

1 Zachary W. Byer
KIRKLAND & ELLIS LLP
2 555 South Flower Street
Los Angeles, CA 90071
3 Tel: (213) 680-8340
zachary.byer@kirkland.com

4 Jennifer G. Levy, P.C. (*pro hac vice*)
5 KIRKLAND & ELLIS LLP
1301 Pennsylvania Ave., N.W.
6 Washington, D.C. 20004
Tel: (202) 879-5000
7 Fax: (202) 879-5200
jennifer.levy@kirkland.com

8 Donna Welch, P.C. (*pro hac vice*)
9 Timothy W. Knapp, P.C. (*pro hac vice*)
Karl Stampfl (*pro hac vice*)
10 KIRKLAND & ELLIS LLP
300 North LaSalle,
11 Chicago, IL 60654
Tel: (312) 862-2000
12 Fax: (312) 862-2200
donna.welch@kirkland.com
13 tknapp@kirkland.com
karl.stampfl@kirkland.com

14 *Attorneys for Defendants Allergan plc, Allergan Finance, LLC,*
15 *Allergan Sales, LLC, and Allergan USA, Inc.*

16 **UNITED STATES DISTRICT COURT**
17 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

18 THE CITY AND COUNTY OF SAN)
19 FRANCISCO, CALIFORNIA and THE)
PEOPLE OF THE STATE OF)
20 CALIFORNIA, Acting by and Through San)
Francisco City Attorney DENNIS J.)
21 HERRERA,)

22 *Plaintiff,*)

23 vs.)

24 PURDUE PHARMA L.P., et al.)

25 *Defendants.*)
26)
27)
28)

Case No. 3:18-CV-07591-CRB

**ALLERGAN'S SECOND AMENDED AND
SUPPLEMENTAL RESPONSES TO
PLAINTIFF'S FIRST SET OF
INTERROGATORIES TO ALLERGAN (NOS.
1-5, 7-15)**

Hon. Judge Charles R. Breyer

PLAINTIFF TRIAL
EXHIBIT
P-03464_00001

1 Pursuant to Federal Rules of Civil Procedure 26 and 33, Defendants Allergan plc,¹ Allergan
2 Finance, LLC,² Allergan Sales, LLC, and Allergan USA, Inc. (together, “Allergan”) hereby provide these
3 second amended and supplemental responses to Interrogatory Nos. 1-5 and 7-15 from Plaintiff’s First Set
4 of Interrogatories to Allergan (the “Interrogatories”).

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6 In addition to Allergan, Plaintiff’s Interrogatories are directed to (1) Actavis LLC f/k/a Actavis
7 Inc.; (2) Actavis Pharma, Inc. f/k/a Watson Pharma, Inc.; (3) Watson Laboratories, Inc.; (4) Warner
8 Chilcott Company LLC; (5) Actavis South Atlantic LLC; (6) Actavis Elizabeth LLC; (7) Actavis Mid
9 Atlantic LLC; (8) Actavis Totowa LLC; (9) Actavis Kadian LLC; (10) Actavis Laboratories UT, Inc. f/k/a
10 Watson Laboratories, Inc.-Salt Lake City; and (11) Actavis Laboratories FL, Inc. f/k/a Watson
11 Laboratories, Inc.-Florida (collectively, the “Actavis Generics Defendants”). None of the Actavis
12 Generics Defendants is affiliated with Allergan. In August 2016, Allergan plc and its subsidiaries divested
13 215 separate and distinct corporate entities, including the eleven Actavis Generics Defendants, to Teva
14 Pharmaceutical Industries Ltd. in a multi-billion dollar stock sale (collectively, the “Divested Entities”).
15 Accordingly, Allergan is not responding to Plaintiff’s Interrogatories on behalf of these other entities.
16 Nonetheless, Allergan confirms (notwithstanding the objections below) that it is not withholding
17 information within its possession, custody, or control on this basis and that its responses include
18 information reasonably accessible to Allergan regarding Schedule II generic opioids manufactured and/or
19 sold by Divested Entities, as in the MDL.
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26 ¹ Defendant Allergan plc, which was formerly known as Actavis plc and is now known as Allergan Limited, does not waive
but rather expressly preserves its objection to the Court’s personal jurisdiction over it.

27 ² Defendant Allergan Finance, LLC was formerly known as Actavis, Inc., which was formerly known as Watson
28 Pharmaceuticals, Inc.

1 **OBJECTIONS TO DEFINITIONS**

2 1. Allergan objects to the Definitions of “You” and “Your” to the extent they purport to
3 include entities beyond Allergan and its current affiliates that have had involvement with Kadian® and
4 Norco®.³ In particular, Allergan cannot respond on behalf of the Actavis Generics Defendants.

5 2. Allergan objects to the terms “Identity” and “identify” in this context as vague, ambiguous,
6 overly broad, unduly burdensome, and as not proportional to the needs of this case. Allergan will interpret
7 those terms consistent with their common meanings and does not intend to withhold responsive documents
8 on this basis.

9 3. Allergan objects to the term “Opioid(s)” as vague, ambiguous, overly broad, unduly
10 burdensome and not proportional in this context. Allergan will interpret this term to refer Kadian®,
11 Norco®, and, to the extent information about them is within Allergan’s possession, custody, or control
12 and reasonably accessible, Schedule II generic opioids manufactured and/or sold by the Actavis Generics
13 Defendants, as in the MDL.

14 4. Allergan objects to the term “Person” to the extent it includes entities other than natural
15 persons such as “any business, legal or governmental entity or association.” Allergan will interpret the
16 term “person” to mean natural person but nonetheless does not intend to withhold responsive information
17 on this basis.

18 **OBJECTIONS TO INSTRUCTIONS**

19 1. Allergan objects to Plaintiff’s statement that “[t]o the extent an Interrogatory herein calls,
20 in whole or in part, for responsive documents produced in discovery in any MDL proceeding, please
21 specifically reference the Bates stamp range of responsive documents” as overly broad, unduly
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³ As the parties previously agreed, marketing of Norco® is not at issue in this case; Norco® is only relevant as it relates to
28 Plaintiff’s suspicious order monitoring allegations. All responses and objections herein regarding Norco® are so limited.

