

Paul T. Moxley
 Patrick E. Johnson
 COHNE KIGHORN
 111 E. Broadway Eleventh Floor
 Salt Lake City, UT 84111
 (801) 363-4300
pmoxley@cohnekinghorn.com
pjohnson@cohnekinghorn.com
 Attorneys for Respondents Richard
 Sackler and Kathe Sackler

**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 KATHE A. SACKLER

DCP Legal File No. CP-2019-005

DCP Case No. 107102

Kathe A. Sackler hereby declares and states:

- 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 currently reside in Connecticut, where I am domiciled. I have never resided in Utah, owned or rented property in Utah, or maintained an office in Utah. To the best of my recollection, knowledge, and belief, I have never been to Utah.

3. I served on the Board of Directors of (i) Purdue Pharma Inc. ("PPI") throughout the Period until September 27, 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. Other than holding the titles of Senior Vice President of PPLP and PPI from December 1, 1999, until May 31, 2007, and Vice President of PFC from April 25, 1994, 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 8th day of April, 2019, at Stafford County, Connecticut

Kathe A. Sackler

KATHE A. SACKLER
Printed Name


Signature