49 of Plaintiffs’ Fourth Amended Notice of Deposition Pursuant to Rule 30(b)(6) dated November 5, 2018 (“Notice”).

These responses are based on the Teva Defendants’ reasonable investigation as of the date of this response. The Teva Defendants may engage in further investigation, discovery, and analysis, which may lead to changes in the Teva Defendants’ responses herein. Such investigation

PLAINTIFFS TRIAL  
EXHIBIT

**P-28001\_00001**

and discovery are continuing, and the responses are given without prejudice to the Teva Defendants' right to produce evidence of any subsequently-discovered facts or interpretations thereof, or to supplement, modify, change, or amend the responses, and to correct for errors, mistakes, or omissions.

### **WRITTEN RESPONSES**

The Teva Defendants incorporate their Objections to Definitions, Objections to Relevant Time Period, General Objections, and Objections to Subject Matters for Testimony, as set forth in their letter from R. Hillyer to M. Crawford dated July 27, 2018. The Teva Defendants are providing these responses in lieu of oral testimony and with the understanding that no Rule 30(b)(6) deposition will cover the substance of these topics.

Subject to and without waiver of the foregoing objections, the Teva Defendants respond as follows:

#### **TOPIC NO. 2:**

The Persons holding executive and high-level management positions in Your sales, Marketing, research and development, compliance, budgeting and finance departments or divisions. This includes the identity of the Persons who lead Your divisions (or other organizational unit) in the following areas or positions (or title equivalent) to the following categories:

- a. Chief Executive Officer;
- b. President;
- c. Chief Financial Officer;
- d. Chief Operating Officer;
- e. General Counsel;
- f. Sales;
- g. Marketing
- h. Compliance;
- i. Sales or Marketing Training;
- j. Government Affairs;
- k. Regulatory Affairs;
- l. Pharmacovigilance and Drug Safety;
- m. Medical Director; and
- n. Research and Development.

**RESPONSE TO TOPIC NO. 2:**

Plaintiffs' Topic No. 2 asks for information about officers with specific titles or the functional equivalent. The Teva Defendants provide information below, but they note that they do not use all of the listed titles or a functional equivalent. For purposes of this response, the Teva Defendants have attempted to identify the individuals who most closely correspond to the titles listed in this topic, but the Teva Defendants note that actual titles may not align exactly with the titles used by Plaintiffs.

**Cephalon, Inc.**

- a. Chief Executive Officer: Frank Baldino, Jr. (1987 – 2010); J. Kevin Buchi (2011)
- c. Chief Financial Officer: J. Kevin Buchi (1996 – 2009); Wilco Groehuysen (2010 – 2011)
- d. Chief Operating Officer: J. Kevin Buchi (2010)
- e. General Counsel: John E. Osborn (1998 – 2008); Gerald J. Pappert (2008 – 2011)
- f. Sales: Roy Craig [Vice President, Sales] (2003 – 2006); Andrew Pyfer [National Sales Director, Pain Care Division] (2008 – 2009); Thomas Rainey [VP Pain Care Sales] (2010 – 2011); James J. Reilly [Vice President, Sales] (2007 – 2011); Christopher Meyer [Director Sales Force Planning & Operations] (2000 – 2011)
- g. Marketing: Lynne Brookes [Vice President, Marketing] (2003 – 2007); Scott Megaffin [Vice President, Marketing – Pain] (2008); William Campbell [Vice President, Marketing – Pain] (2009 – 2011); Jerri Ann Thatcher [Senior Director Marketing, Fentora] (2010 – 2011)
- h. Compliance: Eric H. Siegel (2004 – 2007); Valli Baldassano (2007 – 2011)

i. Sales or Marketing Training: Daniel Scott [Senior Director, Sales Training & Development] (2003 – 2011); Joseph Caminiti [Vice President, Sales & Marketing Operations and Excellence] (2007 – 2011)

j. Government Affairs: Scott Melville (2003 – 2004); Jeff Myers (2005 – 2009); Fritz Bittenbender (2009 – 2011)

k. Regulatory Affairs: Paul Blake [Executive Vice President, Worldwide Medical & Regulatory Operations] (2003 – 2006); Lesley Russell [Executive Vice President, Worldwide Medical & Regulatory Operations] (2007 – 2011)

l. Pharmacovigilance and Drug Safety: Richard Civil [Vice President, Global Product Safety & Corporate Safety Officer] (2003 – 2010); Mary Ellen Turner [Vice President, Global Pharmacovigilance and Epidemiology] (2011)

n. Research and Development: Jeffrey L. Vaught [Executive Vice President] (1991 – 2011)

**Teva Pharmaceuticals USA, Inc.**

a. Chief Executive Officer: William Fletcher (1996 – 2003); George Barrett (2003 – 2007); William S. Marth (2008 – 2013); Rob Koremans [Specialty] (2013 – 2015); Allan Oberman [Generics] (2013 – 2014); Brendan O’Grady [Generics] (2015 – 2016); Richard S. Egosi (2013 – 2014); Siggi Olafsson (2014 – 2016); Brendan O’Grady (2018 – present)

b. President: William Fletcher (1996 – 2003); George Barrett (2003 – 2007); William S. Marth (2008 – 2013); Larry Downey [Specialty] (2009 – 2018); Allan Oberman [Generics] (2013 – 2014); Brendan O’Grady [Generics] (2015 – 2016); Richard S. Egosi (2013 – 2014); Siggi Olafsson (2014 – 2016); Brendan O’Grady (2018 – present)

c. Chief Financial Officer: Peter Terreri [Senior Vice President, Finance and Manufacturing and CFO] (1996 – 1999); Richard Nase [Vice President, Finance and Chief Financial Officer] (2000); Vito Mairone [Vice President, Finance & Chief Financial Officer] (2001 – 2003); Mark Durand [Senior Vice President, Finance & Chief Financial Officer] (2004 – 2007); Deborah Griffin [Chief Accounting Officer] (2007 – present)

d. Chief Operating Officer: George Barrett [President – US Pharmaceuticals and COO] (1999 – 2002)

e. General Counsel: Beryl Snyder (1996 – 1998); Richard S. Egosi (1999 – 2014); David M. Stark (2016 – present)

f. Sales: Lawrence Rosenthal [Vice President, Generic Sales] (1996 – 1998); William Marth [Vice President, Marketing and Sales] (1999 – 2006); David Marshall [Vice President, Sales and Marketing] (2005 – 2009); Robert Cunard [Vice President, Sales] (2010); James J. Reilly [Vice President, Sales] (2011 – 2018); Thomas E. Rainey [Senior Vice President, Specialty Sales] (2018 – present); Christopher Meyer [Director Sales Force Planning & Operations] (2011 – present)

g. Marketing: Barry Edwards [VP Generic Marketing & B.D.] (1996 – 1998); William Marth [VP Marketing and Sales] (1999 – 2006); David Marshall [VP Sales and Marketing] (2005 – 2009); Jonathan Congleton [Senior Vice President & General Manager, Commercial Operations; Senior Vice President, Global Brand Strategy Marketing; Senior Vice President & Head Global CNS] (2010 – 2014); Michael M. Derkacz [Senior Vice President & Head Global CNS] (2015 – 2017); Timothy S. McFadden [Vice President, Marketing] (2018 – present)

h. Compliance: Michael D. Dearborn (2010 – 2015); Patricia G. Glover (2012 – present)

