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*Attorneys for Respondents Richard
Sackler, M.D., and Kathe Sackler, M.D.*

**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.

**DECLARATION OF RICHARD
SACKLER**

DCP Legal File No. CP-2019-005

DCP Case No. 107102

Richard Sackler hereby declares and states:

1. I am a respondent in an administrative proceeding before the Division of Consumer Protection of the Department of Commerce of the State of Utah, DCP Legal File No. CP-2019-005, DCP Case No. 107102, titled *In the Matter of Purdue Pharma L.P., et al.*, which asserts claims against me based on events allegedly occurring after January 1, 1996 (the “**Period**”). I submit this declaration in support of my motion to dismiss the Notice of Agency

Action and attached Administrative Citation filed in the above-captioned matter based on lack of personal jurisdiction.

2. I maintained my primary residence in Connecticut until 2013, when I moved to Texas. In 2018, I moved from Texas to Florida, where I am now domiciled. I have never been domiciled in Utah or maintained an office in Utah, though I do use a vacation home in Alta, Utah.


3. I served on the Board of Directors of (i) Purdue Pharma Inc. (“PPI”) throughout the Period until July 24, 2018; and (ii) The Purdue Frederick Company (“PFC”) throughout the Period until March 7, 2005. During the Period, I have not served as a director of Purdue Pharma L.P. (“PPLP”), which has no directors. I served as Co-Chairman of PPI and PPLP—positions with no executive authority—from March 4, 2003, until May 11, 2007. Other than holding the title of President of PPLP and PPI from December 1, 1999, until March 4, 2003, and Senior Vice President of PFC throughout the Period until March 7, 2005, I was not an employee or officer of PPLP, PPI or PFC during the Period.

Pursuant to Utah Code Ann. § 78B-18a-101, *et seq.*, I declare under criminal penalty under the law of Utah that the foregoing is true and correct.

Signed on the 5th day of April, 2019, at Greenwich, CT.

Richard Sackler

Richard Sackler
Printed Name


Signature