No.	Topic	Objections	Notes	References
1.	The organizational structure and changes related to the acquisitions and changes to Your corporate organization including the acquisition of Cephalon, Inc. in 2011; acquisition of Allergan/Actavis's generic pharmaceutical business in 2015, and the integration of Your businesses and the business as they relate to the sale, promotion, Marketing, manufacture, and distribution of Opioids and Opioid Products; and the acquisition of any other entity or business that manufactured, marketed, sold or distributed Opioids or Opioid Products (Barr Pharmaceuticals, etc.).	The Teva Defendants object to Topic No. 1 on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case. The Teva Defendants further object to this Topic to the extent it requires them to testify regarding Teva Pharmaceutical Industries, Ltd., which is not subject to personal jurisdiction in this action. The Teva Defendants further object to the terms "organizational structure" and "the integration of Your businesses" as vague and/or ambiguous. Subject to and without waiver of the foregoing objections, the Teva Defendants will present a witness to testify on this Topic.	Based on the Teva Defendants' reasonable investigation to date, the following acquisitions involved entities that manufactured, marketed, sold or distributed Opioids or Opioid products. • Appendix 1 -Current corporate structure • In 2006, Teva Ltd. acquired Ivax Corporation. Ivax Corporation is now a direct subsidiary of Teva USA. Ivax manufactured Guiatuss AC Syryp, CV (Sugar Free), which was discontinued in 2007, and Tramadol/Acetaminophen tablets, which was discontinued in 2013. • In 2008, Teva Ltd. acquired Barr Pharmaceuticals, Inc. Barr Corporation is now a direct subsidiary of Teva USA. Barr manufactured acetaminophen with codeine, which is still actively sold by Teva USA. • In October 2011, Teva Ltd. acquired Cephalon, Inc. Cephalon manufactured Actiq and Fentora. • In August 2016, Teva Ltd. acquired Allergan plc's worldwide generic pharmaceuticals business, Actavis. This included the acquisition of: o Actavis LLC o Actavis Pharma, Inc. o and Watson Laboratories, Inc. • History of Acquired Actavis Entities: **Actavis LLC** (fka Actavis Inc., incorporated in Delaware in 2005 and converted to LLC in 2013) • Actavis Inc. was an indirect subsidiary of Watson Pharmaceutical, Inc. • Actavis Inc. is distinct from Actavis, Inc., which was the company that survived after the Watson merger. **Actavis Pharma, Inc.** (fka Watson Pharma, Inc. (2001-2013), fka Schein Pharmaceutical, Inc. (1993-2001)) • Schein Pharmaceutical, Inc. was incorporated in Delaware 1993. • Watson Pharma, Inc. was incorporated in Delaware 1999. • Watson Pharmaceuticals, Inc. acquired Schein Pharmaceutical, Inc. in 2000. • Schein Pharmaceutical, Inc. merged with Watson Pharma, Inc in 2001. Watson Pharma, Inc. and Schein Pharmaceutical PA, Inc. merged with and into Schein Pharmaceutical, Inc. and resulting name of the corporation Watson Pharma, Inc. • Name change to Actavis Pharma, Inc. in 2013. **Watson Laboratories, Inc.** (incorporated in Nevada on Feb. 20, 1992) • Zetachron, Incorporated merged into Watson Laboratories, Inc. in 1995. • Oclassen Pharmaceuticals, Inc. merged into Watson Laboratories, Inc. in 1999.	Brian Shanahan Appendix 1 Corporate Disclosure Statements Allergan_MDL_02186860 – Allergan_MDL_02186869 (Org Structure at Teva/Actavis acquisition)

No.	Topic	Objections	Notes	References
			• Asset Transfer Agreement dated February 20, 1992 between Watson Pharmaceuticals, Inc. to Watson Laboratories, Inc., with Watson Pharmaceuticals, Inc. transferring all assets owned to Watson Laboratories, Inc. • Watson Pharmaceuticals, Inc. was parent company.	
