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*Attorneys for Respondents Purdue Pharma L.P., Purdue Pharma Inc.,  
and The Purdue Frederick Company*

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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 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.**

**PURDUE'S PRELIMINARY LIST OF  
INTERVIEWS/DEPOSITIONS**

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

**DCP Case No. 107102**

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Pursuant to the Scheduling Order and Notice of Hearing entered by Presiding Officer Bruce L. Dibb on April 23, 2019, Respondents Purdue Pharma L.P., Purdue Pharma Inc., and The Purdue Frederick Company Inc. (collectively, "Purdue") hereby submit this *Preliminary List of Interviews/Depositions*.

Purdue may seek to interview or depose the following individuals identified in the Division's initial disclosures:

- Angela Stander
- Dr. Lynn Webster
- Dr. Perry Fine
- Dr. Russel Portenoy
- Witnesses identified in the Division's initial disclosure who have not been named, including those identified by the Division as follows:
  - Employees, executives, directors, staff and agents of pain advocacy groups and medical societies, including but not limited to American Pain Foundation, U.S. Pain Foundation, American Pain Society, American Academy of Pain Medicine, JACHO, University of Wisconsin Pain & Policy Study Group, with knowledge of these groups' relationships and interactions with, and funding from, Purdue;
  - Employees, executives, staff, and agents of McKinsey, Porter Novelli, and other vendors who were involved in developing or analyzing Purdue's marketing materials or activities;
  - Utah Division of Occupational and Professional Licensing employees, or employees of other state agencies, with responsibility for licensing or investigating doctors, pharmacies, and distributors;
  - Utah agency employees or other professionals or academics in Utah who have studied, written about, or are otherwise knowledgeable about the opioid crisis in Utah (to the extent relevant to civil penalties).
- One or more witnesses designated by the Division as representatives under Utah Rule of Civil Procedure 30(b)(6).
- Any other witnesses the Division identified in their Initial Disclosures or identified in future supplemental disclosures.

In light of the current state of discovery, this list represents Purdue's good faith effort to identify those fact witnesses it intends to interview or depose. As stated in the Scheduling Order, this list "shall not preclude other persons named in the initial disclosures from being interviewed or deposed at a later date."

Purdue will meet and confer with the Division regarding a schedule for interviews or depositions and to identify those witnesses not specifically named in the parties' initial disclosures.

DATED: May 21, 2019.

SNELL & WILMER L.L.P.

/s/ Elisabeth M. McOmber

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