1 4. Allergan objects to the Interrogatories to the extent that they seek to impose any
2 requirements or obligations on Allergan in addition to or different from those imposed by the Federal
3 Rules of Civil Procedure, any order that this Court has or will enter, any stipulation or agreement of the
4 Parties, or any other applicable source of governing law.

5 5. Allergan expressly reserves the right to amend or supplement these responses as necessary.

6 6. Allergan objects to the Interrogatories to the extent that the Interrogatories, or any word or
7 term used therein, are vague, ambiguous, subject to different interpretations, and/or lacking in definition.
8 Allergan will respond to the extent possible based on the most objectively reasonable interpretation of the
9 Interrogatories
10 Interrogatories

11 7. By answering, responding or objecting to any interrogatory or part thereof, Allergan does
12 not admit the existence of any information described or assumed or any allegations set forth or assumed
13 by such interrogatory or that such answer or response or objection constitutes admissible evidence. The
14 fact that Allergan has answered or responded to any interrogatory or any part thereof is not intended and
15 shall not be construed as a waiver of all or any part of any objection to any interrogatory.
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17 8. Allergan's responses are made solely for the purpose of this action.

18 9. Allergan reserves all evidentiary objections. All documents and information produced are
19 subject to all objections as to competence, relevance, privilege, materiality, propriety and admissibility.
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21 10. Allergan objects to the extent that these Interrogatories purport to call for information and
22 documents solely relating to geographical areas that are irrelevant and that are not proportional to the
23 needs of this litigation.
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1 **SPECIFIC OBJECTIONS AND RESPONSES**

2 **INTERROGATORY NO. 1:** Identify by Bates number all marketing materials that you
3 disseminated or caused to be disseminated in San Francisco⁴ or to a resident, including, but not limited to,
4 those used for sales calls (whether in person or telephonic) you made or caused to be made in San
5 Francisco or with residents. Responses to this Interrogatory include materials disseminated within San
6 Francisco or to its residents.
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8 **SEPTEMBER 13, 2021 SECOND AMENDED AND SUPPLEMENTAL RESPONSE TO**
9 **INTERROGATORY NO. 1:** Allergan incorporates by reference the General Objections, Objections to
10 Instructions, and Objections to Definitions. Allergan further objects to the extent this Interrogatory is not
11 limited to Kadian® and Norco® as overly broad, unduly burdensome, as calling for irrelevant information,
12 and as not proportional to the needs of the case.
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14 Subject to and without waiving its objections, and subject to further investigation, discovery and
15 proceedings in this matter, Allergan answers as follows:

16 Allergan states that none of the Allergan entities marketed opioids in San Francisco, in California
17 or elsewhere. As such, it has not “disseminated or caused to be disseminated” any “marketing materials”
18 anywhere.

19 Allergan states that Actavis Kadian LLC (a Divested Entity) retained Ventiv Commercial Services,
20 LLC (subsequently known as inVentiv) (“inVentiv”) to provide a contract salesforce from May 1, 2009
21 to December 31, 2012 to market Kadian® to prescribers, including (to a very limited extent) in San
22 Francisco. Divested Entity Actavis Kadian LLC’s contract with inVentiv terminated on December 31,
23 2012, and the inVentiv sales representatives did not continue to market Kadian® after shortly before (i.e.,
24 December 21, 2012). The inVentiv sales representatives who visited or attempted to visit any San
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28 ⁴ “San Francisco” refers to the City and County of San Francisco, California.

1 Francisco prescriber during this period for Kadian® were Robin Hagy, Shelley Fitch, Debbie Webb, and
2 Adriana Knoblauch, and they made or attempted to make approximately 213 visits to San Francisco
3 prescribers during that period. For further information on those 213 visits or attempted visits, please see
4 the inVentiv call notes produced in this action, at ALLERGAN_MDL_01890663. Allergan has not
5 located any other record of which “marketing materials” were used during these 213 visits or attempted
6 visits, or whether any “marketing materials” were used at all. In certain call notes about visits with
7 prescribers in other locations, the inVentiv call notes reference materials used, but none of the 213 visits
8 or attempted visits to San Francisco prescribers so state, with the possible exceptions of the following
9 entries that appear to contain references to the Kadian® Co-Pay cards: (1) the September 8, 2009 entry
10 relating to health care provider Elliot Stephan Krames includes the following reference: “went over
11 coupon use w/all and advantagesof [sic] ours over others. Said need to remember to use as pts value.”; (2)
12 the September 8, 2009 entry relating to health care provider Masami Hattori includes the following
13 reference: “Talked adv. of k and of k coupon.”; and (3) the September 8, 2009 entry relating to health care
14 provider Claudio Palma contains the following reference: “cards and changed lunch date.” See
15 ALLERGAN_MDL_01890663.
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18 For information on what marketing materials and other materials regarding Kadian® were
19 available for use by inVentiv sales representatives, Allergan refers Plaintiff to documents produced in this
20 matter. Allergan has conducted a reasonable search for Kadian® marketing materials and other materials
21 regarding Kadian® within those documents, including by reviewing Digital Direct invoices relating both
22 to inVentiv sales representatives who made visits or attempted visits in San Francisco and to inVentiv
23 sales representatives who made visits or attempted visits elsewhere in the country. Based on its reasonable
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1 search, Allergan refers Plaintiff to the following materials, which are in addition to Kadian®’s FDA-
 2 approved label provided along with each piece:⁵