3.	The identity of Your Board of Directors and the composition and responsibilities of any Board committees, task forces, or working groups comprised of Board members related to Opioids or Opioid Products.	The Teva Defendants object to Topic No. 3 on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case. The Teva Defendants further object to this Topic to the extent it requires them to testify regarding Teva Pharmaceutical Industries, Ltd., which is not subject to personal jurisdiction in this action. The Teva Defendants further object to this Topic because this Topic seeks information that is publicly available. Subject to and without waiver of the foregoing objections, the Teva Defendants will present a witness to testify on this Topic.	Based on the Teva Defendants' reasonable investigation to date, none of the Teva Defendant entities had Board committees, task forces or working groups comprised of Board members related to Opioids or Opioid Products. A listing of current and past directors for the Teva Defendant entities, that could be identified based on the Teva Defendants' reasonable investigation, is attached as Appendix 2.	Brian Shanahan
4.	The structure of Your sales and/or marketing departments for Opioid Products, including divisions within each department (i.e. regional/segment/area divisions for sales and marketing, and marketing divisions responsible for CME, KOLs, Speakers, E-detailing, Medical Communications, Internet/Websites, Public Relations, etc.), the job responsibilities for each position in Your sales and marketing departments, the lines of direct or indirect reporting for each position and whether the position's compensation is based in whole or in part on levels of sales of Controlled Substances or Opioid Products.	The Teva Defendants object to Topic No. 4 on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case. The Teva Defendants further object to this Topic to the extent it calls for testimony regarding "each position" in the sales and marketing departments. The Teva Defendants further object to the term "structure" as vague and/or ambiguous. Subject to and without waiver of the foregoing objections, the Teva Defendants will present a witness to testify on this Topic. This testimony will encompass the structure and job responsibilities for the sales and marketing departments generally; however, it will not include this information for each individual by year or discuss each position individually. The Teva Defendants also refer Plaintiffs to the organizational charts in their document production at TEVA_MDL_A_00455207 – TEVA_MDL_A_00497801 and TEVA_MDL_A_00516839 –	For Actiq and Fentora, the sales department was generally structured such that there would be a Vice President or Senior Director of Sales for a therapeutic area (e.g., PCS), Regional Directors would report to the VP or Senior Director and Area Sales Managers would report up to the Regional Director. The marketing department was structured similarly in that there was a Vice President for a therapeutic area. There were directors and senior directors who reported to the Vice President and product managers and senior product managers who reported to directors. For the sales department, compensation plans detailing the components of an individual's compensation have been produced and identified in a written response. *See* Response to Topic 9. For the marketing department, incentive compensation was based on a combination of individual performance goals and the company's performance. The company's performance includes its entire portfolio of products. For Teva USA generics: • Current Structure: o Generics Marketing: SVP Customer & Marketing Operations, Christine Baeder	Matt Day, Christine Baeder, David Meyers. Organizational Charts: TEVA_MDL_A_00456349 – Cephalon 2008 TEVA_MDL_A_00456464 – Cephalon 2010 TEVA_MDL_A_00537729 – Teva 2015 Allergan_MDL_02186860 – org structure at Teva/Actavis acquisition) Allergan_MDL_00493069 – Sales and Marketing Organization June 2012 Teva Defendants' Written Response to 30(b)(6) Topic 9.

No.	Topic	Objections	Notes	References
		TEVA_MDL_A_00538894 and the documents that have been and/or will be produced in response to Request for Production Nos. 25 and 27.	▪ VP Marketing – Napoleon Clark ▪ Sr. Dir. Pricing – Kevin P. Galownia ▪ Dir. New Products – Jennifer M. King ▪ Sr. Dir. Customer Operations – Michelle Osmian ▪ Sr. Dir. NPL Business Analytics – Richard C. Rogerson o Generics Sales: ▪ VP, Trade Relations – Chris Doerr (generic trade sales) ▪ VP, IDNs and Institutional Accounts – Daniel Salomon (generic institutional sales) (left Teva in Oct. 2018) o TEVA_MDL_A_03423711- TEVA_MDL_A_03432524 • <u>Structure at time of Actavis acquisition:</u> o Marketing: SVP Customer & Marketing Operations, Christine Baeder ▪ VP Marketing – Napoleon Clark ▪ Sr. Dir. Pricing – Kevin P. Galownia ▪ Sr. Dir. Customer Service – Nancy Baran ▪ Sr. Dir. Customer Operations – Michelle Osmian ▪ Sr. Dir. New Products, Business Analytics & Systems – Richard C. Rogerson o Sales: SVP Sales US Generics - Mark Falkin ▪ Sr. Dir. Institutional Sales – John Fallon ▪ Various Directors of National Accounts – Teri Coward, Mike Dorsey, Tony Giannone, Cassie Dunrud, Jocelyn Baker o ALLERGAN_MDL_02186860 • <u>Teva organizational charts:</u> o 2018 – TEVA_MDL_A_03423711- TEVA_MDL_A_03432524 o 2016-2017 – TEVA_MDL_A_03414628-TEVA_MDL_A_03423710 o 2011-2014 – TEVA_MDL_A_00459859-TEVA_MDL_A_00497801; o 2014-2015 – TEVA_MDL_A_00516839-TEVA_MDL_A_00538894 <u>For the Acquired Actavis Entities</u>: • Marketing and sales departments for generic products operated separately from groups responsible for branded products. • Within the generic sales group there was no division or distinction in how generic opioids were sold or marketed versus other generic products. • For the legacy Actavis company, there was a marketing, customer service and contract & pricing group. (ALLERGAN_MDL_00493069) o The marketing group was responsible for product management, new product marketing, monthly product unit forecast for production planning, financial budget and update on product sales, market research, competitive intelligence, support business development activities, corporate branding, advertising and awareness, tradeshow management and support for the sales team.	

