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*Attorneys for the Utah Division of Consumer Protection*

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

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**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.**

**JOINT MOTION FOR ORDER  
GOVERNING DISCOVERY DISPUTES**

**DCP Legal File No. CP-2019-005**

**DCP Case No. 107102**

The parties, the Utah Division of Consumer Protection (the Division), Purdue Pharma L.P., Purdue Pharma Inc., and The Purdue Frederick Company (collectively, Purdue), Richard Sackler, and Kathe Sackler, jointly request that the Administrative Law Judge enter the Proposed Order Governing Discovery Disputes, attached hereto as Exhibit A.<sup>1</sup>

On April 23, 2019 the Administrative Law Judge held a prehearing conference in this matter. During the conference, counsel for the Division proposed a protocol for the submission of discovery disputes to the Administrative Law Judge for determination. The protocol would require discovery disputes to be submitted to the Administrative Law Judge by letter brief of no more than five (5) pages in length, with responses submitted within four (4) days. The Administrative Law Judge requested counsel for the Division to draft a proposed order and circulate it to Respondents for agreement.

The parties have agreed to the Proposed Order attached hereto as Exhibit A and respectfully request that the Administrative Law Judge enter the Order.

Respectfully submitted this 9<sup>th</sup> day of May, 2019.

By: /s/ Robert Wing  
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<sup>1</sup> In joining this motion, Respondents Richard Sackler and Kathe Sackler do not waive, and expressly preserve, all defenses, including defenses based on lack of personal jurisdiction.

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## CERTIFICATE OF SERVICE

I certify that on May 9, 2019 I served the foregoing on the parties of record in this proceeding as set forth below:

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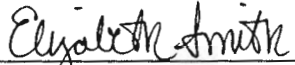
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Dated this 9<sup>th</sup> day of May, 2019.

  
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Elizabeth Smith