

Mary Woods 30(b)(6) Deposition - Dep Aid

The testimony given by Ms. Woods in her capacity as a FRCP Rule 30(b)(6) witness and the supporting information herein is offered on behalf of Allergan Finance, LLC and Allergan plc (a foreign corporation deemed by the Court to be a party to the case over Allergan objection and with reservation of all rights) (collectively "Allergan"). In addition to being prepared to testify as a corporate representative for defendants Allergan Finance LLC and Allergan plc (over objection), she has also conducted research and is prepared to respond to questions about information available to Allergan regarding former affiliates that are now owned by Teva (the "Actavis Generics.")

#	Topic	Documents and Notes	Preparation work done
5	Identification of Your policies and procedures Concerning Your duties under the CSA or state and local laws and regulations Concerning the Diversion of Opioids as well as any Persons or committees tasked with detecting Diversion of Opioids, or Suspicious Orders and whether the position's compensation was based, in whole or in part, on levels of sales of Controlled Substances or Opioid Products.	<p><u>Policies and Procedures</u></p> <p><u>Watson Pharmaceuticals, Inc.:</u></p> <ul style="list-style-type: none"> ALLERGAN_MDL_01844864 (Tab 1) <ul style="list-style-type: none"> • Sept. 3, 2001 • Customer Support Service SOMS - Manfact ALLERGAN_MDL_01844724 (Tab 2) <ul style="list-style-type: none"> • June 14, 2002 • New Launch - Manfact ALLERGAN_MDL_01839001 (Tab 3) <ul style="list-style-type: none"> • May 3, 2004 • Operational Procedure Document - SOM -SAP ALLERGAN_MDL_03951885 (Tab 4) <ul style="list-style-type: none"> • Sept. 19, 2005 • Corporate Standard Operating Procedure 11-004 Acquired_Actavis_01495929 (Tab 5) <ul style="list-style-type: none"> • Sept. 23, 2005 • Operational Procedure document - SOM - SAP ALLERGAN_MDL_03953044 (Tab 6) <ul style="list-style-type: none"> • Nov. 17, 2005 • Master Data / License / Operational Procedure Document ALLERGAN_MDL_03952774 (Tab 7) <ul style="list-style-type: none"> • April 4, 2007 • Master Data / License / Operational Procedure Document ALLERGAN_MDL_03641386 (Tab 8) <ul style="list-style-type: none"> • April 7 2009 • Corporate Standard Operating Procedure 11-004 ALLERGAN_MDL_02467151 (Tab 9) <ul style="list-style-type: none"> • June 8, 2009 • Corporate Standard Operating Procedure 11-004 ALLERGAN_MDL_02146521 (Tab 10) <ul style="list-style-type: none"> • July 19, 2011 • Corporate Standard Operating Procedure CSOP 11-004 ALLERGAN_MDL_01175574 (Tab 11) <ul style="list-style-type: none"> • January 5, 2012 • Master Data / License / <p><u>Primary Persons</u></p> <p>The primary persons tasked with detecting diversion of opioids or suspicious orders include:</p> <p><u>Watson Pharmaceuticals, Inc.:</u></p> <ul style="list-style-type: none"> • Mary Woods - Executive Director, Customer Relations Operations; U.S. Order Management (1995-present) • Tom Napoli - Associate Director, Controlled Substance Compliance (2003-2016) • Lynn DaCunha - Supervisor, Order Processing (2000-present) • Tracey Hernandez - Director, Corporate Controlled Substance Compliance (2002-2010) • Sandra Simmons - Manager, Support Services and Customer Master (2002-2017); <p><u>Actavis Inc.:</u></p> <ul style="list-style-type: none"> • Rachelle Galant - Senior Product Manager (2009-2015) • Nancy Baran - Director, Customer Service (2008-2016) • Michael Clarke - VP Ethics & Compliance (2012-2017) • Jinping McCormick - Director, Marketing (2004-2013) • Michael Perfetto - VP, Sales & Marketing (2004-2015) • John LaRocca - VP Legal Affairs (2000-2015) • Kelly Smith - Sr. Director of US Security and DEA Affairs (2004-2012) <p><u>Allergan Finance, LLC f/k/a Actavis, Inc.:</u></p> <ul style="list-style-type: none"> • Mary Woods - Executive Director, Customer Relations Operations; U.S. Order Management (1995-present) • Tom Napoli - Associate Director, Controlled Substance Compliance (2003-2016) • William Simmons - Compliance Auditor/Investigator, DEA Affairs (2009-2016) • Sandra Simmons - Manager, Support Services and