No.	Topic	Objections	Notes	References
			○ The customer service group was responsible for supporting each customer, managing customer expectations, seeking out opportunities to enhance service levels, and executing on product launches and post launch activities. ○ The contracts & pricing group was responsible for pricing strategy and maintenance, monitoring market pricing and supply, implementing customer contracts, and supporting the sales team. ○ Within the sales group there were directors, vice presidents and managers that handled national accounts. Compensation for Sales and Marketing departments: • For the Teva USA generics and the Acquired Actavis Entities, incentive compensation was not tied to any specific product or sale of opioids. • Compensation was based in part on the company's performance and in part on an individual's performance based on performance goals set by individual managers. .	
5.	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 or vendors, 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 or vendor. For each Person Identified, please provide whether the position's compensation was based, in whole or in part, on levels of sales of Controlled Substances or Opioid Products.	The Teva Defendants object to Topic No. 5 on the grounds that it is compound, overly broad, unduly burdensome, and not proportional to the needs of the case. The Teva Defendants further object to this Topic to the extent it seeks information that is available from third parties and is therefore equally accessible to Plaintiffs. The Teva Defendants further object to this Topic to the extent it seeks testimony regarding "UPS" as well as third parties to which Teva cannot speak. The Teva Defendants further object to the terms "policies and procedures" and "system(s) or processes" as vague and/or ambiguous. Subject to and without waiver of the foregoing objections, the Teva Defendants will present a witness to testify on this Topic. This testimony will exclude the policies and procedures of third parties. The Teva Defendants also refer Plaintiffs to the documents that have been and/or will be produced in response to Request for Production No. 30.	Based upon the Teva Defendants' reasonable investigation to date, responsive policies and procedures for monitoring of Suspicious Orders or potential diversion of Opioids are set forth in Appendix 3. For Cephalon: the persons responsible for or that may have been involved with Suspicious Orders or potential diversion of Opioids were: Randy Bradway and Colleen Mcginn (Associate Director of Controlled Substances). For Teva USA: the persons responsible for or that may have been involved with Suspicious Orders or potential diversion of Opioids are or were: Colleen McGinn (Director of DEA Compliance); Joe Tomkiewicz (DEA Compliance Manager); Sarah Everingham (DEA Compliance Auditor); Dennis Ferrell (former Senior Director of DEA Compliance). In addition, customer service representatives would communicate with customers to gather additional information about pended orders. For the Acquired Actavis Entities: the persons responsible for or that may have been involved with Suspicious Orders or potential diversion of Opioids are or were: Legacy Actavis Pre-2012: Nancy Baran (Director of Customer Service), Mike Diblasi (Senior Director of Supply Chain); Rachelle Galant (Product Marketing Manager);Michael Clarke (Ethics and compliance officer); Michael Perfetto (VP Sales and Marketing); Jinping McCormick (Director of Product Marketing); Legacy Actavis 2012-2016: Tom Napoli (Manager, Security and DEA Affairs/Associate Director, Controlled Substance Compliance); Mary Woods (responsible for US Order management); Bill Hepworth (CS Specialist, Sr.); William Simmons (Compliance Auditor); Lynn DaCunha (Compliance Analyst); Mary-Lou Schoonover (DEA	Joe Tomkiewicz Materials in Appendix 2.