- i. Sales or Marketing Training: Cynthia Condodina (2011 – present)
- j. Government Affairs: Judith Milford (2002 – 2006); Debra Barrett (2007 – 2018); Dolly Judge (2018 – present)
- k. Regulatory Affairs: Douglas N. Dobak [Global Innovative RA] (2010); James G. Ottinger (2012 – 2017); Rivka R. Kreitman [Senior Vice President, Specialty Regulatory Affairs] (2018 – present)
- l. Pharmacovigilance and Drug Safety: Dennis P. Miley [Director, Drug Safety & Pharmacovigilance] (2010); Hedva Voliovitch (2012 – present)
- m. Medical Director: Jonathan Isaacsohn [Chief Medical Officer] (2012 – 2016); Marcelo E. Bigal [Chief Medical Officer] (2017 – 2018)
- n. Research and Development: Carole Ben-Maimon [Senior Vice President, R&D] (1996 – 2001); Christopher Pelloni [Vice President R&D] (2002 – 2008); Rivka R. Kreitman [Senior Vice President, Global Innovative R&D] (2010); Michael Hayden (2012 – present)

**Teva-Acquired Actavis Entities**

**Watson Laboratories, Inc.**

- a. Chief Executive Officer: Allen Chao (1992 – 2007); Paul M. Bisaro (2008 – 2012)
- b. President: Allen Chao (1992 – 2007); Paul M. Bisaro (2007 – 2012); G. Frederick Wilkinson (2012); A. Robert D. Bailey (2015); Karin Shanahan (2016-2017); Sergio Vella (2018)
- c. Chief Financial Officer: Albert F. Hummel [Treasurer and Secretary] (1992); Michael E. Boxer (2002 – 2003); Charles Slacik (2003 – 2006); Mark W. Durand (2007 – 2008); R. Todd Joyce (2009 – 2012)
- d. Chief Operating Officer: Joseph Papa (2002 – 2004); Patrick G. Brunner (2007 – 2012); Robert A. Stewart (2015)

e. General Counsel: Robert C. Funsten (1999 – 2002); David A. Buchen (2011 – 2012)

**Actavis, LLC (f/k/a Actavis Inc. (2005-2013))**

- a. Chief Executive Officer: Douglas Boothe (2008 – 2012); Paul M. Bisaro (2013)
- b. President: Robert Wessman (2005); Douglas Boothe (2009 – 2012); Paul M. Bisaro (2013); A. Robert D. Bailey (2015); Karin Shanahan (2016 – 2017); Sergio Vella (2018 – Present).
- c. Chief Financial Officer: Kevin Bain (2007 – 2008) [Vice President and Treasurer]; Stephen Gallagher (2010 – 2012) [Vice President and Treasurer]; R. Todd Joyce (2013 – 2014)
- d. Chief Operating Officer: Robert A. Stewart (2014)
- e. General Counsel: John LaRocca (2009, 2012) [Chief Legal Officer]

**Actavis Pharma, Inc. (f/k/a Watson Pharma, Inc. f/k/a Schein Pharmaceuticals, Inc.)**

**Actavis Pharma, Inc. (2013 – Present)**

- a. Chief Executive Officer: Paul M. Bisaro (2013 – 2014); Brent Saunders (2015)
- b. President: Paul M. Bisaro (2013 – 2014); A. Robert D. Bailey (2015); Andrew Boyer (2016 – 2017); Brendan O’Grady (2018)
- c. Chief Financial Officer: R. Todd Joyce (2013 – 2014); Maria Teresa Hilado (2015)

**Watson Pharma, Inc. (2001 – 2013)**

- a. Chief Executive Officer: Allen Chao (2001 – 2007); Paul M. Bisaro (2008 – 2012)
- b. President: Allen Chao (2001); Joseph Papa (2002 – 2004); Paul M. Bisaro (2008 – 2012); G. Frederick Wilkinson (2012)
- c. Chief Financial Officer: Michael Boxer (2001 – 2002); Charles Slacik (2003 – 2006); Mark W. Durand (2007 – 2008)
- d. Chief Operating Officer: Joseph Papa (2002 – 2004)

- e. General Counsel: Robert C. Funsten (2001); David A. Buchen (2005 – 2012)
- Schein Pharmaceuticals, Inc. (1993 – 2001)**
- a. Chief Executive Officer: Martin Sperber (1993, 1995, 1998); Allen Chao (2000 – 2001)
  - b. President: Allen Chao (2000 – 2001)
  - c. Chief Financial Officer: Michael Boxer (2000 – 2001)
  - d. Chief Operating Officer: Fred Wilkinson (2000)
  - e. General Counsel: Robert C. Funsten (2001)
  - f. Generics Sales: Alan Slavsky [Vice President of Sales – Watson/Actavis] (2000-2012); Michael Perfetto [Vice President Sales & Marketing – Actavis] (2003 – 2013); Michael Dorsey [Director of National Accounts – Actavis] (2007 – 2016); Nancy Baran [Executive Director, Customer Relations Operations – Actavis] (2008 – 2013); Ara Aprahamian [Director, Pricing and Contracts – Actavis] (2010 – 2013); Andy Boyer [Vice President, Sales & Marketing – Watson/Actavis] (2002 – 2016)
  - g. Generics Marketing: Mark Falkin [Vice President, Marketing, Pricing & Contracts – Actavis] (2013 – 2016); Jinping McCormick [Director of Product Marketing – Actavis] (2008 – 2013); Napoleon Clark [Executive Director of Marketing – Watson/Actavis] (2011 – 2016); Diane Miranda [Vice President, Sales Operations & Distribution; Vice President, Generic Marketing & Operations – Watson/Actavis] (2000 – 2011); Steven Goodman [Vice President, Marketing – Watson] (2005 – 2008)
  - h. Compliance: Tom Napoli [Associate Director Controlled Substance Compliance – Actavis] (2013 – 2016); Michael Clarke [Vice President of Ethics & Compliance – Actavis] (2012 – 2015); Nasrat Hakim [Vice President, Quality, Compliance & Technical Services – Actavis]