Customer Master (2002-2017) <p><u>Compensation</u></p> <p>Allergan has identified personnel files for Mary Woods, Michael Clarke, Nancy Baran, Rachelle Galant, John LaRocca, Lynn DaCunha, and William Simmons. Based on the information within these files and Allergan's investigation to date, Allergan has determined that neither base salaries nor bonuses were not tied to any specific product or sale of opioids. Salary increases were generally based on performance rating, merit, and promotions. Bonus compensation was as follows:</p> <ul style="list-style-type: none"> • Nancy Baran, Rachelle Galant, and John LaRocca - Bonuses were based in part upon the company's overall sales performance, and in part on the individual's performance based on portfolio level (not product level) performance goals and personal objectives. Long term incentive compensation was based on Actavis Inc. performance goals achieved over a three-year period, phantom stock value, salary, individual performance rating as evidenced in Per4ma evaluations, and the individual's level within the organization. • Michael Clarke - Short term bonuses were based on achievement of annual business goals and personal objectives. Long term incentive compensation was based on Actavis Inc. performance goals achieved over a three-year period, phantom stock value, salary, individual performance rating from his Per4ma 	<ul style="list-style-type: none"> ✓ Reviewed deposition transcripts of Nancy Baran, Michael Clarke, and Michael Perfetto ✓ Interviewed Lynn DaCunha, Rachelle Galant, Tom Napoli, Tracey Hernandez, and Andrea Alfano. ✓ Reviewed policies, procedures, emails, meeting minutes, organization charts, forms, and other documents related to suspicious order monitoring systems and processes.

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#	Topic	Documents and Notes	Preparation work done	
		<p>Operational Procedure Document</p> <p><u>Actavis Inc.:</u></p> <p>ALLERGAN_MDL_02081243 (Tab 12)</p> <ul style="list-style-type: none"> • Nov. 2000 - Aug. 2009 • Nancy Baran email <p>ALLERGAN_MDL_02128514 (Tab 13)</p> <ul style="list-style-type: none"> • Nov. 3, 2010 • Logic <p>ALLERGAN_MDL_00490306 (Tab 14)</p> <ul style="list-style-type: none"> • March 17, 2011 • Standard Operating Procedure for Oxycodone <p>ALLERGAN_MDL_01684748 (Tab 15)</p> <ul style="list-style-type: none"> • Parallel mode - March 2012 • Go live - October 2012 • Direct Standard Operating Procedure <p>ALLERGAN_MDL_01979834 (Tab 16)</p> <ul style="list-style-type: none"> • October 2012 • Indirect Standard Operating Procedure <p><u>Allergan Finance, LLC f/k/a Actavis, Inc.:</u></p> <p>ALLERGAN_MDL_03750135 (Tab 17)</p> <ul style="list-style-type: none"> • June 5, 2014 • Master Data / License / Operating Procedure <p>ALLERGAN_MDL_02146301 (Tab 18)</p> <ul style="list-style-type: none"> • Jan. 6, 2016 • Controlled Substance Compliance Team- Standard Operating Procedure <p>ALLERGAN_MDL_02146081 (Tab 19)</p> <ul style="list-style-type: none"> • Jan. 11, 2016 • Suspicious Order Monitoring Program Overview <p>ALLERGAN_MDL_02146077 (Tab 20)</p> <ul style="list-style-type: none"> • Jan. 11, 2016 • DEA Affairs - Order of Interest evaluation <p>ALLERGAN_MDL_02146314 (Tab 21)</p> <ul style="list-style-type: none"> • Jan. 11, 2016 • Customer Due Diligence Overview <p>ALLERGAN_MDL_02176554 (Tab 22)</p> <ul style="list-style-type: none"> • Jan. 11, 2016 	<p>evaluation, and level within the organization.</p> <ul style="list-style-type: none"> • Mary Woods and Lynn DaCunha - Annual bonuses were based on two measures: company overall performance, and individual business goal achievement. Long term incentive is a stock-based award made each year as part of annual pay for performance program, to colleagues who demonstrate leadership, future potential, sustained performance, and demonstrate critical skills to drive growth. <p>For William Simmons, there was no salary, bonus, or other compensation information available within his personnel file. Allergan has looked for and not identified personnel files for Tom Napoli, Tracey Hernandez, Sandra Simmons, JinPing McCormick, Michael Perfetto, and Kelly Smith.</p>	