No.	Topic	Objections	Notes	References
			Compliance Analyst); Judy Callahan (Order Management); Bettina Dwor (Master Data Administrator) Sandra Simmons (Manager Support Services), Ella David, Vicky Lepore (SOM specialist); Mary Moskello (Master Data Administrator); Legacy Watson: Tracey Hernandez (Director, Controlled Substance Compliance); Tom Napoli; Mary Moskello (Master Data Administrator); Larry Shaffer (Master Data Administrator); William Simmons (Compliance Auditor); Sandra Simmons (Manager Support Services), Ella David (CCO Trainer); Lynn DaCunha (Compliance Analyst); Judy Callahan (Order Management); Vicky Lepore (SOM specialist). 867/852 data is wholesale aggregate data that provides certain information regarding downstream customers that purchase products. The data, which is maintained by third parties such as ValueCentric, may disclose details about the retail pharmacy chain or, less frequently, the pharmacy location that purchases products from the Teva Defendants.	
6.	The identity of all sales, marketing, advertising and promotional materials and websites you used to market or promote Opioids or Opioid Products, including the location and manner of identifying final versions of such materials and the manner of identifying the dates, venues and geographic locations in which they were used. Such materials include detail pieces, promotional items, leave-behinds, patient starter kits, patient materials, patient pain monitoring materials/devices, e-newsletters, medical communications (i.e. responses to doctor questions), journal and other ads, CME materials, Speakers Program materials, website content, webcasts and podcasts, videos (including for use in websites, CMEs, Speakers Programs, conventions), convention materials, journal wraps, audio files (including on-demand audio case studies).	The Teva Defendants object to Topic No. 6 on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case. The Teva Defendants further object to this Topic to the extent it seeks information that is publicly available. The Teva Defendants further object to this Topic to the extent that it requires them to testify regarding the "identity of all sales, marketing, advertising and promotional materials and websites," which is impracticable. Subject to and without waiver of the foregoing objections, the Teva Defendants will present a witness to testify on this Topic. This testimony will encompass relevant sales, marketing, advertising and promotional materials, and websites generally; however, it will not include the identification of each and every material.	Cephalon/Teva USA (branded): Sales, marketing, advertising and promotional materials and content from websites used to promote Actiq and/or Fentora would have been subject to internal review by PDRC or PARC committee. Over the years, various systems were used to track, approve and maintain content submissions to the committee. These systems include the ZINC (2009-2013) and VEEVA (2014-present) databases. Prior to these databases, content submissions were tracked and maintained in hard copy. Once materials were approved, Teva USA did not track whether such materials were used for specific geographic locations within the United States. The materials would have been approved for use anywhere in the United States. Teva USA generics: • Teva USA utilized Veeva for generics beginning Feb 2015 and forward. ○ TEVA_MDL_A_02914074 – TEVA_MDL_A_02914333 • Veeva Description: The Veeva Vault PromoMats application supports the promotional material review business process managed by Teva Promotion and Advertising Review Committees (PARCs). Teva will use the Veeva PromoMats application to manage the review/approval of promotional materials prior to dissemination/use within the external marketplace. These materials are submitted to the Office of Prescription Drug Promotion (OPDP) as required by the Code of Federal Regulation (21 CFR 202). The application will also be used for managing the review/approval of sales training materials. • Final versions are those that were approved by PARC. • Teva did not track the venues or geographic locations where generic promotional materials were sent. Acquired Actavis Entities:	David Meyers VEEVA, ZINC, Hard Copy Files

No.	Topic	Objections	Notes	References
			• Generics limited to product availability announcements and ads that notified customers of drug availability, form of drug and strengths available. o Examples: ALLERGAN_MDL_00478888, TEVA_MDL_A_02914345 • Generics announcement materials do not make therapeutic or product efficacy claims. • Actavis used Veeva beginning in 2014-2015 as a repository for sales and marketing materials. o Historical Actavis Veeva materials: ▪ TEVA_MDL_A_02416210 ▪ TEVA_MDL_A_02416211 ▪ TEVA_MDL_A_02416212 - TEVA_MDL_A_02416215 ▪ TEVA_MDL_A_02416216 ▪ TEVA_MDL_A_02416217 - TEVA_MDL_A_02416418 ▪ TEVA_MDL_A_02416419 ▪ TEVA_MDL_A_02416420 - TEVA_MDL_A_02416446 ▪ TEVA_MDL_A_02416447 ▪ TEVA_MDL_A_02416448 - TEVA_MDL_A_02416455 • Final versions are those that were approved by PRC or its equivalent. • Legacy Actavis entities did not track the venues or geographic locations where generic promotional materials were sent.	