<u>Bates Number</u>	<u>Description</u>	<u>Approximate Dates Available</u>
ALLERGAN_MDL_00992370	Kadian® copay card	2012
ALLERGAN_MDL_00992372	Kadian® copay card brochure	2012
ALLERGAN_MDL_00022915	Kadian® conversion guide	2010 - 2012
ALLERGAN_MDL_01290412	Kadian® comparison detailer	2009 - February 2010
ALLERGAN_MDL_01411000	Kadian® dosing guide	2012
ALLERGAN_MDL_01411185 (see also ALLERGAN_MDL_00989136; ALLERGAN_MDL_00989148)	Various, including Kadian® detail aid and dosing guide	2012
ALLERGAN_MDL_01466309	Kadian® journal reprint	November 2009 - February 2010
ALLERGAN_MDL_01466348	Kadian® conversion guide	October 2009 - February 2010
ALLERGAN_MDL_01777325	Kadian® copay card and brochure	Mid-2009 - February 2010
ALLERGAN_MDL_02104539	Kadian® shelf talker	Beginning in January 2011
ALLERGAN_MDL_02104572	Kadian® dosing guide	Beginning in November 2010
ALLERGAN_MDL_02104585	Kadian® detail aid	Beginning in October 2010
ALLERGAN_MDL_02104857	Kadian® sales aid	October 2009 - February 2010

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 27 ⁵ In addition to these materials, one of the Digital Direct invoices reflected an attempt by inVentiv sales representative Robin
 28 Hagy to order a piece identified as KADI7POS01. This piece, though, appears to be an Alpharma piece—and not a piece made
 available to the inVentiv sales representatives with whom Actavis Kadian LLC (a Divested Entity) had contracted—that was
 on “back order[],” and there is no indication that it was shipped to Ms. Hagy. See Acquired_Actavis_00181720.

1	ALLERGAN_MDL_02104947-	Kadian® sales aid	June 2009 - February 2010
2	48		
3	ALLERGAN_MDL_02105199	Kadian® conversion guide	Beginning March 2012
4	(see also		
5	ALLERGAN_MDL_00989157)		
6			
7	ALLERGAN_MDL_02105530	Kadian® shelf talker	Beginning September 2011
8	ALLERGAN_MDL_02105540	Kadian® letter to doctors	Beginning August 2011
9	ALLERGAN_MDL_02105546	Kadian® copay card and	Beginning July 2011
10		brochure	
11			
12	ALLERGAN_MDL_02105693	Letters and mini conversion	Beginning March 2011
13		guide	
14	ALLERGAN_MDL_02105726	Kadian® template managed care	Beginning March 2011
15		formulary status updates	
16	ALLERGAN_MDL_02105779	Kadian® copay card and	Beginning February 2011
17		brochure	
18			
19	ALLERGAN_MDL_02107016	Kadian® tabletop panel	Beginning October 2012
20	ALLERGAN_MDL_02107030	Kadian® new strengths flyer	Beginning September 2012
21	ALLERGAN_MDL_02107034	Kadian® now available flyer	Beginning September 2012
22	ALLERGAN_MDL_02107167	Kadian® pharmacy stocking	Beginning September 2012
23		offer flyer	
24			

25 Allergan has not located any comprehensive record of which marketing materials and other
26 materials regarding Kadian® were used by inVentiv sales representatives with respect to the 213 visits or
27 attempted visits to San Francisco prescribers or otherwise disseminated in San Francisco. For further
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1 information, Allergan refers Plaintiff to the depositions of Ms. Robin Hagy, Ms. Shelley Fitch, and Ms.
2 Adriana Knoblauch in *People of the State of California et al. v. Purdue Pharma L.P., et al.*, No. 30-2014-
3 00725287-CU-BT-CXC. In addition, Allergan refers Plaintiff to Allergan’s production of invoices and
4 related documentation from third-party Digital Direct—through which sales representatives could order
5 marketing materials and other materials, including product availability announcements related to the
6 generic opioid medications—for information on what materials were ordered by various sales
7 representatives. See Acquired_Actavis_00181720 (Robin Hagy); ALLERGAN_MDL_01104919
8 (Debbie Webb); ALLERGAN_MDL_01111684 (Shelley Fitch and Adriana Knoblauch);
9 ALLERGAN_MDL_01267855 (Debbie Webb); ALLERGAN_MDL_01737072 (Robin Hagy);
10 ALLERGAN_MDL_01740690 (Debbie Webb); ALLERGAN_MDL_01196792 (Robin Hagy);
11 ALLERGAN_NY_00039039 (Adriana Knoblauch); ALLERGAN_MDL_01267886 (Adriana Knoblauch
12 and Debbie Webb); ALLERGAN_MDL_01737368 (Debbie Webb); and ALLERGAN_MDL_01741026
13 (Shelley Fitch and Adriana Knoblauch).
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16 Answering further, Allergan states that the sole fact that a marketing material or other material
17 was made available to or ordered by an inVentiv sales representatives or otherwise does not necessarily
18 mean that it was used with a prescriber in San Francisco or elsewhere. It also does not necessarily mean
19 that the sales representative ordered a marketing material or other material for use in San Francisco, given
20 that each sales representative’s territory was broader than San Francisco. Nor, despite having the burden
21 to do so, has Plaintiff identified a single prescriber in San Francisco who received a single inappropriate
22 Kadian® marketing material or other material during any sales visit at any point.
23

24 In addition, Allergan’s counsel has made inquiries with the following inVentiv sales
25 representatives and managers specific to their work with respect to San Francisco, and has learned the
26 following regarding what materials were used (in addition to Kadian®’s FDA-approved label, which was
27 provided along with each piece):
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- **Sales Representative Shelley Fitch:** With respect to San Francisco, Ms. Fitch believes she used Co-Pay Cards themselves (though she does not recall whether she would have included an accompanying brochure with them) and that she most likely used a Conversion Guide (KADI1207 at ALLERGAN_MDL_02105199). She does not recall whether she used in San Francisco two other pieces she ordered, namely KADI1194 at ALLERGAN_MDL_02105271 or KADI1206 at ALLERGAN_MDL_01411000. She also possibly used a “core visual aid,” though she does not recall specifically which document that was, if any.
 - **Sales Representative Adriana Knoblauch:** With respect to San Francisco, Ms. Knoblauch believes it is likely that she left behind Co-Pay Cards (and possibly brochures to which the cards themselves were attached). She also remembers a “Detail Aid”—KADI1005 at ALLERGAN_MDL_02104585—and that it is highly likely that she used it in San Francisco, but she does not remember for sure. She does not recall whether she used any of the other pieces ordered—specifically including A320 - ALLERGAN_MDL_00480175, KADI1006 - ALLERGAN_MDL_00022915, KADI1007 - ALLERGAN_MDL_02104572, KADI1111/1115-1/1115-2/1107 - ALLERGAN_MDL_02105693, KADI1134 - ALLERGAN_MDL_02105530, and KADI1194 - ALLERGAN_MDL_02105271—in San Francisco. Among those, the only one that looked familiar to her was the Conversion Guide, KADI1006 at ALLERGAN_MDL_00022915.
 - **Sales Representative Debbie Webb:** With respect to San Francisco, Ms. Webb recalls using KADI1005 - ALLERGAN_MDL_02104585 and KADI1006 - ALLERGAN_MDL_00022915. She recalls A320 - ALLERGAN_MDL_00480175 and KADI1007 - ALLERGAN_MDL_02104572, but she does not recall whether she used