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#	Topic	Documents and Notes	Preparation work done
		<ul style="list-style-type: none"> • Controlled Substance Customer Knowledge Policy (Know Your customer) <p>TEVA_MDL_A_01037228 (Tab 23)</p> <ul style="list-style-type: none"> • May 26, 2016 • Corporate Standard Operating Procedure: Controlled Substance Order Monitoring Policy <p>TEVA_MDL_A_06619234 (Tab 24)</p> <ul style="list-style-type: none"> • May 26, 2016 • Corporate Standard Operating Procedure: Controlled Substance Compliance Policy 	

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#	Topic	Documents and Notes			Preparation work done
6	<p>Identification of Your policies and procedures for, and the identities of all Persons responsible for, monitoring Suspicious Orders or potential Diversion of Opioids or Opioid Products or for auditing or investigating Suspicious Orders or potential Diversion of Opioids or Opioid Products and (a) identification of Your system(s) or processes to disclose Suspicious Orders of Opioids or report potential Diversion of Opioids or Opioid Products; and (b) identification of Your system(s) or processes to report or halt sales to those involved in any Suspicious Orders of Opioids or Opioid Products or potential Diversion of Opioids or Opioid Products. This Topic also seeks information regarding any and all third parties, including UPS or any other third party, who performed these functions on Your behalf as well as all Persons who interacted with UPS or any other third party.</p>	<p>Policies and Procedures</p> <p><u>Watson Pharmaceuticals, Inc.:</u></p> <ul style="list-style-type: none"> ALLERGAN_MDL_01844864 (Tab 1) <ul style="list-style-type: none"> • Sept. 3, 2001 • Customer Support Service SOMS - Manfact ALLERGAN_MDL_01844724 (Tab 2) <ul style="list-style-type: none"> • June 14, 2002 • New Launch - Manfact ALLERGAN_MDL_01839001 (Tab 3) <ul style="list-style-type: none"> • May 3, 2004 • Operational Procedure Document - SOM -SAP ALLERGAN_MDL_03951885 (Tab 4) <ul style="list-style-type: none"> • Sept. 19, 2005 • Corporate Standard Operating Procedure 11-004 Acquired_Actavis_01495929 (Tab 5) <ul style="list-style-type: none"> • Sept. 23, 2005 • Operational Procedure document - SOM - SAP ALLERGAN_MDL_03953044 (Tab 6) <ul style="list-style-type: none"> • Nov. 17, 2005 • Master Data / License / Operational Procedure Document ALLERGAN_MDL_03952774 (Tab 7) <ul style="list-style-type: none"> • April 4, 2007 • Master Data / License / Operational Procedure Document ALLERGAN_MDL_03641386 (Tab 8) <ul style="list-style-type: none"> • April 7 2009 • Corporate Standard Operating Procedure 11-004 ALLERGAN_MDL_02467151 (Tab 9) <ul style="list-style-type: none"> • June 8, 2009 • Corporate Standard Operating Procedure 11-004 ALLERGAN_MDL_02146521 (Tab 10) <ul style="list-style-type: none"> • July 19, 2011 • Corporate Standard Operating Procedure CSOP 11-004 ALLERGAN_MDL_01175574 (Tab 11) <ul style="list-style-type: none"> • January 5, 2012 • Master Data / License / 	<p>Primary Persons</p> <p>The primary persons responsible for monitoring suspicious orders or potential diversion of opioids, or for auditing/investigating same included:</p> <p><u>Watson Pharmaceuticals, Inc.:</u></p> <ul style="list-style-type: none"> • Mary Woods - Executive Director, Customer Relations Operations; U.S. Order Management (1995-present) • Tom Napoli - Associate Director, Controlled Substance Compliance (2003-2016) • Lynn DaCunha - Supervisor, Order Processing (2000-present) • Tracey Hernandez - Director, Corporate Controlled Substance Compliance (2002-2010) • Sandra Simmons - Manager, Support Services and Customer Master (2002-2017); <p><u>Actavis Inc.:</u></p> <ul style="list-style-type: none"> • Rachelle Galant - Senior Product Manager (2009-2015) • Nancy Baran - Director, Customer Service (2008-2016) • Michael Clarke - VP Ethics & Compliance (2012-2017) • Jinping McCormick - Director, Marketing (2004-2013) • Michael Perfetto - VP, Sales & Marketing (2004-2015) • John LaRocca - VP Legal Affairs (2000-2015) • Kelly Smith - Sr. Director