7.	The identity of all Persons who were responsible for testing the safety and efficacy of Opioid Products for long-term use or for chronic pain, or who received reports, test results, studies or any other documentation regarding the testing of the safety and efficacy of Opioid Products for long-term use or for chronic pain or long-term use and the results of any such testing.	The Teva Defendants object to Topic No. 7 on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case. The Teva Defendants further object to this Topic to the extent it calls for testimony regarding "all Persons," which includes individuals who have no affiliation or relationship to the Teva Defendants and which is impracticable. Subject to and without waiver of the foregoing objections, the Teva Defendants will present a witness to testify on this Topic. This testimony will encompass the relevant departments generally; however, it will not include the identification of each and every individual. Further, this testimony will exclude individuals who were not personnel of the Teva Defendants.	To the extent there were clinical studies for long term use or for chronic pain related to Actiq and Fentora, the safety and efficacy results would have been evaluated by the Fentanyl Product Safety Team. This team met to review and discuss clinical and postmarketing safety reports for both Actiq and Fentora. The Core safety team group was led by Claire Jurkowski (GPE Pharmacovigilance Physician) and was comprised of members from the following departments: Clinical Research, Medical Affairs, Medical Information, Regulatory Affairs. Specific individuals included on this team included: As of August 2009, Leslie Killion (Global Safety/PhV); Martine Jager, Laurie Thibodeau and Jordan Cooper (Legal); Jamie Warner (Regulatory Labeling); Anne-Cecile Laborie and Bruno Baconnet (Medical Affairs –France); Susan Larijani (Medical Information); Penny Levin (Regulatory Affairs); Sheila Mathias (Regulatory); Arvind Narayana And Gregory Rippon (Medical Director); Craig Earl and Denise D'Andrea (Clinical); Shannon Carvell (Product Quality); Stacey Beckhardt (Corporate Communications); Mona Darwish (Clinical Pharmacology); Lorraine McClain (Quality Assurance); Susan McGuarn (Head of Medical Science Liaisons); Paula Castagno (Marketing); Jean-Louis Verriere, Yasmine Boulkroun, Michelle Sall, Claire Jurkowski and Kay Mcghee (US Safety/PhV).	Medical Affairs Group.

No.	Topic	Objections	Notes	References
			The Fentanyl Product Safety Group Core Team Roster for 2010-2011 included: Claire Jurkowski (GPE Pharmacovigilance Physician(US)); Ginneh Earle (GPE Pharmacovigilance Scientist (US)); Craig Earl (Clinical Research (US)); Jean-Louis Verriere (Clinical Research (EU)); Arvind Narayana (Medical Affairs (US)); Xavier Amores (Medical Affairs (EU)); Susan Larijani (Medical Information (US)); Sheila Mathias ((OTFC) - Regulatory Affairs (US)); Susan Franks ((FBT)- Regulatory Affairs (US)); Frédéric Cheneau (Regulatory Affairs (EU)). For generics, the only testing that was done was during the pre-approval process to ensure equivalency, thus there would have not been any studies to test safety or efficacy for long term use or chronic pain.	
8.	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, and the identity and location of training materials utilized for these purposes.	The Teva Defendants object to Topic No. 8 on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case. Subject to and without waiver of the foregoing objections, the Teva Defendants will present a witness to testify on this Topic. The Teva Defendants also refer Plaintiffs to the documents that have been and/or will be produced in response to Request for Production No. 24.	Teva USA/Cephalon had a sales training department that was responsible for training sales personnel on Actiq and Fentora. Individuals within this group with responsibility for training on Actiq and Fentora included: Joe Caminiti, Dan Scott, Cynthia Condodina, Lauren Mangus, Paula Castagno (Williams), Paul Vandevere. In addition to sales training, sales personnel would also be trained on compliance policies by the compliance group both as part of new hire training and training associated with Cephalon' Corporate Integrity Agreement. With respect to the launch of Fentora, sales training for the launch was led by Dan Scott and Cynthia Condodina. Various individuals were invited to train the sales force during the product launch meetings including individuals from regulatory and medical affairs. There was also a third party vendor, Corporate Training Consultants, who assisted in preparing the training curriculum. Actiq Sales trainings were led by the product team, which at various times included Andrew Pyfer, Paula Castagno (Williams), Terrence Terifay, Dean Robinson and Suzanne Richards. Sales training materials would have gone through the PDRC/PARC process and are stored in the relevant repositories. *See* Topic 6 & 40. For generics, there was no sales training related to the sales and marketing of generic opioids except for the training of the Kadian sales force related to providing availability announcements for oxymorphone. (ALLERGAN_MDL_00401497 – ALLERGAN_MDL_00401518)	Organizational Charts Sales Training Materials

No.	Topic	Objections	Notes	References
10.	Identification of Your policies and procedures for sales, marketing, regulatory, pharmacovigilance and drug safety, and compliance with regulations and conditions concerning the approval, sale, marketing and distribution of Opioids and Opioid Products.	The Teva Defendants object to Topic No. 10 on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case. Subject to and without waiver of the foregoing objections, the Teva Defendants will present a witness to testify on this Topic.	Based on the Teva Defendants reasonable investigation to date, the Teva Defendants have identified a sampling of policies and procedures set forth in Appendix 4 for sales, marketing, pharmacovigilance and drug safety, and compliance with regulations and conditions concerning approval, sale, marketing and distribution of their Opioids and Opioid Products.	Appendix 4.