1 them in San Francisco. Ms. Webb also does not recall whether she used KADI1014 -
2 ALLERGAN_MDL_02104539 or KADI1134 - ALLERGAN_MDL_02105530 in San
3 Francisco, but she does recall showing Co-Pay Cards to prescribers (though not leaving
4 them behind). She does not recall using KADI1111/-1115-1/1115-2/1107 -
5 ALLERGAN_MDL_02105639. For further information, Allergan refers Plaintiff to Ms.
6 Webb's upcoming deposition.
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- 8 • **Sales Manager Mark Killion:** With respect to San Francisco, Mr. Killion believes that
9 one or more sales representatives would have used Co-Pay Cards and probably brochures
10 to which the cards themselves were attached. He is not certain if sales aids were used in
11 San Francisco, or if so which ones.
- 12 • **Sales Manager Chris Hepp:** Mr. Hepp does not recall specifically what materials were
13 used in San Francisco in particular, except that the materials made available generally for
14 use nationwide were also made available for use in San Francisco (though this does not
15 necessarily mean any given piece was in fact used in San Francisco).
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17 Further, Allergan states that based on the information in Allergan's possession, custody, or control,
18 some Divested Entities engaged in limited email messaging regarding Kadian®. For example, it appears
19 that Actavis Inc. n/k/a Actavis LLC (a Divested Entity) contracted with Alert Marketing and Vertical
20 Health Media, LLC and Actavis Kadian LLC (a Divested Entity) contracted with Cardinal Health and
21 MediMedia Information Technologies, LLC to help coordinate email messages regarding Kadian® to
22 pharmacists and prescribers. *See, e.g.,* Acquired_Actavis_00363017; ALLERGAN_MDL_00000042;
23 ALLERGAN_MDL_00015234; ALLERGAN_MDL_00016968; ALLERGAN_MDL_00400620;
24 ALLERGAN_MDL_00406525; ALLERGAN_MDL_01001415; ALLERGAN_MDL_01192443;
25 ALLERGAN_MDL_01196493; ALLERGAN_MDL_01197667; ALLERGAN_MDL_01198262;
26 CAH_MDL2804_02959971. Allergan has conducted a reasonable search of information in its possession,
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1 custody, or control but has not been able to confirm whether such messages were in fact disseminated in
2 San Francisco or to a San Francisco resident.

3 Actavis Kadian LLC (a Divested Entity) also offered copay card and patient assistance programs.
4 Leitch Dep. at 35:3-11. The copay program provided financial assistance for patients when they had their
5 prescriptions filled. Leitch Dep. at 35:20-36:2. The copay program was administered by a third party
6 called Triple i, which was retained by Actavis Kadian LLC (a Divested Entity), and included sending
7 copay cards and information regarding the copay program to prescribers and making a printable version
8 of the copay card available online. ALLERGAN_MDL_01891508. Copay cards were redeemed in San
9 Francisco, according to “Copay Utilization Reports” available in Allergan’s production. See
10 ALLERGAN_MDL_00399868 (Jan. to Aug. 2011 copay utilization report);
11 ALLERGAN_MDL_00399873 (Jan. to Aug. 2011 copay utilization report in San Francisco sales
12 territory); ALLERGAN_MDL_00399919 (Jan. to Aug. 2011 copay utilization report);
13 ALLERGAN_MDL_00401388 (Jan. to June 2011 copay utilization report);
14 ALLERGAN_MDL_00401393 (Jan. to June 2011 copay utilization report in San Francisco sales
15 territory); ALLERGAN_MDL_00401543 (Jan. to June 2011 copay utilization report in San Francisco
16 sales territory); ALLERGAN_MDL_00401589 (Jan. to June 2011 copay utilization report);
17 ALLERGAN_MDL_00401590 (Jan. to June 2011 copay utilization report);
18 ALLERGAN_MDL_00419925 (Jan. to Sept. 2011 copay utilization report in San Francisco sales
19 territory); ALLERGAN_MDL_00419971 (Jan. to Sept. 2011 copay utilization report).

20 Actavis Kadian LLC (a Divested Entity) also contracted with a company called “Adheris”
21 regarding a patient adherence program, beginning in August 1, 2009. ALLERGAN_MDL_01890807.
22 The program involved sending an average of three letters to Kadian® patients (which appear in
23 ALLERGAN_MDL_01890807) that included, for example, information “reinforc[ing] the importance of
24 discussing treatment with the patient's physician.” ALLERGAN_MDL_00450170; Leitch Dep. at 54:8-
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1 17. This program appears to have included San Francisco, ALLERGAN_MDL_01890807, and Allergan
2 has conducted a reasonable search but has not been able to confirm which if any messages in particular
3 were in fact disseminated in San Francisco.