(2009 – 2013); Deborah Penza [Chief Compliance Officer – Watson/Actavis] (2011 – 2015); Roberta Loomar [Watson] (2008 – 2010); Deborah Penza [Watson] (2011 – 2012); Joseph Zimmerman [Actavis] (2014); Jonathon Kellerman [Actavis] (2015 – 2016)

i. Sales or Marketing Training: Not applicable to generics products for Teva-Acquired Actavis Entities.

j. Government Affairs: G. Thomas Long [Watson] (2004 – 2010); Charlie Mayr [Watson] (2011 – 2012); Charlie Mayr [Actavis] (2013 – 2014); Alex Kelly [Actavis] (2015 – 2016)

k. Regulatory Affairs: Terri Nataline [Vice President Regulatory Affairs and Medical Affairs – Actavis] (2008 – 2013); Beth Brannan [Vice President Regulatory Affairs – Watson] (2008 – 2016); Jasmine Shah [Vice President, Regulatory Affairs and Medical Affairs – Actavis] (2005 – 2008)

l. Pharmacovigilance and Drug Safety: Ralph Bobo [Executive Director of Pharmacovigilance – Actavis] (2010 – 2015); Sarita Thapar [Director of Pharmacovigilance – Actavis] (2005 – 2014)

m. Medical Director: Jeanette Barrett, Ph.D. [Senior Medical Director – Actavis] (2012 – 2013); Gary Kozloski [Watson] (2001 – 2012); Gavin Corcoran [Actavis] (2014 – 2016)

n. Research and Development: Hafrun Fridriksdottir [Senior Vice President, Research and Development – Actavis] (2015 – 2016); Meena Venugopal [Executive Director – Actavis] (2013 – 2014); Scott Gochnour [Executive Director, Research and Development; Vice President Global Generics Research and Development – Watson/Actavis] (2002 – 2011; 2015 – 2016); Charles Ebert [Watson] (1999 – 2012); Francois Menard [Watson] (2007 – 2012); David Nicholson [Actavis] (2015 – 2016)

**TOPIC NO. 9:**

The Identity of the Persons responsible for setting compensation for Your sales force and the components of that compensation for each year:

**RESPONSE TO TOPIC NO. 9:**

Chris Meyer (Teva Senior Director, Sales Analytics and Incentive Compensation 2016 – present (formerly with Cephalon)) is responsible for setting sales force compensation for Teva branded opioid products and components of that compensation for branded products. Other persons who have been responsible for setting sales force compensation for Teva branded opioid products include Dana Luscombe (Director of Sales Force Automation, Incentive Compensation & Oncology Sales Operations, Cephalon, 2001 – 2011), and Kent Schurr (Manager/Senior Manager, Sales Reporting & Incentive Compensation, Cephalon, 2004 – 2011; Senior Manager, Incentive Compensation, Teva, 2011 – 2016; Compensation Manager, Total Rewards 2016 – 2018).

Chris Doerr (Teva Associate Director, Trade Operations, 2012 – 2014; Senior Director, Trade Operations 2014 – 2017; Vice President, Trade Relations & Distribution Strategy, 2017 – present (formerly with Cephalon)) is responsible for setting sales force compensation for the Teva generic opioids products and components of that compensation. Other persons who have been responsible for setting sales force compensation for the Teva generic opioids products and components of that compensation include Marc Falkin (Teva Senior Vice President, US Generic Sales, 2016 – present (formerly with Actavis)) and David Rekenhaller (Teva Vice President, Sales, 2006 – 2015).

The components of compensation for the sales force relating to Teva branded opioid products can be found in the Teva Defendants' productions as follows:

- The Cephalon Q4 2006 Fentora Incentive Compensation Plan for Pain Care Area Managers can be found at TEVA\_MDL\_A\_00455101.
- The Cephalon Q4 2006 Fentora Incentive Compensation Plan for PCS Market Development Manager can be found at TEVA\_MDL\_A\_00455105.
- The Cephalon Q4 2006 Fentora Incentive Compensation Plan for PCS Regional Director can be found at TEVA\_MDL\_A\_00455111.
- The Cephalon Q4 2006 Fentora Incentive Compensation Plan for Pain Care Specialist can be found at TEVA\_MDL\_A\_00455118.
- The Cephalon Q1 2007 Fentora Incentive Compensation Plan for Pain Care Area Manager can be found at TEVA\_MDL\_A\_00455121.
- The Cephalon Q2 2007 Fentora Incentive Compensation Plan for Pain Care Area Manager can be found at TEVA\_MDL\_A\_00455122.
- The Cephalon Q3 2007 Fentora Incentive Compensation Plan for Pain Care Area Manager can be found at TEVA\_MDL\_A\_00455123.
- The Cephalon Q4 2007 Fentora Incentive Compensation Plan for Pain Care Area Manager can be found at TEVA\_MDL\_A\_00455124.
- The Cephalon Q1 2007 Fentora Incentive Compensation Plan for Pain Care Market Development Manager can be found at TEVA\_MDL\_A\_00455125.
- The Cephalon Q2 2007 Fentora Incentive Compensation Plan for Pain Care Market Development Manager can be found at TEVA\_MDL\_A\_00455126.
- The Cephalon Q3 2007 Fentora Incentive Compensation Plan for Pain Care Market Development Manager can be found at TEVA\_MDL\_A\_00455127.