of US Security and DEA Affairs (2004-2012) <p><u>Allergan Finance, LLC f/k/a Actavis, Inc.:</u></p> <ul style="list-style-type: none"> • Mary Woods - Executive Director, Customer Relations Operations; U.S. Order Management (1995-present) • Tom Napoli - Associate Director, Controlled Substance Compliance (2003-2016) • William Simmons - Compliance Auditor/Investigator, DEA Affairs (2009-2016) • Sandra Simmons - Manager, Support Services and Customer Master (2002-2017) 	<p>UPS contracts</p> <p>Actavis Inc. retained UPS to warehouse and distribute various controlled substances, prescription pharmaceuticals, and non-prescription pharmaceuticals since November 6, 2006. Amendments #1-10 between Actavis Inc. and UPS to show that the relationship continued through the end of 2012. <i>See, e.g.</i>, ALLERGAN_MDL_02758696; ALLERGAN_MDL_02823068; ALLERGAN_MDL_02823060; ALLERGAN_MDL_02822998; ALLERGAN_MDL_02823064.</p> <p>Before it was acquired by Actavis, Inc in 2015, Allergan Inc. had its own relationship with UPS through a Master Services Agreement on March 1, 2007, and another on Sept. 1, 2011. UPSSCS0002229; UPSSCS0002685; UPSSCS0002452; UPSSCS0002528.</p> <p>After acquiring Allergan, distribution shifted from the Gurnee center to UPS as of March 2016. When Allergan was no longer a DEA Registrant for the manufacture or distribution of Schedule II controlled substances, the contract manufacturer (Teva) and distributor (UPS) for Allergan's controlled substances became the only entities that conducted suspicious order monitoring for these products. ALLERGAN_MDL_01579464; ALLERGAN_MDL_01386963; ALLERGAN_MDL_03440840.</p> <p>UPS SOM</p> <p>UPS has its own independent suspicious order monitoring program since it is a DEA registrant. UPS applies a proprietary algorithm to identify orders of interest. The UPS suspicious order monitoring system is described in the following documents: ALLERGAN_MDL_01767373; ALLERGAN_MDL_01387385; ALLERGAN_MDL_01767380. For more information about the UPS suspicious order monitoring system, Allergan refers Plaintiffs to UPS.</p>	<ul style="list-style-type: none"> ✓ Reviewed deposition transcripts of Nancy Baran, Michael Clarke, and Michael Perfetto ✓ Reviewed policies, procedures, emails, meeting minutes, contracts, and other documents related to suspicious order monitoring and third parties. ✓ Interviewed Lynn DaCunha, Rachelle Galant, Tom Napoli, Tracey Hernandez, and Andrea Alfano.

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	<p>Operational Procedure Document</p> <p><u>Actavis Inc.:</u></p> <p>ALLERGAN_MDL_02081243 (Tab 12)</p> <ul style="list-style-type: none"> • Nov. 2000 - Aug. 2009 • Nancy Baran email <p>ALLERGAN_MDL_02128514 (Tab 13)</p> <ul style="list-style-type: none"> • Nov. 3, 2010 • Logic <p>ALLERGAN_MDL_00490306 (Tab 14)</p> <ul style="list-style-type: none"> • March 17, 2011 • Standard Operating Procedure for Oxycodone <p>ALLERGAN_MDL_01684748 (Tab 15)</p> <ul style="list-style-type: none"> • Parallel mode - March 2012 • Go live - October 2012 • Direct Standard Operating Procedure <p>ALLERGAN_MDL_01979834 (Tab 16)</p> <ul style="list-style-type: none"> • October 2012 • Indirect Standard Operating Procedure <p><u>Allergan Finance, LLC f/k/a Actavis, Inc.:</u></p> <p>ALLERGAN_MDL_03750135 (Tab 17)</p> <ul style="list-style-type: none"> • June 5, 2014 • Master Data / License / Operating Procedure <p>ALLERGAN_MDL_02146301 (Tab 18)</p> <ul style="list-style-type: none"> • Jan. 6, 2016 • Controlled Substance Compliance Team- Standard Operating Procedure <p>ALLERGAN_MDL_02146081 (Tab 19)</p> <ul style="list-style-type: none"> • Jan. 11, 2016 • Suspicious Order Monitoring Program Overview <p>ALLERGAN_MDL_02146077 (Tab 20)</p> <ul style="list-style-type: none"> • Jan. 11, 2016 • DEA Affairs - Order of Interest evaluation <p>ALLERGAN_MDL_02146314 (Tab 21)</p> <ul style="list-style-type: none"> • Jan. 11, 2016 • Customer Due Diligence Overview <p>ALLERGAN_MDL_02176554 (Tab 22)</p> <ul style="list-style-type: none"> • Jan. 11, 2016 • Controlled Substance Customer Knowledge Policy (Know Your 		<p>Primary persons who interacted with UPS:</p> <p><u>Actavis Inc.