4 Answering further, Allergan states that based on a reasonable search of the information in
5 Allergan's possession, custody, or control, it appears that Divested Entities had limited product
6 availability announcement materials regarding certain generic opioid medications that those entities
7 sold. These materials include product availability announcements regarding generic opioid medications
8 sold by Watson Laboratories, Inc. (a Divested Entity) and/or related entities (also Divested Entities) prior
9 to 2013. Allergan has conducted a reasonable search for such materials produced in this matter and refers
10 Plaintiff to the following:

<u>Bates Number</u>	<u>Medication</u>	<u>Approximate Dates Available</u>
Acquired_Actavis_01180384	Generic oxycodone/APAP	Beginning March 2001
Acquired_Actavis_02049540	Generic oxycodone/APAP	Beginning January 2001
ALLERGAN_SF_00058943	Generic oxycodone/APAP	Beginning March 2001
ALLERGAN_MDL_03738897	Generic hydrocodone and acetaminophen	Beginning June 2000
ALLERGAN_SF_00058940	Generic oxycodone/APAP	Beginning March 2001
ALLERGAN_MDL_01144537	Generic oral transmucosal fentanyl citrate	Beginning September 2006
ALLERGAN_MDL_01683855	Generic hydrocodone and acetaminophen	Beginning March 2003

1 They also include product availability announcements regarding generic opioid medications sold
2 by other Divested Entities, namely those affiliated with Divested Entity Actavis Inc. (n/k/a Actavis LLC),
3 prior to 2016:
4

<u>Bates Number</u>	<u>Medication</u>	<u>Approximate Dates Available</u>
5 ALLERGAN_MDL_00479727	6 Generic fentanyl transdermal 7 system announcement	Beginning July 2010 (draft)
8 ALLERGAN_MDL_00504756	Generic oxymorphone	Beginning June 2011
9 Acquired_Actavis_00612507	Generic oxycodone	Unknown
10 ALLERGAN_MDL_00480175	Generic oxymorphone	Beginning June 2011
11 ALLERGAN_MDL_02105256	Generic morphine sulfate ER	Beginning March 2012
12 ALLERGAN_MDL_02105271	Generic morphine sulfate ER	Beginning December 2011
13 ALLERGAN_MDL_03998259	Generic oxycodone	Beginning November 2009

15 Upon information and belief, the content of some of these product availability announcements
16 regarding generic oxymorphone sold by Divested Entities affiliated with Divested Entity Actavis Inc.
17 (n/k/a Actavis LLC) was planned to be distributed via email. See ALLERGAN_MDL_00401025;
18 ALLERGAN_MDL_00401500; ALLERGAN_MDL_00480175; ALLERGAN_MDL_00492055;
19 ALLERGAN_MDL_00492064; ALLERGAN_MDL_00508576; and ALLERGAN_MDL_00508579.
20 Upon information and belief, it appears that at least some of these generic oxymorphone announcements
21 were planned to be disseminated to persons in San Francisco. ALLERGAN_MDL_00492063. Allergan
22 has conducted a reasonable search of information in its possession, custody, or control but has not been
23 able to confirm whether such availability announcements were in fact disseminated in San Francisco or to
24 a San Francisco resident. For further information regarding the generic opioids sold by the Divested
25 Entities, Allergan directs Plaintiff to Exhibit 65 from Julie Snyder's PMK Deposition of February 4, 2020,
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1 *People of the State of California et al. v. Purdue Pharma L.P., et al.*, No. 30-2014-00725287-CU-BT-
2 CXC. Finally, Allergan states that Requests related to generic opioid medications sold by Divested
3 Entities are more appropriately directed to the Actavis Generics Defendants.

4 **INTERROGATORY NO. 2:** For each document you identified in response to Interrogatory No.
5 1, identify: (a) the number of times it was disseminated or caused to be disseminated in or otherwise
6 directed to San Francisco or its residents; (b) the number of persons, health care providers, pharmacies,
7 group purchasing organizations, pharmacy benefit managers, direct customers or downstream customers
8 to whom it was disseminated or caused to be disseminated in or otherwise directed to San Francisco or its
9 residents; and (c) the dates of dissemination.

10 **SEPTEMBER 13, 2021 SECOND AMENDED AND SUPPLEMENTAL RESPONSE TO**
11 **INTERROGATORY NO. 2:** Allergan incorporates by reference the General Objections, Objections to
12 Instructions, and Objections to Definitions. Allergan further objects to the extent this Interrogatory is not
13 limited to Kadian® and Norco® as overly broad, unduly burdensome, as calling for irrelevant information,
14 and as not proportional to the needs of the case.

15 Subject to and without waiving its objections, and subject to further investigation, discovery and
16 proceedings in this matter, Allergan answers as follows:

17 Allergan states that none of the Allergan entities marketed opioids in San Francisco, in California
18 or elsewhere. As such, it has not “disseminated or caused to be disseminated” any “marketing materials”
19 anywhere.

20 Allergan directs Plaintiff to its Response to Interrogatory 1 for information responsive to this
21 Interrogatory.

22 Allergan further states that to obtain copies of the Kadian® marketing materials and other materials
23 related to Kadian® identified in Interrogatory No. 1, Actavis Kadian LLC (a Divested Entity) provided
24 inVentiv sales representatives a username and password for a third-party website
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1 (fulfull.digitaldirect.com) from which they could order the majority of the Kadian® materials as
2 needed. *See* ALLERGAN_MDL_00026871; *see also* Knoblauch Nov. 14, 2019 Dep. 95:25-4 (“I believe
3 I ordered them. I don’t believe they ever sent me a lot of stuff.”). Those materials would then be shipped
4 directly from the warehouse to the inVentiv sales representative. However, the inVentiv sales
5 representatives had to request Kadian® co-pay cards through their respective supervisor at inVentiv. The
6 inVentiv sales representatives had storage units where they could store these materials and use them in
7 sales visits with prescribers at their discretion. *See* Synder June 13, 2019 PMK Dep. 223:22-225:9. As
8 requested by Plaintiff, Allergan further states that it asked counsel for inVentiv whether in its work under
9 its contract with Actavis Kadian LLC (a Divested Entity) it had any “materials drop” files that might
10 provide information about which Kadian® materials (if any) were provided to individuals in San Francisco
11 by the inVentiv sales representatives, and inVentiv’s counsel stated that it has located no such files.