11.	Your relationship with, compensation paid by You to, and identity of the Persons who interacted with, the following Person(s)/entity(s) regarding Opioids or Opioid Products: (a) American Academy of Pain Medicine; (b) American Pain Society; (c) American Pain Foundation; (d) American Geriatrics Society; (e) American Chronic Pain Association; (f) American Society of Pain Educators; (g) The National Pain Foundation; (h) Pain and Policy Studies Group; (i) Federation of State Medical Boards; (j) American Society of Pain Management Nursing; (k) Academy of Integrative Pain Management; (l) U.S. Pain Foundation; (m) Cancer Action Network; (n) Washington Legal Foundation; (o) The Center for Practical Bioethics; (p) The Joint Commission; (q) Pain Care Forum; (r) Russell Portenoy, M.D.; (s) Perry Fine, M.D.; (t) Scott Fishman, M.D.; (u) Lynn Webster, M.D.; (v) Mitchell Max, M.D.; (w) J. David Haddox, M.D.; (x) Barry Cole, M.D.; (y) Joseph Pergolizzi, M.D.; (z) Willem Scholten; and	The Teva Defendants object to Topic No. 11 on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case. The Teva Defendants further object to this Topic to the extent that it requires them to testify regarding the "identity of the Persons who interacted with, the following Person(s)/entity(s)," which is impracticable. The Teva Defendants further object to this Topic to the extent it seeks information that is available from third parties and is therefore equally accessible to Plaintiffs. The Teva Defendants further object to the terms "Your relationship with" and "interacted with" as vague and/or ambiguous. Subject to and without waiver of the foregoing objections, the Teva Defendants will present a witness to testify on this Topic. This testimony will encompass the relevant departments generally; however, it will not include the identification of each and every individual. The Teva Defendants also refer Plaintiffs to the documents that have been and/or will be produced in response to Request for Production No. 22.	Based on the Teva Defendants' reasonable investigation to date, Appendix 5 identifies independent medical education grants and other support that have been identified based on a search of hard copy grant requests forms, as well as educational grants that were tracked electronically from 2012-2016. Payments made to specific health care providers were tracked electronically from 2009-2017 and that data can be found at TEVA_MDL_A_03413816. Cephalon or Teva USA has provided support to the following individuals: Russell Portenoy, M.D., Perry Fine, M.D., Lynn Webster and Joseph Pergolizzi. TEVA_MDL_A_03413816; TEVA_MDL_A_06753556; TEVA_MDL_A_06779729. For the Acquired Actavis Entities, based on a reasonable investigation to date, they did not provide compensation related to their generic opioids to the entities or doctors listed in Topic 11.	Appendix 5

No.	Topic	Objections	Notes	References
	(aa) Alan Spanos, M.D.			
19.	The role of wholesalers, distributors, pharmacies, hospitals, formularies, and government entities, agencies and departments 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.	The Teva Defendants object to Topic No. 19 on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case. The Teva Defendants further object to this Topic on the grounds that it is overly broad and unduly burdensome because it is not limited to the Teva Defendants and thus seeks information outside of the Teva Defendants' purview. The Teva Defendants further object to the term "role" as vague and/or ambiguous. Subject to and without waiver of the foregoing objections, the Teva Defendants will present a witness to testify on this Topic.	See Letter to Honorable Claire McCaskill (TEVA_MDL_A01087806) and Topic 21.	
