

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION</b>	<b>Case No. 1:17-MD-2804</b>
<i>APPLIES TO ALL CASES</i>	<b>Hon. Dan A. Polster</b>

**IQVIA DECLARATION REGARDING DOCUMENTS PROVIDED BY IQVIA INC. TO  
DEFENDANTS TEVA PHARMACEUTICAL INDUSTRIES LTD., TEVA  
PHARMACEUTICALS USA, INC., and WATSON PHARMACEUTICALS, INC.**

I, Laura M. Kibbe, hereby declare as follows:

1. I currently serve as the Assistant General Counsel of IQVIA Inc. (“IQVIA”) and have worked at IQVIA since 2017.

2. IQVIA is a non-party to the above-captioned case or related cases (the “Litigation”). During the course of the Litigation, IQVIA received one or more document requests from Plaintiffs. In response to those document requests, and pursuant to one or more MDL Discovery Rulings, IQVIA provided documents to TEVA PHARMACEUTICAL INDUSTRIES LTD., TEVA PHARMACEUTICALS USA, INC., and WATSON PHARMACEUTICALS, INC. (collectively “Teva”) for production to Plaintiffs, including the documents identified in Paragraph 2a. below.

2a. Documents which IQVIA provided to Teva for production included the following Bates range(s):

Document Name	Beginning Bates No.	Ending Bates No.
9/22/2011 email from Robert Williamson to Tom Napoli, et al.	Teva_IQVIA_0020874	Teva_IQVIA_0020874
9/21/2011 cover letter from Robert Williamson to Tom Napoli w/ SOM	Teva_IQVIA_0020875	Teva_IQVIA_0020882



Assessment of Watson Pharmaceuticals (attached to above email)		
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3. The documents identified in Paragraph 2a., with the exception of the “CONFIDENTIAL” mark and Bates numbering at the bottom of each page, are exact copies of documents that were located within the possession, custody, or control of IQVIA.

4. The documents identified in Paragraph 2a. were made/executed at or near the execution dates identified on the documents, were made/executed by an employee, agent and/or representative of IQVIA having knowledge of those matters, were kept in the course of IQVIA’s regularly conducted business activity, and making/executing the documents was a regular practice of such IQVIA business activity.

5. IQVIA reserves all rights and objections regarding any public disclosure of the documents identified in Paragraph 2a., and nothing herein consents to the public disclosure of personal identifying information; confidential commercial information, trade secret, or proprietary information; or the confidential, trade secret, or proprietary information of third parties with whom IQVIA has confidentiality agreements.

Executed on February 17, 2022.



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Laura M. Kibbe  
Assistant General Counsel  
IQVIA Inc.