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14 **INTERROGATORY NO. 3:** Identify by Bates number all documents reflecting statements you
15 disseminated or caused to be disseminated in any publication, including, but not limited to, newspapers,
16 the Internet, magazines and medical journals, in San Francisco or to a resident regarding prescription
17 opioids. If you are unable to verify that a statement was made in San Francisco or to its residents, but also
18 cannot confirm that it was not, then please identify those documents as well.

19
20 **SEPTEMBER 13, 2021 SECOND AMENDED AND SUPPLEMENTAL RESPONSE TO**
21 **INTERROGATORY NO. 3:** Allergan incorporates by reference the General Objections, Objections to
22 Instructions, and Objections to Definitions. Allergan further objects to this Interrogatory as overbroad
23 and lacking proportionality. Allergan also objects to the extent this Interrogatory is not limited to Kadian®
24 and Norco® as overly broad, unduly burdensome, as calling for irrelevant information, and as not
25 proportional to the needs of the case. In addition, Allergan objects to the term “publications” as vague
26 and ambiguous in this context; to resolve that ambiguity, and solely for purposes of these Interrogatories,
27 Allergan has interpreted it to mean marketing materials published in magazines, on the Internet, and in
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1 newspapers as distinguished from marketing materials provided to prescribers. Allergan further objects to
2 the extent that Plaintiff appears to be asking for statements that Allergan “cannot confirm . . . was not”
3 “made in San Francisco or to its residents” as ambiguous, vague, irrelevant, not proportional, and as an
4 impermissible attempt to shift the burden of proof from Plaintiff to Allergan.

5 Subject to and without waiving its objections, and subject to further investigation, discovery and
6 proceedings in this matter, Allergan answers as follows:
7

8 Allergan states that none of the Allergan entities marketed opioids in San Francisco, in California
9 or elsewhere. As such, it has not “disseminated or caused to be disseminated” any “statements . . . in any
10 publication” anywhere.

11 Answering further, Allergan states that none of the Divested Entities involved with the limited
12 marketing of Kadian® that occurred between 2009 and 2013 published or caused to be published any
13 “publication...in San Francisco” with respect to Kadian®. On information and belief, Allergan further
14 states that before Actavis Elizabeth LLC (a Divested Entity) acquired Kadian® on December 30, 2008
15 from King Pharmaceuticals, Inc. (a separate, independent entity that was never affiliated in any manner
16 with Allergan), Kadian®’s prior owner, Alpharma (which was also a separate, independent entity that was
17 never affiliated in any manner with Allergan), ran the website with the domain name “www.kadian.com,”
18 and another third-party company, Catalyst, maintained that website for Alpharma.⁶ In connection with
19 the sale of Kadian®, Alpharma (which had been acquired by King Pharmaceuticals at that time) assigned
20 its contract with Catalyst to Actavis Elizabeth LLC (a Divested Entity). See
21 ALLERGAN_MDL_01415951. Actavis Elizabeth LLC (a Divested Entity) used Catalyst to maintain the
22 website after its acquisition of Kadian® and to update the website to remove Alpharma’s content before
23
24

25
26 ⁶ Kadian® was marketed and sold by entities unaffiliated with Allergan, including Alpharma, Inc., from 1996 through 2008.
27 On November 23, 2008, Alpharma entered a definitive merger agreement to be acquired by King Pharmaceuticals, Inc. Before
28 approving this merger, the FTC required the combined entity to divest Kadian® due to competition concerns. One of the
Divested Entities, Actavis Elizabeth LLC, purchased Kadian® from King in an Asset Purchase Agreement in which Alpharma
and King (now Pfizer) expressly retained all liability for Alpharma’s pre-sale conduct with respect to Kadian®.

1 2009, except for a link to the medication’s FDA-approved full prescribing information, information on
2 copay cards, a registration page for copay cards, and a list of frequently asked questions about
3 Kadian®. Immediately after receipt of a warning letter from the FDA in February 2010, Actavis Elizabeth
4 LLC (a Divested Entity) removed all content from the www.kadian.com website other than a message
5 saying that the website was under construction and a link to the medication’s FDA-approved full
6 prescribing information.
7

8 In approximately September 2010, Actavis Elizabeth LLC (a Divested Entity) transitioned
9 maintenance of the website from Catalyst to itself and updated the website’s content with Z&J
10 Advertising’s assistance in design. *See* Acquired_Actavis_00181253; ALLERGAN_MDL_01194734;
11 ALLERGAN_MDL_01740071. The revised www.kadian.com website contained only basic information
12 about Kadian®, including robust risk disclosures and safety warnings. Specifically, the website displayed
13 the Kadian® indication, boxed warning, important safety information, the medication’s FDA-approved
14 full prescribing information, and a registration page for patients wishing to receive a copay card. *See*,
15 *e.g.*, ALLERGAN_MDL_02104599, ALLERGAN_MDL_02104602, ALLERGAN_MDL_02104615,
16 ALLERGAN_MDL_02104617, ALLERGAN_MDL_02104641, ALLERGAN_MDL_02104643,
17 ALLERGAN_MDL_02104645, ALLERGAN_MDL_02104650. ALLERGAN_MDL_02104653.
18

19 In approximately January 2013, Actavis Elizabeth LLC (a Divested Entity) updated the
20 www.kadian.com website again, after which it displayed the Kadian® indication, boxed warning and
21 important safety information, the medication’s FDA-approved full prescribing information, dosage
22 strengths, and information about the FDA’s Extended-Release and Long-Acting Opioid Analgesics REMS
23 program. *See* ALLERGAN_MDL_00063297. Starting around October 2015, the only information on the
24 www.kadian.com website was a link to the medication’s FDA-approved full prescribing information,
25 which is how the website remained until it was taken down completely in approximately 2019.
26
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1 Regarding the generic opioid medications sold by Divested Entities, Allergan states that, based on
2 the information in Allergan’s possession, custody, or control, it appears Divested Entities did not market
3 the safety or efficacy of generic opioid medications; rather, Divested Entities had materials with pricing
4 information and/or materials announcing the availability for certain generic opioid medications. Pursuant
5 to inVentiv’s contract with Actavis Kadian LLC (a Divested Entity), inVentiv sales representatives may
6 have conveyed pricing and availability information regarding generic oxymorphone between July 2011
7 and December 2012 and generic Kadian® between November 2011 and December 2012.