21.	All financial and business arrangements with any of the Defendants in this matter including any contractual relationships between You and any of the Defendants in this matter.	The Teva Defendants object to Topic No. 21 on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case. The Teva Defendants further object to this Topic to the extent that it requires them to testify regarding "[a]ll financial and business arrangements with any of the Defendants in this matter," which is impracticable. The Teva Defendants further object to the term "financial and business arrangements" as vague and/or ambiguous. Subject to and without waiver of the foregoing objections, the Teva Defendants will present a witness to testify on this Topic.	The Teva Defendants maintain contracts with wholesalers and distributors for the sale of their branded and generic products. Wholesalers and distributors would fulfill orders to pharmacies who would then provide product to patients. In addition to terms and conditions agreements with wholesalers and distributors, the Teva Defendants have identified a distribution agreement with Purdue and a supply agreement with Allergan.	TEVA_MDL_A_03434545 (2014 Purdue Agreement) TEVA_MDL_A_03504309 (2016 Allergan/Teva supply agreement)
28.	Warning letters sent to You by the FDA and the DEA regarding Your sale, marketing or distribution of Your Opioid Products, Your response to the these letters, all subsequent actions you took in response to those communications and all budgets for any such actions, by year.	The Teva Defendants object to Topic No. 28 on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case. The Teva Defendants further object to this Topic to the extent that it requires them to testify regarding the "all subsequent actions," which is impracticable. The Teva Defendants	Cephalon received one *Untitled* Letter from the FDA's division of Drug Marketing, Advertising, and Communications in March 2009. Cephalon provided a full response including confirmation that all links were taken down within hours of the receipt of the Untitled Letter. Cephalon also notified the OIG as part of its obligations under its Corporate Integrity Agreement. In a letter dated May 13, 2009, DDMAC confirmed that it considered the matter closed.	Teva_MDL_A_00342206 TEVA_MDL_A_00600496 TEVA_MDL_A_00600492

No.	Topic	Objections	Notes	References
		also object to the phrase "all subsequent actions" as vague and/or ambiguous. Subject to and without waiver of the foregoing objections, the Teva Defendants will present a witness to testify on this Topic. The Teva Defendants also refer Plaintiffs to the documents that have been and/or will be produced in response to Request for Production No. 9.		
35.	Identification of all databases regarding your Marketing Activities, including but not limited to databases reflecting all Your marketing, promotional, and advertising costs and expenditures, databases reflecting Your return on investment (ROI) of marketing activities, databases containing Your prescriber profiles and practices, and databases reflecting Your analysis of third-party data (including from IQVIA Holdings, Inc.; IMS Health; QuintilesIMS; IQVIA; Pharmaceutical Data Services; Source Healthcare Analytics; NDS Health Information Services; Verispan; Quintiles; SDI Health; ArcLight; Scriptline; Wolters Kluwer; and/or PRA Health Science, and all of their predecessor or successor companies, subsidiaries or affiliates.) and Your analysis of any such data contained in those databases.	The Teva Defendants object to Topic No. 35 on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case. The Teva Defendants further object to this Topic to the extent that "analysis of any such data contained in those databases" is overly broad and unduly burdensome. Subject to and without waiver of the foregoing objections, the Teva Defendants will present a witness to testify on this Topic. The Teva Defendants also refer Plaintiffs to the Teva Defendants' July 5, 2018 letter.	Cephalon/Teva USA received prescription data from Wolters Kluwer (prior to 2012) and from IMS that could be used to create prescriber targeting reports. When Cephalon transitioned to Teva, the company moved to an ASI reporting platform. Field personnel could access standard reports through this system and managers and above had the ability to design their own custom reports. These reports could then be exported to excel to forward to their teams. The system was updated every week, but reports could be exported and sent locally. The Acquired Actavis Entities also had access to IMS data and Wolters Kluwer data for their generic products, including opioids.	Chris Meyers David Myers

No.	Topic	Objections	Notes	References