</u></p> <ul style="list-style-type: none"> • Nancy Baran - Director, Customer Service (2008-2016) • Michael Dorsey - Director, National Accounts • Michael DiBlasi - Senior Director, Supply Chain <p><u>Allergan Finance, LLC f/k/a Actavis, Inc.</u></p> <ul style="list-style-type: none"> • Mary Woods - Executive Director, Customer Relations Operations; U.S. Order Management (1995-present) • Laura Pinti - Associate Director of Customer Support Services, US Order Management • Sandra Simmons - Manager, Support Services and Customer Master (2002-2017) • Michael DiBlasi - Senior Director, Supply Chain 	
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		<p>customer) TEVA_MDL_A_01037228 (Tab 23)</p> <ul style="list-style-type: none">• May 26, 2016• Corporate Standard Operating Procedure: Controlled Substance Order Monitoring Policy <p>TEVA_MDL_A_06619234 (Tab 24)</p> <ul style="list-style-type: none">• May 26, 2016• Corporate Standard Operating Procedure: Controlled Substance Compliance Policy			
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#	Topic	Documents and Notes	Preparation work done
8	<p>The identity of the Persons responsible for developing or implementing training for Your sales and Marketing departments, including for developing or implementing any written materials or instructions to Your Marketing or sales people regarding promoting or selling Opioids or Opioid Products or for developing or implementing any training on identifying, reporting, or investigating the possible Diversion of Opioids or Opioid Products or identifying, investigating, or reporting Suspicious Orders.</p>	<p><i>Julie Snyder was designated to address the identity of persons responsible for providing training to individuals who promoted Kadian® and Norco®.</i></p> <p><u>People responsible for SOM / diversion training:</u></p> <p>Individuals who were responsible for developing or implementing training related to suspicious order monitoring or investigation of possible diversion include:</p> <p><u>Watson Pharmaceuticals, Inc.:</u></p> <ul style="list-style-type: none"> • Mary Woods - Executive Director, Customer Relations Operations; U.S. Order Management (1995-present) • Tom Napoli - Associate Director, Controlled Substance Compliance (2003-2016) • Tracey Hernandez - Director, Corporate Controlled Substance Compliance (2002-2010) • Sandra Simmons - Manager, Support Services and Customer Master (2002-2017); <p><u>Actavis Inc.:</u></p> <ul style="list-style-type: none"> • Rachelle Galant - Senior Product Manager (2009-2015) • Nancy Baran - Director, Customer Service (2008-2016) • Jinping McCormick - Director, Marketing (2004-2013) <p><u>Allergan Finance, LLC f/k/a Actavis, Inc.:</u></p> <ul style="list-style-type: none"> • Tom Napoli - Associate Director, Controlled Substance Compliance (2003-2016) • Sandra Simmons - Manager, Support Services and Customer Master (2002-2017) 	<ul style="list-style-type: none"> ✓ Reviewed policies, procedures, emails, meeting minutes, and other documents related to suspicious order monitoring training ✓ Interviewed Lynn DaCunha, Rachelle Galant, Tom Napoli, and Tracey Hernandez. ✓ Reviewed deposition transcripts of Nancy Baran, Michael Clarke, and Michael Perfetto

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10	<p>Identification of Your policies and procedures for, and the identity of all Persons responsible for, interacting with the U.S. Food and Drug Administration ("FDA"), the DEA, the U.S. Department of Justice, or other state and federal government agencies.