- The Cephalon Q4 2007 Fentora Incentive Compensation Plan for Pain Care Market Development Manager can be found at TEVA\_MDL\_A\_00455128.
- The Cephalon Q1 2007 Fentora Incentive Compensation Plan for Pain Care Regional Director can be found at TEVA\_MDL\_A\_00455129.
- The Cephalon Q2 2007 Fentora Incentive Compensation Plan for Pain Care Regional Director can be found at TEVA\_MDL\_A\_00455130.
- The Cephalon Q3 2007 Fentora Incentive Compensation Plan for Pain Care Regional Director can be found at TEVA\_MDL\_A\_00455131.
- The Cephalon Q4 2007 Fentora Incentive Compensation Plan for Pain Care Regional Director can be found at TEVA\_MDL\_A\_00455132.
- The Cephalon Q4 2007 Fentora Incentive Compensation Plan for Pain Care Specialist can be found at TEVA\_MDL\_A\_00455133.
- The Cephalon Q1 2007 Fentora Incentive Compensation Plan for Pain Care Specialist can be found at TEVA\_MDL\_A\_00455136.
- The Cephalon Q2 2007 Fentora Incentive Compensation Plan for Pain Care Specialist can be found at TEVA\_MDL\_A\_00455138.
- The Cephalon Q3 2007 Fentora Incentive Compensation Plan for Pain Care Specialist can be found at TEVA\_MDL\_A\_00455140.
- The Cephalon Q1 2008 Fentora Incentive Compensation Plan for Pain Care Area Manager can be found at TEVA\_MDL\_A\_00455142.
- The Cephalon Q2 2008 Fentora Incentive Compensation Plan for Pain Care Area Manager can be found at TEVA\_MDL\_A\_00455143.

- The Cephalon Q3 2008 Fentora Incentive Compensation Plan for Pain Care Area Manager can be found at TEVA\_MDL\_A\_00455144.
- The Cephalon Q4 2008 Fentora Incentive Compensation Plan for Pain Care Area Manager can be found at TEVA\_MDL\_A\_00455145.
- The Cephalon Q1 2008 Fentora Incentive Compensation Plan for Pain Care Specialist can be found at TEVA\_MDL\_A\_00455146.
- The Cephalon Q2 2008 Fentora Incentive Compensation Plan for Pain Care Specialist can be found at TEVA\_MDL\_A\_00455149.
- The Cephalon Q3 2008 Fentora Incentive Compensation Plan for Pain Care Specialist can be found at TEVA\_MDL\_A\_00455152.
- The Cephalon Q4 2008 Fentora Incentive Compensation Plan for Pain Care Specialist can be found at TEVA\_MDL\_A\_00455155.
- The Cephalon Q1 2009 Fentora Incentive Compensation Plan for Pain Care Area Manager can be found at TEVA\_MDL\_A\_00455158.
- The Cephalon Q2 2009 Fentora Incentive Compensation Plan for Pain Care Area Manager can be found at TEVA\_MDL\_A\_00455159.
- The Cephalon Q3 2009 Fentora Incentive Compensation Plan for Pain Care Area Manager can be found at TEVA\_MDL\_A\_00455160.
- The Cephalon Q4 2009 Fentora Incentive Compensation Plan for Pain Care Area Manager can be found at TEVA\_MDL\_A\_00455161.
- The Cephalon Q1 2009 Fentora Incentive Compensation Plan for Pain Care Regional Director can be found at TEVA\_MDL\_A\_00455162,

- The Cephalon Q2 2009 Fentora Incentive Compensation Plan for Pain Care Regional Director can be found at TEVA\_MDL\_A\_00455163.
- The Cephalon Q3 2009 Fentora Incentive Compensation Plan for Pain Care Regional Director can be found at TEVA\_MDL\_A\_00455164.
- The Cephalon Q4 2009 Fentora Incentive Compensation Plan for Pain Care Regional Director can be found at TEVA\_MDL\_A\_00455165.
- The Cephalon Q1 2009 Fentora Incentive Compensation Plan for Pain Care Specialist can be found at TEVA\_MDL\_A\_00455166.
- The Cephalon Q2 2009 Fentora Incentive Compensation Plan for Pain Care Specialist can be found at TEVA\_MDL\_A\_00455169.
- The Cephalon Q3 2009 Fentora Incentive Compensation Plan for Pain Care Specialist can be found at TEVA\_MDL\_A\_00455172.
- The Cephalon Q4 2009 Fentora Incentive Compensation Plan for Pain Care Specialist can be found at TEVA\_MDL\_A\_00455176.
- The Cephalon Q1 2010 Fentora Incentive Compensation Plan for Pain Care Area Manager can be found at TEVA\_MDL\_A\_00455181.
- The Cephalon Q2 2010 Fentora Incentive Compensation Plan for Pain Care Area Manager can be found at TEVA\_MDL\_A\_00455182.
- The Cephalon Q3 2010 Fentora Incentive Compensation Plan for Pain Care Area Manager can be found at TEVA\_MDL\_A\_00455183.
- The Cephalon Q1 2010 Fentora Incentive Compensation Plan for Pain Care Regional Director can be found at TEVA\_MDL\_A\_00455184.

- The Cephalon Q2 2010 Fentora Incentive Compensation Plan for Pain Care Regional Director can be found at TEVA\_MDL\_A\_00455185.
- The Cephalon Q3 2010 Fentora Incentive Compensation Plan for Pain Care Regional Director can be found at TEVA\_MDL\_A\_00455186.
- The Cephalon Q1 2010 Fentora Incentive Compensation Plan for Pain Care Specialist can be found at TEVA\_MDL\_A\_00455187.
- The Cephalon Q2 2010 Fentora Incentive Compensation Plan for Pain Care Specialist can be found at TEVA\_MDL\_A\_00455191.
- The Cephalon Q3 2010 Fentora Incentive Compensation Plan for Pain Care Specialist can be found at TEVA\_MDL\_A\_00455195.
- The Cephalon First Semester 2011 Fentora Incentive Compensation Plan for Pain Care Area Manager can be found at TEVA\_MDL\_A\_00406534.
- The Cephalon Second Semester 2011 Fentora Incentive Compensation Plan for Pain Care Area Manager can be found at TEVA\_MDL\_A\_00406538.
- The Cephalon First Semester 2011 Fentora Incentive Compensation Plan for Pain Care Specialist can be found at TEVA\_MDL\_A\_00406548.
- The Cephalon Second Semester 2011 Fentora Incentive Compensation Plan for Pain Care Specialist can be found at TEVA\_MDL\_A\_00406561.
- The Cephalon First Semester 2011 Fentora Incentive Compensation Plan for Pain Care Regional Director can be found at TEVA\_MDL\_A\_00406555.
- The Cephalon Second Semester 2011 Fentora Incentive Compensation Plan for Pain Care Regional Director can be found at