37.	The process used to determine which medical professionals or offices Your Sales Representatives (including contracted Sales Representatives) would individually contact (in person or otherwise) with respect to Your Opioid Products, including any database or other sources of information You used to direct or suggest medical professionals or offices to contact, directions or guidelines to Sales Representatives concerning which medical professionals or offices to contact, and databases, reports or other information made available to Your sales representatives concerning prescribing histories or propensities of medical professionals.	The Teva Defendants object to Topic No. 37 on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case. The Teva Defendants further object to this Topic on the grounds that it is overly broad and unduly burdensome because it is not limited to the Teva Defendants and thus seeks information outside of the Teva Defendants' purview. The Teva Defendants further object to the term "propensities" as vague and/or ambiguous. Subject to and without waiver of the foregoing objections, the Teva Defendants will present a witness to testify on this Topic.	Cephalon/Teva USA maintained a Targeting Assessment and Call Activity policy. Sales representatives must only promote to HCPs when it is reasonable to believe that his or her practice includes patients that could be treated with Cephalon product for an on-label indication, and that it is likely that he or she would treat the on-label condition. For generics, based on their reasonable investigation to date the Teva Defendants have not identified any separate target lists of medical professional or offices provided to sales representatives for generic opioids.	Chris Meyers TEVA_MDL_A_00552695 – Targeting Assessment and Call Activity Policy
38.	Compensation for members of Your Sales department (including sales representatives, district-level managers, regional level managers, and national-level managers, regardless of title), including any formula or methods used to determine compensation, the extent to which any such compensation was based in whole or in part on levels of sales of one or more Opioid Products, the personnel involved in determining compensation, and the records of the compensation determination process.	The Teva Defendants object to Topic No. 38 on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case. Subject to and without waiver of the foregoing objections, the Teva Defendants will present a witness to testify on this Topic. The Teva Defendants also refer Plaintiffs to the documents that have been and/or will be produced in response to Request for Production No. 27.	See written response to Topic 9.	Written response to Topic 9 and Incentive Compensation plans cited therein.
40.	The process for determining the accuracy, completeness, and legality of any sales, marketing, promotional, or educational information You made available to medical professional, patients, or the	The Teva Defendants object to Topic No. 40 on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case. The Teva Defendants further object	For Cephalon/Teva USA, all promotional materials needed to be reviewed by the Product & Disease Review Committee (PDRC). The name of the committee was later changed to the Promotion and Advertising Review Process (PARC). Committee was composed of a member from the marketing team, legal, regulatory and medical affairs.	TEVA_MLD_A_0552513 (Cephalon Policy) TEVA_MDL_A_00553140 (Teva Policy)

No.	Topic	Objections	Notes	References
	public concerning any one or more Opioid products in any format, including printed materials, videos, websites, and in-person messaging or "detailing" by sales representatives.	to the extent it calls for testimony protected by attorney-client privilege, the work product doctrine, or other related privileges. Subject to and without waiver of the foregoing objections, the Teva Defendants will present a witness to testify on this Topic.	The Medical Affairs group would be responsible for developing and approving Standard Response Letters. All Standard Response Letters would be reviewed for accuracy by a Medical Information Manager, Medical Information Director and Medical Director, as appropriate. For Teva USA generics, Teva USA uses the same PARC process as the branded side. There is an abbreviated PARC approval process for the format of the standard marketing "blasts" relating to generics. The PARC committee approves the basic format of the materials, but the specific and final marketing materials are not subsequently submitted for approval. For the Acquired Actavis Entities, both legacy Watson and Actavis had promotional review committees in some form that evolved over time to review all materials prepared for generic opioids. These committees consisted of representatives from medical, regulatory, legal and compliance. Marketing and sales would make presentations to the committee that the committee would then review and approve.	TEVA_MDL_A_0552171 (SRL Policy). Acquired_Actavis_01389540 – Acquired_Actavis_01389544 – SOP RA-003 Review and Approval of Drug Advertising for All ANDA Prescription Drug Products – Actavis – July 25, 2007 Allergan_MDL_00626198 – Allergan_MDL_00626203 – SOP RA-003 Review and Approval of Drug Advertising For Prescription Drugs—Actavis—2011
45.	The organizational, communications or reporting structure between You and Teva Pharmaceuticals Industries, Ltd. and Opioids or Opioid Products.	The Teva Defendants object to Topic No. 45 on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case. The Teva Defendants further object to the extent this Topic calls for information regarding Teva Pharmaceutical Industries, Ltd., which is not subject to personal jurisdiction in this action. The Teva Defendants further object to the extent this Topic calls for testimony regarding "communications." Subject to and without waiver of the foregoing objections, the Teva Defendants will present a witness to testify on this Topic.	Appendix 1	Brian Shanahan