</p>	<p><u>DEA Policies and Procedures:</u></p> <p>Allergan's policies and procedures regarding its interaction with the DEA relating to opioids are described in the following documents:</p> <p><u>Watson Pharmaceuticals, Inc.:</u></p> <p>ALLERGAN_MDL_01844864 (Tab 1)</p> <ul style="list-style-type: none"> • Sept. 3, 2001 • Customer Support Service SOMS - Manfact <p>ALLERGAN_MDL_01844724 (Tab 2)</p> <ul style="list-style-type: none"> • June 14, 2002 • New Launch - Manfact <p>ALLERGAN_MDL_01839001 (Tab 3)</p> <ul style="list-style-type: none"> • May 3, 2004 • Operational Procedure Document - SOM - SAP <p>ALLERGAN_MDL_03951885 (Tab 4)</p> <ul style="list-style-type: none"> • Sept. 19, 2005 • Corporate Standard Operating Procedure 11-004 <p>Acquired_Actavis_01495929 (Tab 5)</p> <ul style="list-style-type: none"> • Sept. 23, 2005 • Operational Procedure document - SOM - SAP <p>ALLERGAN_MDL_03953044 (Tab 6)</p> <ul style="list-style-type: none"> • Nov. 17, 2005 • Master Data / License / Operational Procedure Document <p>ALLERGAN_MDL_03952774 (Tab 7)</p> <ul style="list-style-type: none"> • April 4, 2007 • Master Data / License / Operational Procedure Document <p>ALLERGAN_MDL_03641386 (Tab 8)</p> <ul style="list-style-type: none"> • April 7 2009 • Corporate Standard Operating Procedure 11-004 <p>ALLERGAN_MDL_02467151 (Tab 9)</p> <ul style="list-style-type: none"> • June 8, 2009 • Corporate Standard Operating Procedure 11-004 <p>ALLERGAN_MDL_02146521 (Tab 10)</p> <ul style="list-style-type: none"> • July 19, 2011 • Corporate Standard Operating Procedure CSOP 11-004 <p>ALLERGAN_MDL_01175574 (Tab 11)</p> <ul style="list-style-type: none"> • January 5, 2012 <p><u>Watson Pharmaceuticals, Inc.:</u></p> <ul style="list-style-type: none"> • Tom Napoli - Associate Director, Controlled Substance Compliance; Manager, Security and DEA Affairs (2003-2016) • Tracey Hernandez - Director, Corporate Controlled Substance Compliance (2002-2010) <p><u>Actavis Inc.:</u></p> <ul style="list-style-type: none"> • Michael Clarke - VP Ethics & Compliance (2012-2017) • Kelly Smith - Sr. Director of US Security and DEA Affairs (2004-2012) <p><u>Allergan Finance, LLC f/k/a Actavis, Inc.:</u></p> <ul style="list-style-type: none"> • Tom Napoli - Associate Director, Controlled Substance Compliance (2003-2016) • William Simmons - Compliance Auditor/Investigator, DEA Affairs (2009-2016) • Lynn DaCunha - Supervisor, Order Processing (2000-present) <p><i>Julie Snyder was designated to address the primary persons who communicate with the FDA.</i></p> <p>Primary persons responsible for interacting with the DEA regarding suspicious order monitoring or diversion include:</p>	<ul style="list-style-type: none"> ✓ Reviewed policies, procedures, emails, and other documents related to interactions with the DEA. ✓ Interviewed Lynn DaCunha, Rachelle Galant, Tom Napoli, and Tracey Hernandez. ✓ Reviewed deposition transcripts of Nancy Baran, Michael Clarke, and Michael Perfetto

		<ul style="list-style-type: none"> • Master Data / License / Operational Procedure Document <p><u>Actavis Inc.:</u></p> <p>ALLERGAN_MDL_02081243 (Tab 12)</p> <ul style="list-style-type: none"> • Nov. 2000 - Aug. 2009 • Nancy Baran email <p>ALLERGAN_MDL_02128514 (Tab 13)</p> <ul style="list-style-type: none"> • Nov. 3, 2010 • Logic <p>ALLERGAN_MDL_00490306 (Tab 14)</p> <ul style="list-style-type: none"> • March 17, 2011 • Standard Operating Procedure for Oxycodone <p>ALLERGAN_MDL_01684748 (Tab 15)</p> <ul style="list-style-type: none"> • Parallel mode - March 2012 • Go live - October 2012 • Direct Standard Operating Procedure <p>ALLERGAN_MDL_01979834 (Tab 16)</p> <ul style="list-style-type: none"> • October 2012 • Indirect Standard Operating Procedure <p><u>Allergan Finance, LLC f/k/a Actavis, Inc.:</u></p> <p>ALLERGAN_MDL_03750135 (Tab 17)</p> <ul style="list-style-type: none"> • June 5, 2014 • Master Data / License / Operating Procedure <p>ALLERGAN_MDL_02146301 (Tab 18)</p> <ul style="list-style-type: none"> • Jan. 6, 2016 • Controlled Substance Compliance Team-Standard Operating Procedure <p>ALLERGAN_MDL_02146081 (Tab 19)</p> <ul style="list-style-type: none"> • Jan. 11, 2016 • Suspicious Order Monitoring Program Overview <p>ALLERGAN_MDL_02146077 (Tab 20)</p> <ul style="list-style-type: none"> • Jan. 11, 2016 • DEA Affairs - Order of Interest evaluation <p>ALLERGAN_MDL_02146314 (Tab 21)</p> <ul style="list-style-type: none"> • Jan. 11, 2016 • Customer Due Diligence Overview <p>ALLERGAN_MDL_02176554 (Tab 22)</p> <ul style="list-style-type: none"> • Jan. 11, 2016 • Controlled Substance Customer Knowledge Policy (Know Your customer) <p>TEVA_MDL_A_01037228 (Tab 23)</p> <ul style="list-style-type: none"> • May 26, 2016 • Corporate Standard Operating Procedure: Controlled Substance Order Monitoring Policy <p>TEVA_MDL_A_06619234 (Tab 24)</p> <ul style="list-style-type: none"> • May 26, 2016 		