- The Teva 2012 Annual Incentive Plan for Pain Care Sales Specialists can be found at TEVA\_MDL\_A\_00406383.
- The Teva 2013 Annual Incentive Plan for Pain Care Area Sales Director can be found at TEVA\_MDL\_A\_00406389.
- The Teva 2013 Annual Incentive Plan for Pain Care Regional Sales Manager can be found at TEVA\_MDL\_A\_00406394.
- The Teva 2013 Annual Incentive Plan for Pain Care Sales Specialist can be found at TEVA\_MDL\_A\_00406399.
- The Teva 2014 Annual Incentive Plan for Pain Care Area Sales Director can be found at TEVA\_MDL\_A\_00406411.
- The Teva 2014 Annual Incentive Plan for Pain Care Regional Sales Manager can be found at TEVA\_MDL\_A\_00406416.
- The Teva 2014 Annual Incentive Plan for Pain Care Sales Specialist can be found at TEVA\_MDL\_A\_0040642.
- The Teva 2015 Annual Incentive Plan for Pain Care Area Sales Director can be found at TEVA\_MDL\_A\_00406516.
- The Teva 2015 Annual Incentive Plan for Pain Care Regional Sales Manager can be found at TEVA\_MDL\_A\_00406521.
- The Teva 2015 Annual Incentive Plan for Pain Care Sales Specialist can be found at TEVA\_MDL\_A\_00406526.
- The Teva Q4 2016 Fentora Promotional Outreach Program Plan can be found at TEVA\_MDL\_A\_03438159.



The following persons were responsible for setting sales force compensation for Teva generic products, including generic opioids:

- Chris Doerr (Vice President, Trade Operations & Distribution Strategy 2017-Present)
- Daniel Solomon (Vice President, IDNs and Institutional Accounts 2017-2018)
- Andy Boyer (President and CEO, Teva North America Generics 2016-2018)
- Marc Falkin (Senior Vice President, US Generic Sales 2016-2018)
- Brendan O'Grady (President and CEO Teva North America Generics 2015-2016)
- Sigurdur Olafsson (President and CEO Global Generics Medicines 2014-2017)
- Dan Driscoll (Vice President, Sales and Marketing Institutional 2014-2015)
- John Fallon (Vice President, Institutional Markets 2014-2018)
- Allan Oberman (President and CEO, Teva Pharmaceuticals 2012-2015)
- Bill Marth (President and CEO, 2010-2013)
- Bob Cunard (Vice President Sales 2009-2011)
- Jonathan Kafer (Vice President Sales & Marketing 2007-2013)
- Tim Crew (Senior Vice President, COO, North America Generics 2007-2012)
- Dave Rekenhaller (Vice President Sales 2006-2015)

Compensation for Teva generics sales groups includes two components: overall company performance and individual performance. Individual performance was neither product-based nor based specifically on the sale of opioids.

The following persons were responsible for setting sales force compensation for generic opioids and the components of that compensation for the Teva-Acquired Actavis Entities:

- Alan Slavsky [Vice President of Sales – Watson] (2000 – 2012)

- Andy Boyer [Senior Vice President of Sales and Marketing – Watson/Actavis] (2007 – 2016)
- Michael Perfetto (Vice President of Sales and Marketing – Actavis] (2003 – 2013)

Approximately 80% of the compensation for the generics sales force for the Teva-Acquired Actavis Entities was based on the entities' overall performance, and approximately 20% was based on each individual's performance. Individual performance was neither product-based nor based specifically on sale of generic opioids.

The InVentiv sales force at Actavis also received compensation for informing doctors about the availability of generic oxymorphone in 2011. In the four regions with the top oxymorphone sales, the top five sales representatives within the region received a bonus, in the amounts of \$1,250, \$850, \$700, \$600, or \$500. The top InVentiv sales representative in the nation received a bonus of \$1,500, and the second sales representative in the nation received a bonus of \$1,000. The top Regional Business Director in the nation received a bonus of \$2,000.

**TOPIC NO. 12:**

The identity of any Person or entity, including any third party, vendor or any Defendant in this Action, who provided You with, or Your [sic] provided with, sales, distribution or prescribing data about Opioids or Opioid Products, the Person(s) who was the point of contact for each entity and the type of data provided by each.

**RESPONSE TO TOPIC NO. 12:**

The Teva Defendants have identified the following entities:

Vendors – Teva purchased data described in Topic No. 12 from the following vendors:

- IQVIA (f/k/a IMS)
  - Type of data: Prescriber-level script data; non-retail data to supplement retail business (e.g., military bases); sales data regarding the opioid market
  - Point of contact: Sales Operations Department and Market Research

- Symphony (f/k/a Wolters Kluwer)
  - Type of data: Prescriber-level script data
  - Point of contact: Sales Operations Department

Distributors – Teva purchased data described in Topic No. 12 from the following distributors:

- McKesson
  - Type of data: List of pharmacies who stocked Teva’s opioid products
  - Point of contact: Sales Operations Department
- AmerisourceBergen
  - Type of data: List of pharmacies who stocked Teva’s opioid products
  - Point of contact: Sales Operations Department

Analytics Companies – Teva provided data described in Topic No. 12 to the follow analytics companies:

- ZS Associates
  - Type of data: Prescriber-level script data
  - Point of contact: Sales Operations Department
- Clarion Healthcare
  - Type of data: Prescriber-level script data
  - Point of contact: Sales Operations Department

The Teva Defendants have identified the following entities with respect to the Teva-Acquired Actavis Entities:

- IMS
  - Type of data: Retail data, including hospital data and medical and prescription claims data

- Point of contact: Based on a reasonable investigation to date, the Teva Defendants are unable to identify a point of contact for IMS.
- Wolters Kluwer
  - Type of data: Prescription level data, including Projected LaunchTrac, monthly source prescriber services, and dynamic claims reports.
  - Point of contact: Carol Livingston (Vice President, Customer Operations) and Michelle Woker (Senior Vice President, Operations & Data Strategy)

**TOPIC NO. 13:**

The identity of all Persons who were responsible for representing You or who participated in, or were responsible for coordinating, managing or directing Your participation in, the Healthcare Distribution Alliance (“HDA”) and its predecessor organizations, the Healthcare Management Alliance (“HDMA”) and the National Wholesale Druggists Association (“NWDA”). This includes the identity of Persons who attended HAD [sic], HDMA or NWDA meetings on Your behalf.

**RESPONSE TO TOPIC NO. 13:**

The following employees coordinated Teva’s participation in HDA or HDMA:

- Chris Doerr – Teva Pharmaceuticals Vice President, Trade Relations & Distribution Strategy
- Teri Coward – Teva Pharmaceuticals Senior Director, Sales and Trade Relations
- Robin DeChristopher Barrale – Teva Pharmaceuticals Manager REMS Operations (formerly with Cephalon)
- Michelle Osmian – Teva Pharmaceuticals Senior Director, Customer Operations.

