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Attorneys for Respondent Kathe Sackler

# BEFORE THE DIVISION OF CONSUMER PROTECTION OF THE UTAH DEPARTMENT OF COMMERCE

### IN THE MATTER OF:

PURDUE PHARMA L.P., a Delaware limited partnership; PURDUE PHARMA INC., a New York Corporation; THE PURDUE FREDERICK COMPANY INC., 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.

MOTION AND CONSENT OF SPONSORING COUNSEL FOR PRO HAC VICE ADMISSION OF SUSAN REAGAN GITTES

DCP Legal File No. CP-2019-005

DCP Case No. 107102

Pursuant to Rule 14-806 of the Utah Code of Judicial Administration, Paul T. Moxley of Cohne Kinghorn, moves the court for an order admitting Susan Reagan Gittes, of Debevoise & Plimpton, pro hac vice to act as counsel in the above-captioned matter on the following basis:

Kathe Sackler has retained the services of Susan Reagan Gittes, who is neither licensed to practice law in the State of Utah nor a resident of Utah. Susan Reagan Gittes is not regularly employed in Utah, and she resides in and is admitted to practice in the State of New York where she is an attorney in good standing as evidenced by copies of the Certificate of Good Standing, Application and original Acknowledgement of Supporting Documentation and Receipt of Pro Hac Vice Filing Fee attached hereto as Exhibit A.

As required by Rule 14-806, both a filing fee and Susan Reagan Gittes's original Application have been submitted to the Utah State Bar. Paul T. Moxley and the firm of Cohne Kinghorn hereby agree to serve as designated local counsel for the subject case. Mr. Moxley agrees to comply with all applicable provisions of the Utah Rules of Civil Procedure and the Utah Code of Judicial Administration, and to readily communicate with opposing counsel and the court regarding the conduct of this case. He also agrees to accept papers when served and recognizes the responsibility to act for and on behalf of the clients in all case-related proceedings, including hearings, pretrial conferences, and trials, should Susan Reagan Gittes fail to respond to any court order.

A proposed order admitting Susan Reagan Gittes accompanies this motion.

Dated this 5th day of August, 2019.

COHNE KINGHORN, P.C.

/s/ Paul T. Moxley

Paul T. Moxley Hal L. Reiser

Patrick E. Johnson

Timothy J. Bywater

Attorneys for Respondent Kathe Sackler

# **CERTIFICATE OF SERVICE**

I hereby certify that on this the 5th day of August, 2019, I served the above-captioned document on the parties of record in this proceeding set forth below by delivering a copy thereof by electronic means and U.S. Mail and/or as more specifically designated below, to:

# By first class mail, postage prepaid:

Utah Department of Commerce Bruce Dibb, Administrative Law Judge 160 East 300 South, 2ndFloor PO Box 146701 Salt Lake City, UT 84114-6701 Utah Division of Consumer Protection 160 East 300 South, 2ndFloor PO Box 146704 Salt Lake City, UT 84114-6704

### By electronic mail:

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Jacob Stahl jwstahl@debevoise.com

/s/ Patrick E. Johnson

# EXHIBIT A

# Appellate Division of the Supreme Court of the State of New York First Judicial Department

I, Susanna Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, certify that

# SUSAN REAGAN GITTES

was duly licensed and admitted to practice as an Attorney and Counsellor at Law in all the courts of the State of New York on October 17, 2011, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counsellors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counsellor at law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of this court on

April 16, 2019

4794

Clerk of the Court

DEPARTMENT OF COMMERCE Heber M. Wells Building, 2<sup>ND</sup> Floor 160 EAST 300 SOUTH SALT LAKE CITY, UT 84114

# BEFORE THE DIVISION OF CONSUMER PROTECTION OF THE UTAH 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 INC., 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.

ORDER GRANTING ADMISSION PRO HAC VICE

Case No. CP-2019-005

DCP Case No. 107102

Based upon the Motion for Admission Pro Hac Vice of Susan Reagan Gittes and the consent to appear as associate counsel by Paul T. Moxley, it is hereby ordered that Susan Reagan Gittes be admitted *pro hac vice* as counsel for Kathe Sackler in the above entitled matter.

Dated this \_\_\_\_ day of August, 2019.

UTAH DEPARTMENT OF COMMERCE

Bruce L. Dibb, Presiding Officer

# **CERTIFICATE OF SERVICE**

I hereby certify that on the \_\_\_\_ day of August, 2019, I served the foregoing on the parties of record in this proceeding by delivering a copy by electronic means to:

Chris Parker
Acting Director/Presiding Officer
Division of Consumer Protection
chrisparker@utah.gov

Purdue Pharma, L.P.
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The Purdue Frederick Company,
(the "Purdue Respondents"),
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