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		<ul style="list-style-type: none">• Corporate Standard Operating Procedure: Controlled Substance Compliance Policy		
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#	Topic	Documents and notes	Preparation work done
16	The identity of all Persons who were responsible for representing You or who participated in, or were responsible for coordinating, managing, or directing Your participation in, the Healthcare Distribution Management Alliance ("HDMA," now known as the Healthcare Distribution Alliance, "HDA"). This includes the identity of Persons who attended HDMA meetings on Your behalf.	<p>The following individuals have attended (or do attend) Healthcare Distribution Management Alliance ("HDMA") meetings:</p> <p><u>Actavis Inc.</u></p> <ul style="list-style-type: none"> • Michael Perfetto - VP, Sales & Marketing (2004-2015) • Nancy Baran - Director, Customer Service (2008-2016) • Jinping McCormick - Director, Marketing (2004-2013) • David Myers - Senior Manager, Products & Communications (2003 - 2016) • Rachelle Galant - Senior Product Manager (2009-2015) • Ara Aprahamian - Director, Pricing & Contracts (2009 - 2015) <p><u>Allergan Finance, LLC f/k/a Actavis, Inc.</u></p> <ul style="list-style-type: none"> • Mary Woods - Executive Director, Customer Relations Operations; U.S. Order Management (1995-present) • Paul Reed - Executive Director, Trade Sales & Operations • Mike Reed - Executive Director, Trade Sales • Brandon Miller - Associate Vice President, Trade & OTC Sales <p>Allergan has conducted a reasonable investigation and has not identified any person who had responsibility for representing Allergan or coordinating, managing, or directing Allergan's participation in HDMA meetings.</p>	<ul style="list-style-type: none"> ✓ Interviewed Paul Reed and Brandon Miller ✓ Interviewed Rachelle Galant ✓ Reviewed documents regarding HDMA attendance.

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#	Topic	Documents and Notes		Preparation work done
21	<p>The role of wholesalers, distributors, and pharmacies, including, but not limited to, Defendants, in the supply chain for Your Opioid Products and the responsibilities of each with respect to Marketing, sales, supply, Suspicious Order monitoring, and potential diversion.</p>	<p><i>Julie Snyder was designated to discuss responsibilities with respect to marketing, sales, and supply.</i></p> <p>The roles of wholesalers and distributors with respect to suspicious order monitoring and prevention of diversion are described in the following documents:</p> <p><u>Watson Pharmaceuticals, Inc.:</u></p> <ul style="list-style-type: none"> ALLERGAN_MDL_01844864 (Tab 1) <ul style="list-style-type: none"> • Sept. 3, 2001 • Customer Support Service SOMS - Manfact ALLERGAN_MDL_01844724 (Tab 2) <ul style="list-style-type: none"> • June 14, 2002 • New Launch - Manfact ALLERGAN_MDL_01839001 (Tab 3) <ul style="list-style-type: none"> • May 3, 2004 • Operational Procedure Document - SOM -SAP ALLERGAN_MDL_03951885 (Tab 4) <ul style="list-style-type: none"> • Sept. 19, 2005 • Corporate Standard Operating Procedure 11-004 Acquired_Actavis_01495929 (Tab 5) <ul style="list-style-type: none"> • Sept. 23, 2005 • Operational Procedure document - SOM - SAP ALLERGAN_MDL_03953044 (Tab 6) <ul style="list-style-type: none"> • Nov. 17, 2005 • Master Data / License / Operational Procedure Document ALLERGAN_MDL_03952774 (Tab 7) <ul style="list-style-type: none"> • April 4, 2007 • Master Data / License / Operational Procedure Document ALLERGAN_MDL_03641386 (Tab 8) <ul style="list-style-type: none"> • April 7 2009 • Corporate Standard Operating Procedure 11-004 ALLERGAN_MDL_02467151 (Tab 9) <ul style="list-style-type: none"> • June 8, 2009 • Corporate Standard Operating Procedure 11-004 ALLERGAN_MDL_02146521 (Tab 10) <ul style="list-style-type: none"> • July 19, 2011 • Corporate Standard Operating Procedure CSOP 11-004 ALLERGAN_MDL_01175574 (Tab 11) <ul style="list-style-type: none"> • January 5, 2012 • Master Data / License / Operational Procedure Document <p><u>Actavis Inc.:</u></p> <ul style="list-style-type: none"> ALLERGAN_MDL_02081243 (Tab 12) <ul style="list-style-type: none"> • Nov. 2000 - Aug. 2009 • Nancy Baran email 	<p><u>Wholesaler / Distributor role in SOM:</u></p> <p>Each wholesaler and distributor, as a DEA registrant, completes its own SOM program.