The following Teva employees participated in HDA or HDMA events or initiatives, including (1) the Business and Leadership Conference, (2) the Distribution Management Conference, (3) the Research Foundation Fundraising Dinner, (4) the Annual Board and

Membership Meeting, (5) the HDA Research Foundation Board, (6) the eCommerce Task Force, (7) the Drug Shortage Task Force, and/or (8) the Supply Chain Task Force.

- Chris Doerr
- Teri Coward
- Robin DeChristopher Barrale
- Michelle Osmian
- Representatives from Trade Relations
- Representatives from Customer Operations
- Jeff Herzfeld – Former Teva Pharmaceuticals Vice President, Trade Relations & Distribution Strategy
- Randy Bradway – Former Teva Pharmaceuticals VP, Site Supply Chain Planning (formerly with Cephalon)
- Brian McCrudden – Former Teva Pharmaceuticals Senior Director, Alliance Management (formerly with Cephalon)
- Kevin Friel – Formerly with Cephalon

Any interested person can join the HDA or HDMA. Accordingly, it is possible that various employees of the Teva-Acquired Actavis Entities may have coordinated and/or participated in the HDA or HDMA events or initiatives. The Teva Defendants are aware that the following Teva-Acquired Actavis Entities employees coordinated and/or participated in HDA or HDMA events or initiatives:

- Alan Slavsky
- David Myers – Teva Pharmaceuticals Senior Manager, Product Marketing (formerly with the Actavis)

- Napoleon Clark

**TOPIC NO. 15:**

Identification of any databases, lists or Documents containing information about members of the FDA or U.S. Congress who have been lobbied by or were the subject of any Lobbying efforts and/or governmental affairs activities undertaken by You and the type of information found in the database(s), the network and/or computer system(s) which holds the database(s), the software used to create and maintain the database(s) and the identity of the Persons responsible for maintaining the records or database(s).

**RESPONSE TO TOPIC NO. 15:**

The Teva Defendants are not aware of any internal database or list containing information about members of the FDA or U.S. Congress who have been lobbied by the Teva Defendants related to opioids, or any document aggregating such information.

**TOPIC NO. 16:**

All donations or payments Concerning Opioids or Opioid Products to: (a) Lobbyists; (b) Persons or entities named in the Complaint; or (c) Persons who disseminated information about prescription Opioids to prescribers or the public on Your behalf and the identity of all Persons responsible for such donations or payments.

**RESPONSE TO TOPIC NO. 16:**

The Teva Defendants refer Plaintiffs to their response to Topic No. 11. In addition, data reflecting payments to healthcare professionals from 2009 to 2017 can be found at TEVA\_MDL\_A\_03413816. Data reflecting payments to third-party entities referenced in the Complaint from 2011 to 2018 can be found at TEVA\_MDL\_A\_02401119.

The Teva Defendants' federal lobbying activities and payments to lobbyists are publicly disclosed and can be found at <https://lobbyingdisclosure.house.gov/>. Certain of these activities may have been related to policies or legislation concerning opioids. Many states maintain similar websites with public information about lobbying activities and payments. To the extent that such information is not publicly available, the Teva Defendants are conducting a reasonable investigation and will supplement this response as necessary.

The Teva-Acquired Actavis Entities engaged the InVentiv contract sales force, described in the response to Topic No. 11 above, to inform doctors about the availability of generic oxymorphone in 2011. The Teva Defendants are not aware of any other donations or payments that the Teva-Acquired Actavis Entities made to lobbyists, persons or entities named in the complaint, or persons who disseminated information about prescription opioids to prescribers or the public.

**TOPIC NO. 17:**

The surveys, focus groups, market research or other similar research or investigation that You performed, had performed on Your behalf, or that you received or reviewed, regarding physician or public perceptions of the safety, efficacy and/or addictive nature of Your Opioid Products, other Opioid products, or Opioids and Your use of focus groups, research or investigations in developing a sales and marketing strategy and/or a strategy on how to effect, change or influence those perceptions.

**RESPONSE TO TOPIC NO. 17:**

On behalf of Cephalon and subsequently Teva, ZS Associates conducted message recall studies, compliance-related message recall studies, and Attitude Trial and Usage (“ATU”) studies. Cephalon also conducted focus groups with pharmacists related to Risk Evaluation and Mitigation Strategy.

The Teva-Acquired Actavis Entities did not engage in surveys, focus groups, market research or other similar research or investigation regarding physician or public perceptions of the safety, efficacy and/or addictive nature of generic opioids.

**TOPIC NO. 22:**

All reports that were given to the Board of Directors regarding Opioids or Your Opioid Products including but not limited to reports regarding:

- a. Sales;
- b. Lobbying efforts related to Opioids or Opioid Products;
- c. Safety and efficacy of Your Opioid Products;
- d. Submissions to the FDA or DEA;

- e. Documents, studies, reports, data or other information that You did not submit to FDA or DEA;
- f. Abuse potential for Your Opioid Products;
- g. Reports of abuse, misuse, diversion, addiction or dependence regarding opioids or Your Opioid products;
- h. Government investigations regarding Opioids or Your Opioid Products;
- i. Sales and marketing of Your Opioid Products.

**RESPONSE TO TOPIC NO. 22:**

Between 2008 and 2011, a representative from the Compliance Department presented at the regular meetings of the Board of Directors of Cephalon. These presentations related to updates regarding the implementation of the Corporate Integrity Agreement that Cephalon entered into with FDA Office of Inspector General on September 29, 2008. Following the acquisition of Cephalon in 2011, a representative from the Compliance Department continued to make regular presentations at the quarterly meetings of the joint boards of Teva Pharmaceuticals and Cephalon through 2013.

Between 2003 and 2011, the Cephalon Board of Directors received updates related to sales and marketing practices of ACTIQ® and FENTORA®. These reports can be found at:

- TEVA\_MDL\_A\_00360232 – TEVA\_MDL\_A\_00360737
- TEVA\_MDL\_A\_00667543 – TEVA\_MDL\_A\_00677008
- TEVA\_MDL\_A\_04081461 – TEVA\_MDL\_A\_04081646
- TEVA\_MDL\_A\_06647879 – TEVA\_MDL\_A\_06663519

To date, the Teva Defendants have not identified any reports given to the Board of Directors for the Teva-Acquired Actavis Entities regarding generic opioids.

**TOPIC NO. 31:**

Your Marketing budget, by year, for Your Opioid Products from 2000 to the present and the categories of expenditures contained in that budget.



