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Attorneys for the Utah Division of Consumer Protection

**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**, 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.

**REQUEST FOR RE-ISSUANCE
OF FRIEDMAN AND STEWART
SUBPOENAS**

DCP Legal File No. CP-2019-005

DCP Case No. 107102

The Utah Division of Consumer Protection (“Division”), by and through undersigned counsel, and pursuant to Utah Admin. Code R151-4-502, R151-4-505 and R151-4-514, respectfully requests that the Administrative Law Judge execute amended subpoenas for Mr. Friedman and Mr. Stewart. (Mr. Timney has already been properly served, but advised the Division that he intends to move to quash the subpoena.) Given that the Administrative Law Judge has already addressed the substance of the Division’s right to depose these witnesses in its written decision issued on August 12, 2019, and another written decision issued yesterday, September 3, 2019, this is a purely ministerial request that need not await any response from Respondents. The Division respectfully requests that the Administrative Law Judge execute the appended subpoenas.

DATED this 4th day of September, 2019.

SEAN D. REYES
UTAH ATTORNEY GENERAL

By: /s/ Kevin M. McLean
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Counsel for the Division

CERTIFICATE OF SERVICE

I certify that on September 4, 2019, I served the foregoing on the parties of record in this proceeding as set forth below:

By electronic mail:

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Dated this 4th day of September, 2019.

/s/ Susan L. Burke
Susan L. Burke

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Respondents.

DCP Legal File No. CP-2019-005

DCP Case No. 107102

**SUBPOENA FOR TAKING
DEPOSITION**

TO: John Stewart
123 Algonquin Drive
Lake Placid, NY 12946

X YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case, said method of recording the testimony to be by stenographic and videographic means.

| | |
|--|--|
| PLACE OF DEPOSITION: LOCATION TO BE AGREED UPON | DATE AND TIME: 9AM, SEPT. 17, 2019 |
| | METHOD OF RECORDING: STENOGRAPHIC AND VIDEO |

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or tangible things at the place, date, and time specified below (list documents or objects):

| | |
|--------|----------------|
| PLACE: | DATE AND TIME: |
|--------|----------------|

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below:

| | |
|-----------|----------------|
| PREMISES: | DATE AND TIME: |
|-----------|----------------|

AUTHORITY

The Division of Consumer Protection (“DCP”) issues this subpoena pursuant to Utah Code § 13-2-6(5) and Utah Code § 13-11-16(1). DCP has reason the Deponent has information regarding or relating to Respondents’ conduct that is alleged to have violated the Utah Consumer Sales Practices Act. Utah Code § 13-11-1, *et seq.*

ENFORCEMENT

Except as otherwise agreed by stipulation or ordered, you shall comply with this subpoena and shall appear to testify on the date set forth herein. Failure to comply with this subpoena may result in a contempt or civil enforcement action. Utah Code §§ 63G-4-501, 78B-6-313.

By: _____
Judge Dibb, Presiding Officer
Date: September __, 2019

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Respondents.

DCP Legal File No. CP-2019-005

DCP Case No. 107102

**SUBPOENA FOR TAKING
DEPOSITION**

TO: Michael Friedman
85 Clubhouse Drive
Stamford, CT 06902

X YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case, said method of recording the testimony to be by stenographic and videographic means.

| | |
|--|--|
| PLACE OF DEPOSITION: LOCATION TO BE AGREED UPON | DATE AND TIME: 9AM, SEPTEMBER 16, 2019 |
| | METHOD OF RECORDING: STENOGRAPHIC AND VIDEO |

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or tangible things at the place, date, and time specified below (list documents or objects):

| | |
|--------|----------------|
| PLACE: | DATE AND TIME: |
|--------|----------------|

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below:

| | |
|-----------|----------------|
| PREMISES: | DATE AND TIME: |
|-----------|----------------|

AUTHORITY

The Division of Consumer Protection (“DCP”) issues this subpoena pursuant to Utah Code § 13-2-6(5) and Utah Code § 13-11-16(1). DCP has reason the Deponent has information regarding or relating to Respondents’ conduct that is alleged to have violated the Utah Consumer Sales Practices Act. Utah Code § 13-11-1, *et seq.*

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By: _____
Judge Dibb, Presiding Officer
Date: September __, 2019