

**BEFORE THE DIVISION OF CONSUMER PROTECTION
OF THE DEPARTMENT OF COMMERCE
OF THE STATE OF UTAH**

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

**DECLARATION OF CRAIG LANDAU IN SUPPORT OF PURDUE'S
OPPOSITION TO THE DIVISION'S REQUEST FOR
APPROVAL TO DEPOSE PARTIES AND NON-PARTIES**

I, CRAIG LANDAU, M.D., declare under criminal penalty as follows:

1. I am the President and Chief Executive Officer ("CEO") of Purdue Pharma L.P. ("Purdue"), a Respondent in the above-captioned action. I have been the President and CEO of Purdue since June 2017.

2. I understand that on July 18, 2019, the Division of Consumer Protection of the Department of Commerce of the State of Utah (the "Division") filed a request for approval to depose certain individuals, including me. I submit this Declaration in support of Purdue's opposition to the Division's request and motion for a protective order preventing the requested deposition. I make this Declaration based on my own personal knowledge to the best of my recollection.

3. To the best of my recollection, I have never had any contacts with Utah, in either a professional or personal capacity.

4. I am a resident of the state of Connecticut. I also own homes in Florida and in Canada. I have never resided in Utah. I have never regularly conducted or solicited business in Utah, nor otherwise engaged in a consistent course of conduct in Utah, either as President and CEO of Purdue or otherwise.

5. My office is located at Purdue's headquarters in Stamford, Connecticut.

6. From October 1999 to September 2013, I served in various positions at Purdue, and those positions were all based in Purdue's Stamford, Connecticut headquarters. I was not in Purdue's sales or marketing departments, and my responsibilities did not include the sales, marketing, or promotion of Purdue's opioid medications in Utah, or any other state. In my prior positions at Purdue, I conducted the vast majority of my Purdue-related activities from Purdue's headquarters in Connecticut.

7. From September 2013 to June 2017, I served as the President and CEO of Purdue Pharma Canada, and my office was in Canada. I understand that no activity by Purdue Pharma Canada is at issue in this action.

8. In June 2017, I was appointed President and CEO of Purdue. For a brief period thereafter, I also retained responsibility for Purdue Pharma Canada.

9. In the fewer than eight months that I served as President and CEO of Purdue prior to February 2018, when Purdue ceased deploying sales personnel to promote its opioid medications to prescribers, I was not involved in the day-to-day sales, marketing, or promotion of Purdue's opioid medications in Utah, or any other state. Nor was I involved in the management or direct oversight of Purdue sales representatives in Utah, or any other state.

During that period, there were at least four levels of management between me and Purdue's sales representatives in Utah, as in every other state.

10. I have not personally directed or engaged in the marketing or promotion of Purdue's opioid medications in Utah. I have never directed any other Purdue employee to visit particular doctors in Utah, to make payments to any particular doctors in Utah, or to engage in any particular promotional activities in Utah.

11. I understand that my name is not mentioned in the Administrative Citation ("Citation") in this action, and I do not believe that I have any unique or superior personal knowledge relating to any of the allegations in the Citation. I believe that any information sought from me by the Division can be obtained from documents or other witnesses.

12. Moreover, preparing for and sitting for a deposition in this matter would constitute a severe burden to both me and Purdue in light of my unique, critical obligations to the company during this especially challenging time. As President and CEO, I am the executive leader of Purdue, with ultimate oversight of operations comprising more than 690 employees. My responsibilities include the panoply of duties traditionally held by CEOs of complex pharmaceutical organizations, such as managing and motivating personnel, communicating with my management teams across the businesses of the company, developing and implementing short-term and long-term strategies, overseeing an active pipeline of new medicines, supporting the financial and corporate compliance functions, and driving new business development. In addition, I am responsible for managing the extraordinary – indeed, unprecedented – issues arising from the thousands of lawsuits filed across the country against Purdue, and I must work closely with counsel and other advisors on an almost daily basis. I am required to be available 24 hours a day, seven days a week, and my typical workday ranges from 12 to 16 hours. Under

the present circumstances, my duties at Purdue require my full attention, and preparing for and sitting for a deposition in this matter would be extremely, and unnecessarily, disruptive.

* * *

I declare under criminal penalty under the law of Utah that the foregoing is true and correct.

Signed on the 25th day of July, 2019, at Stamford, Connecticut.

Craig Landau
Printed Name



Signature