**RESPONSE TO TOPIC NO. 31:**

- The Actiq tactical budget for 2004 can be found at TEVA\_MDL\_A\_03244006.
- The Actiq tactical budget by category for 2005 can be found at TEVA\_MDL\_A\_03243914.
- The Fentora promotional budget by category for 2007 can be found at TEVA\_MDL\_A\_06666094.
- Fentora marketing budget by category for 2008 can be found at TEVA\_MDL\_A\_07253669.
- The Fentora marketing budget by category for 2009 can be found at TEVA\_MDL\_A\_00371710.
- The Fentora marketing budget by category for 2010 can be found at TEVA\_MDL\_A\_00708821.
- The Fentora marketing budget by category for 2012 can be found at TEVA\_MDL\_A\_01184564.
- The Fentora marketing budget by category for 2013 can be found at TEVA\_MDL\_A\_0296477.
- Actiq marketing budgets for 2014-2016 can be found at TEVA\_MDL\_A\_00455085.
- Fentora marketing budgets for 2014-2016 can be found at TEVA\_MDL\_A\_00455085.

Teva and the Teva-Acquired Actavis Entities did not have a marketing budget specific to generic opioid products.

**TOPIC NO. 32:**

Your annual sales, revenue and profits of each Opioid Product from 2000 to present.

**RESPONSE TO TOPIC NO. 32:**

The following documents contain the requested information relating to branded opioid products:

- Actiq sales data from 2001 to Q1 2012 can be found at TEVA\_MDL\_A\_06447382.
- Fentora sales data from 2006 to Q1 2012 can be found at TEVA\_MDL\_A\_02419958.
- Actiq and Fentora sales data from Q2 2012 to Q1 2018 can be found at TEVA\_MDL\_A\_02401117.

The following documents contain the requested information relating to generic opioid products:

- Account receivable transaction level data from Q2 2017 through June 2018 for Teva and Teva-Acquired Actavis Entities generics can be found at TEVA\_MDL\_A\_02419965.
- Net sales data from 2016 – 2017 for Teva and Teva-Acquired Actavis Entities generics can be found at TEVA\_MDL\_A\_02416208 and TEVA\_MDL\_02419959.
- Net sales data from 2012 – 2017 for Teva generics products can be found at TEVA\_MDL\_A\_02416208 and TEVA\_MDL\_02419959.
- Accounts receivable transaction level data from 2008 – 2016 for Teva generics can be found at TEVA\_MDL\_A\_02419966, TEVA\_MDL\_A\_02419967, TEVA\_MDL\_A\_02419968, and TEVA\_MDL\_A\_02419964.

- Net sales data from 2014 – 2015 for Teva-Acquired Actavis Entities generics products can be found at TEVA\_MDL\_A\_02416208 and TEVA\_MDL\_02419959.
- Accounts receivable transaction level data from 2013 – 2017 (Q1) for Teva-Acquired Actavis Entities generics can be found at TEVA\_MDL\_A\_02419969, TEVA\_MDL\_A\_02419963 and TEVA\_MDL\_A\_02419960.
- Additional summary sales data by unit (not dollar value) from 2011 to 2017 for Teva-Acquired Actavis Entities generics can be found at TEVA\_MDL\_A\_02419962.

Indirect sales data from 2001 – Q2 2014 for Teva-Acquired Actavis Entities generics and indirect sales data from 2004 to Q2 2014 for Watson generics can be found at:<sup>1</sup>

- TEVA\_MDL\_A\_07869902 - TEVA\_MDL\_A\_07876853
- TEVA\_MDL\_A\_07876854 - TEVA\_MDL\_A\_07880642
- TEVA\_MDL\_A\_07880643 - TEVA\_MDL\_A\_07885149
- TEVA\_MDL\_A\_07885150 - TEVA\_MDL\_A\_07889184
- TEVA\_MDL\_A\_07889185 - TEVA\_MDL\_A\_07889288
- TEVA\_MDL\_A\_07889289 - TEVA\_MDL\_A\_07901019
- TEVA\_MDL\_A\_07901020 - TEVA\_MDL\_A\_07907288
- TEVA\_MDL\_A\_07907289 - TEVA\_MDL\_A\_07914957
- TEVA\_MDL\_A\_07914958 - TEVA\_MDL\_A\_07921676

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<sup>1</sup> The Teva Defendants cannot verify the accuracy or completeness of the “indirect raw sales data” because of the form of the data as transferred. As a result of multiple acquisitions over time, the generics business that Teva acquired was an aggregation of a number of companies that all had different systems and processes to record, track and report their financial information, inclusive of product sales information. Additionally, within these companies there were system changes that occurred. Although Teva acquired certain legal entities and systems as a result of its acquisition of the generics business, this business did not have stand-alone records. Therefore, Teva has no means by which to verify the completeness nor accuracy of this information.

- TEVA\_MDL\_A\_07921677 - TEVA\_MDL\_A\_07921925
- TEVA\_MDL\_A\_07921926 - TEVA\_MDL\_A\_07921926
- TEVA\_MDL\_A\_07921927 - TEVA\_MDL\_A\_07921927
- TEVA\_MDL\_A\_07921928 - TEVA\_MDL\_A\_07928168
- TEVA\_MDL\_A\_07928169 - TEVA\_MDL\_A\_07937356

Indirect sales data from Q2 2014 to Q1 2017 for Teva-Acquired Actavis Entities generics and direct sales data from Teva-Acquired Actavis Entities QAD is currently in production. The Teva Defendants will supplement its response with the corresponding Bates numbers once those documents are produced.

**TOPIC NO. 42:**

Whether the Marketing and educational materials produced by You in this matter or identified pursuant to this notice of deposition, or materials containing similar messages, were distributed into the State of Ohio and Track 1 jurisdictions.

**RESPONSE TO TOPIC NO. 42:**

The Teva Defendants did not track on a state-specific basis the distribution of marketing and educational materials.

**TOPIC NO. 46:**

Identification of all financial and accounting information you maintain in the ordinary course of Your business regarding Your marketing, promotional and advertising expenditures, and all financial and accounting regarding the effectiveness of Your marketing, promotion and advertising expenditures.

**RESPONSE TO TOPIC NO. 46:**

The following documents contain the information sought by this topic:

- Budgets and actuals for units sold, and sales and marketing expenses related to FENTORA® for 2013 to 2016 can be found at TEVA\_MDL\_A\_00455085.