</p> <p>As part of Allergan's SOM Program, wholesalers and distributors, among other things:</p> <ul style="list-style-type: none"> • completed Know Your Customer questionnaires • executed customer compliance acknowledgement forms • participated in partnership calls or meetings • provided information about ownership • provided information about state and federal licenses • provided information about controlled substance / non-controlled substance utilization • provided historical purchasing reports • provided customer listing by volume • provided information about their own SOM programs, policies, and procedures • provided information and supporting documentation about an order flagged by Allergan's SOM algorithm. <p>UPS has its own independent suspicious order monitoring program since it is a DEA registrant. UPS applies a proprietary algorithm to identify orders of interest. The UPS suspicious order monitoring system is described in the following documents: ALLERGAN_MDL_01767373; ALLERGAN_MDL_01387385; ALLERGAN_MDL_01767380. For more information about the UPS suspicious order monitoring system, Allergan refers Plaintiffs to UPS.</p> <p><u>ValueCentric</u></p> <ul style="list-style-type: none"> • Actavis Kadian LLC contracted with ValueCentric in February 2009. ALLERGAN_MDL_01447847 • Added Safe and Secure module in December 2011. ALLERGAN_MDL_01451450 • Added Market Visibility module in August 2012. ALLERGAN_MDL_00041967 	<ul style="list-style-type: none"> ✓ Reviewed documents related to the role of wholesalers, distributors, and pharmacies with respect to suspicious order monitoring and diversion ✓ Reviewed documents related to data sources provided by wholesalers, distributor, and/or pharmacies. ✓ Interviewed Lynn DaCunha, Rachelle Galant, Tom Napoli, and Tracey Hernandez.

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		<p>ALLERGAN_MDL_02128514 (Tab 13)</p> <ul style="list-style-type: none"> • Nov. 3, 2010 • Logic <p>ALLERGAN_MDL_00490306 (Tab 14)</p> <ul style="list-style-type: none"> • March 17, 2011 • Standard Operating Procedure for Oxycodone <p>ALLERGAN_MDL_01684748 (Tab 15)</p> <ul style="list-style-type: none"> • Parallel mode - March 2012 • Go live - October 2012 • Direct Standard Operating Procedure <p>ALLERGAN_MDL_01979834 (Tab 16)</p> <ul style="list-style-type: none"> • October 2012 • Indirect Standard Operating Procedure <p><u>Allergan Finance, LLC f/k/a Actavis, Inc.:</u></p> <p>ALLERGAN_MDL_03750135 (Tab 17)</p> <ul style="list-style-type: none"> • June 5, 2014 • Master Data / License / Operating Procedure <p>ALLERGAN_MDL_02146301 (Tab 18)</p> <ul style="list-style-type: none"> • Jan. 6, 2016 • Controlled Substance Compliance Team- Standard Operating Procedure <p>ALLERGAN_MDL_02146081 (Tab 19)</p> <ul style="list-style-type: none"> • Jan. 11, 2016 • Suspicious Order Monitoring Program Overview <p>ALLERGAN_MDL_02146077 (Tab 20)</p> <ul style="list-style-type: none"> • Jan. 11, 2016 • DEA Affairs - Order of Interest evaluation <p>ALLERGAN_MDL_02146314 (Tab 21)</p> <ul style="list-style-type: none"> • Jan. 11, 2016 • Customer Due Diligence Overview <p>ALLERGAN_MDL_02176554 (Tab 22)</p> <ul style="list-style-type: none"> • Jan. 11, 2016 • Controlled Substance Customer Knowledge Policy (Know Your customer) <p>TEVA_MDL_A_01037228 (Tab 23)</p> <ul style="list-style-type: none"> • May 26, 2016 • Corporate Standard Operating Procedure: Controlled Substance Order Monitoring Policy <p>TEVA_MDL_A_06619234 (Tab 24)</p> <ul style="list-style-type: none"> • May 26, 2016 • Corporate Standard Operating Procedure: Controlled Substance Compliance Policy 		
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