- Profit & Loss spreadsheet for ACTIQ®, generic ACTIQ®, and FENTORA® for 2006 to 2012 can be found at TEVA\_MDL\_A\_02419958.
- Payments to certain third-party vendors for 2003 – 2018 can be found at TEVA\_MDL\_A\_02401119.

To the extent individual employees of the Teva-Acquired Actavis Entities may have created documents with information similar to that sought by this topic, the Teva Defendants are continuing to collect and produce such documents to the extent that they have been identified in the course of the Teva Defendants' discovery efforts.

**TOPIC NO. 49:**

The nature and scope of any meetings, correspondence, communications, documents, contracts or agreements, between You and Purdue, Endo, Mallinckrodt, Actavis, McKesson, Cardinal, and AmerisourceBergen (together with You, the "RICO Supply Chain Defendants") concerning diversion of Opioids or Opioid Products, including:

(a) The duties to maintain effective controls against diversion of Opioids or Opioid Products, design and operate a system to identify and report suspicious orders of Opioids or Opioid Products to the local Field Division Office of the DEA, and to perform due diligence and/or halt suspicious orders of Opioids or Opioid Products;

(b) Orders of unusual size, deviating substantially from a normal pattern, and orders of unusual frequency, including any discussion or investigation by You or any RICO Supply Chain Defendant, or any state or federal governmental agency, of any prescriber, pill mill, facility, hospital or medical officer for improper prescribing practices, suspicious orders, or diversion;

(c) Quotas governing the manufacturer, production, distribution, or sale of Opioids or Opioids Products set by the DEA, including but not limited to Aggregate Production Quotas, Individual Manufacturing Quotas, and Procurement Quotas; and any applications for the same or requests to modify the same;

(d) The "Know Your Customer" due diligence requirements, including due diligence performed regarding new customer orders or applications; and ongoing due diligence performed regarding existing customers;

(e) Any letters, advice, presentations, conferences, or guidance provided by the DEA or any representative or agent thereof, regarding the duty of registrants under the CSA to prevent diversion, to identify and report suspicious orders, and to perform due diligence and/or halt orders identified as suspicious, including the duty to "Know Your Customer;"

(f) Chargebacks, rebates, or other reimbursement programs between you and any Distributor Defendant named in the Complaint concerning the exchange of transaction information

or “chargeback data” from any Distributor Defendant, as well as rebate or discount programs given in exchange for increases in the volume of Opioid or Opioid Products sold by that entity;

(g) Any vault security program whereby You agreed to or did provide the necessary vault security for a Distributor Defendant;

(h) Advocacy or legal support for any Defendant, including but not limited to amicus curiae briefs, or other legal documents prepared by You in support of any Defendant; and

(i) Public statements or testimony provided by You or any Defendant to Congress concerning the manufacture, development, formulation, marketing, advertising, sale, distribution, diversion or suspicious orders of Opioids or Opioid Products.

**RESPONSE TO TOPIC NO. 49:**

By agreement of the parties and as described in J. Maier’s email to M. Crawford on October 24, 2018, the Teva Defendants’ respond only with respect to the “contracts and agreements” referenced in Topic No. 49. Pursuant to that agreement, the Teva Defendants respond to each subpart as follows:

Subparts (a), (b), and (d): The Teva Defendants and any party that enters into a contract or agreement with the Teva Defendants are required to comply with applicable federal, state, and local laws and regulations, including, but not limited to those laws, requirements, and regulations governing the manufacture, purchase, handling, sale, marketing and distribution of all products. Below are examples of relevant agreements and/or contracts between and among the Teva Defendants, Purdue, Endo, Mallinckrodt, Actavis, McKesson, Cardinal, and AmerisourceBergen that are responsive to Topic 49, subtopics (a), (b), and (d).

- TEVA\_MDL\_A\_03434545
- TEVA\_MDL\_A\_04343493
- TEVA\_MDL\_A\_06770231
- TEVA\_MDL\_A\_03442281
- TEVA\_MDL\_A\_03442434
- TEVA\_MDL\_A\_03442461

- TEVA\_MDL\_A\_03442480
- TEVA\_MDL\_A\_03443684
- TEVA\_MDL\_A\_03461404
- TEVA\_MDL\_A\_03448764
- TEVA\_MDL\_A\_03458284
- TEVA\_MDL\_A\_06748813
- Acquired\_Actavis\_00488611
- Acquired\_Actavis\_00886518

Subparts (c), (e), (h), and (i): The Teva Defendants are not aware of relevant agreements and/or contracts between and among the Teva Defendants, Purdue, Endo, Mallinckrodt, Actavis, McKesson, Cardinal, and AmerisourceBergen that are responsive to Topic 49, subtopic (c), (e), (h), and (i).

Subpart (f): Below are examples of relevant agreements and/or contracts between and among the Teva Defendants, Purdue, Endo, Mallinckrodt, Actavis, McKesson, Cardinal, and AmerisourceBergen that are responsive to Topic 49, subtopic (f).

- TEVA\_MDL\_A\_03452696
- TEVA\_MDL\_A\_02836955
- TEVA\_MDL\_A\_02837042
- TEVA\_MDL\_A\_03442221
- TEVA\_MDL\_A\_03442281
- TEVA\_MDL\_A\_03442434
- TEVA\_MDL\_A\_03442461
- TEVA\_MDL\_A\_03442480

- TEVA\_MDL\_A\_03443655
- TEVA\_MDL\_A\_03443684
- TEVA\_MDL\_A\_03445275
- TEVA\_MDL\_A\_03445326
- TEVA\_MDL\_A\_03448764
- TEVA\_MDL\_A\_03458284
- TEVA\_MDL\_A\_03449893
- Acquired\_Actavis\_00237322
- Acquired\_Actavis\_00237673
- Acquired\_Actavis\_00238776
- Acquired\_Actavis\_00575220

Subpart (g): The Teva Defendants and any party that enters into a contract or agreement with the Teva Defendants are required to comply with applicable federal, state, and local laws and regulations, including, but not limited to those laws, requirements, and regulations governing the manufacture, purchase, handling, sale, marketing and distribution of all products. An example of a relevant agreement and/or contract between and among the Teva Defendants, Purdue, Endo, Mallinckrodt, Actavis, McKesson, Cardinal, and AmerisourceBergen that are responsive to Topic 49, subtopic (g) can be found at TEVA\_MDL\_A\_06748813.

Dated: November 14, 2018

Respectfully submitted,

/s/ Steven A. Reed  
 Steven A. Reed  
 Rebecca Hillyer  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 14th day of November 2018, the foregoing has been served via email only to the following liaison counsel:

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