9 Allergan further states, on information and belief, that Divested Entities appear to have placed
10 general corporate advertisements (not related to any specific product)—an example of which is found at
11 ALLERGAN_MDL_01480883—in the following periodicals: American Health and Drug Benefits, Chain
12 Drug Review, Chain Drug Review, Chain Drug Store Daily - NACDS, Drug Store Management, Drug
13 Store News, Drug Topics, GMDC Membership Directory, MPR, Non-Foods Management, Pharmacy
14 Purchasing and Products, Pharmacy Times, Pharmacy Today, Practical Pain Management, and U.S.
15 Pharmacist. ALLERGAN_MDL_00401500, ALLERGAN_MDL_00479902,
16 ALLERGAN_MDL_00479904, J. McCormick Dep., 274:22–275:21, D. Boothe Dep., 152:16–154:1,
17 231:23–233:6, 234:17–235:2. In addition, on information and belief, Actavis LLC f/k/a Actavis Inc. (a
18 Divested Entity) appears to have placed a product availability announcement regarding generic
19 oxymorphone—located at ALLERGAN_MDL_00480175—in Practical Pain Management and Pharmacy
20 Times. ALLERGAN_MDL_00479902, ALLERGAN_MDL_00479904. Finally, on information and
21 belief, a Divested Entity appears to have placed a product availability announcement regarding generic
22 fentanyl—a draft version of which is located at ALLERGAN_MDL_02053315—in Chain Drug Review
23 (ALLERGAN_MDL_00479902, ALLERGAN_MDL_00479904), and possibly considered placing this
24 announcement in Drug Store News (ALLERGAN_MDL_01235205, ALLERGAN_MDL_02053309,
25 ALLERGAN_MDL_02053315).

1 For further information, Allergan refers Plaintiff to documents regarding the Divested Entities’
2 “media schedules,” including the following: Acquired_Actavis_00612289 (2009 media schedule);
3 Acquired_Actavis_00614248 (9/21/2010 media schedule); Acquired_Actavis_00624240 (8/18/2010
4 media schedule); Acquired_Actavis_00626184 (June 2007 media plan); Acquired_Actavis_00628142
5 (9/17/2010 media schedule); Acquired_Actavis_01061260 (11/8/2010 media schedule);
6 Acquired_Actavis_01061383 (8/16/2011 media schedule); Acquired_Actavis_01061385 (9/9/2011 media
7 schedule); Acquired_Actavis_01061626 (7/24/2012 media schedule); Acquired_Actavis_01061676
8 (11/28/2011 media schedule); Acquired_Actavis_01061719 (9/13/2012 media schedule);
9 Acquired_Actavis_01061783 (12/20/2011 media schedule); Acquired_Actavis_01062042 (3/9/2012
10 media schedule); Acquired_Actavis_01062059 (2/14/2012 media schedule);
11 Acquired_Actavis_01062083 (4/10/2012 media schedule); Acquired_Actavis_01062906 (8/7/2012 media
12 schedule); Acquired_Actavis_01375125 (8/16/2010 media schedule); ALLERGAN_MDL_00492078
13 (6/7/2011 media schedule); ALLERGAN_MDL_00493445 (9/2/2011 oxymorphone marketing plan);
14 ALLERGAN_MDL_00499047 (9/2/2011 media schedule); ALLERGAN_MDL_00500046 (5/27/2011
15 media schedule); ALLERGAN_MDL_00506954 (7/31/2012 media schedule);
16 ALLERGAN_MDL_00506967 (7/19/2012 media schedule); ALLERGAN_MDL_00507021 (5/17/2012
17 media schedule); ALLERGAN_MDL_00507046 (3/21/2012 media schedule);
18 ALLERGAN_MDL_00507109 (3/8/2012 media schedule); ALLERGAN_MDL_00507135 (12/2/2011
19 media schedule); ALLERGAN_MDL_00507408 (7/26/2011 media schedule);
20 ALLERGAN_MDL_00507439 (7/18/2011 media schedule); ALLERGAN_MDL_00507550 (6/22/2011
21 media schedule); ALLERGAN_MDL_00507600 (4/8/2011 media schedule);
22 ALLERGAN_MDL_00507603 (4/4/2011 media schedule); ALLERGAN_MDL_00507612 (3/23/2011
23 media schedule); ALLERGAN_MDL_00507649 (3/16/2011 media schedule);
24 ALLERGAN_MDL_00507652 (3/11/2011 media schedule); ALLERGAN_MDL_00507677 (2/18/2011
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1 media schedule); ALLERGAN_MDL_00507682 (2/9/2011 media schedule);
2 ALLERGAN_MDL_00508579 (8/19/2011 oxymorphone promotional plan);
3 ALLERGAN_MDL_00509467 (2009 media schedule); ALLERGAN_MDL_01214281 (2010 media
4 schedule).

5
6 Answering further, Allergan states that, based on the information in Allergan's possession,
7 custody, or control, it appears that Divested Entities maintained websites related to generic opioid
8 medications that they sold. The websites included the full prescribing information for the medication,
9 along with product-specific information, including the NDC number, brand equivalent, and
10 description. *See, e.g.,* ALLERGAN_MDL_04387590; Acquired_Actavis_00627005. The following
11 appear to be the URLs/names of those websites, based on information in Allergan's possession, custody
12 or control:

- 13
- 14 • <http://www.actavis.us/en/products/new.htm>
- 15 • <http://www.actavis.us/en/default.htm>
- 16 • http://www.actavis.us/en/Fentanyl_Recall.htm
- 17 • http://www.actavis.us/en/Fentanyl_recall_FAQ.htm
- 18 • <http://www.actavis.us/en/morphinesulfate.htm>
- 19 • http://www.actavis.us/en/news/Fentanyl_Recall_Consumer.htm
- 20 • http://www.actavis.us/en/news/Fentanyl_Recall_Press_Release.htm
- 21 • http://www.actavis.us/en/news/Morphine_Sulfate_launch.htm
- 22 • http://www.actavis.us/en/news/Oxymorphone_launch.htm
- 23 • <http://www.actavis.us/en/oxymorphone.htm>
- 24 • <http://www.actavis.us/en/products/group.htm?name=Fentanyl+Transdermal+System+CII>
- 25 • <http://www.actavis.us/en/products/group.htm?name=Oxycodone+Hydrochloride+Tablets>
- 26
- 27
- 28 ,+USP+CII

- 1 • <http://www.actavis.us/en/products/group.htm?name=Oxycodone+Hydrochloride+and+Ibuprofen+Tablets+CII>
- 2
- 3 • <http://www.actavis.us/en/products/group.htm?name=Oxycodone%20Hydrochloride%20Tablets,%20OUSP%20CII>
- 4
- 5 • <http://www.actavis.us/en/products/group.htm?name=Oxycodone%20Hydrochloride%20Tablets,%20OUSP%20CII>
- 6
- 7 • <http://www.actavis.us/en/products/group.htm?name=Oxycodone%20Hydrochloride%20Extended-Release%20Tablets%20CII>
- 8
- 9 • <http://www.actavis.us/en/products/group.htm?name=Oxycodone%20Hydrochloride%20Extended-Release%20Tablets%20CII>
- 10
- 11 • <http://www.actavis.us/en/products/new.htm>
- 12 • <http://www.actavis.us/en/products/product+list/fentanyl.htm>
- 13 • <http://www.actavis.us/en/products/product+list/Oxycodone+HCl+Tablet+15mg.htm>
- 14 • http://www.actavis.us/en/products/Products_US.htm
- 15 • <http://www.actavis.us/en/sitemap>
- 16 • <http://www.actavis.us/Oxycodone>
- 17 • <http://www.actavis.us/oxycodone>
- 18 • <http://www.actavis.us/oxycodone>
- 19 • <http://www.actavis.us/oxycodone.htm>
- 20 • <http://www.watson.com/>
- 21 • <http://www.watson.com/products/product-database.asp>
- 22 • <http://www.watson.com/products/product-database-detail.asp>
- 23 • <http://www.watson.com/products/product-database-detail.asp?group=generic&c=Rx>⁷
- 24
- 25
- 26

27 ⁷ Answering further, Allergan states that ALLERGAN_MDL_01235077, ALLERGAN_MDL_01235154, and ALLERGAN_MDL_01235164 contain incomplete or abbreviated URLs that accordingly do not appear in the list above. Allergan directs Plaintiff to these documents for further information.

28

1 Upon information and belief, an updated version of the www.actavis.us domain was launched in
2 the Spring of 2011. See ALLERGAN_MDL_00486750; McCormick Dep. 89:3-20. Based on a
3 reasonable search, Allergan has not been able to determine any further information about when this
4 website domain was operated.⁸ Finally, Allergan states that Requests related to generic opioid
5 medications sold by Divested Entities are more appropriately directed to the Actavis Generics Defendants.
6

7 **INTERROGATORY NO. 4:** For each document you identified in response to Interrogatory No.
8 3, identify: (a) the number of times you published or caused the statement to be published in San Francisco
9 or where such publication was directed to a resident; (b) the medium in which it was published; (c) the
10 number of residents the publication reached, whether actual or estimated; (d) any statements that you
11 cannot confirm or deny were disseminated in San Francisco or to a resident; and (e) date(s) of publication.
12

13 **SEPTEMBER 13, 2021 SECOND AMENDED AND SUPPLEMENTAL RESPONSE TO**
14 **INTERROGATORY NO. 4:** Allergan incorporates by reference the General Objections, Objections to
15 Instructions, and Objections to Definitions. Allergan further objects to the extent that Plaintiff appears to
16 be asking for statements that Allergan “cannot confirm or deny were disseminated in San Francisco or to
17 a resident” as ambiguous, vague, irrelevant, not proportional and as an impermissible attempt to shift the
18 burden of proof from Plaintiff to Allergan. Allergan also objects to the extent this Interrogatory is not
19 limited to Kadian® and Norco® as overly broad, unduly burdensome, as calling for irrelevant information,
20 and as not proportional to the needs of the case. Further, Allergan objects to the number of discrete
21 subparts of this Interrogatory as not proportional to the needs of the case and a failure to comply with the
22 limit on the number of interrogatories a party may serve absent leave of court.
23
24
25

26 _____
27 ⁸ Internet searches performed as of the date of these Responses do not reveal an active website at the www.actavis.us
28 domain. The publically available and free-of-charge resource “The Wayback Machine,” which is equally available to Plaintiff,
last saved a “snapshot” of <http://actavis.us> on February 20, 2020. That “snapshot” of <http://actavis.us> redirects to
<https://www.tevausa.com/>. See https://web.archive.org/web/2020*/http://actavis.us.

1 Subject to and without waiving its objections, and subject to further investigation, discovery and
2 proceedings in this matter, Allergan answers as follows:

3 Allergan states that none of the Allergan entities marketed opioids in San Francisco, in California
4 or elsewhere. As such, it has not “disseminated or caused to be disseminated” any “statements ... in any
5 publication” anywhere.
6

7 Allergan directs Plaintiff to its Response to Interrogatory 3 for information responsive to this
8 Interrogatory.

9 Answering further, Allergan states that given the information to which it has access, Allergan
10 cannot confirm or deny whether there was traffic to the www.kadian.com website in San Francisco or
11 involving a San Francisco resident. Allergan has identified no information showing whether visits to the
12 www.kadian.com website originated from San Francisco. Allergan has conducted a reasonable search
13 regarding online traffic to the www.kadian.com website. While Allergan has identified several documents
14 reflecting monthly visits to that website (*see, e.g.,* ALLERGAN_MDL_01898134,
15 Acquired_Actavis_00370687, ALLERGAN_MDL_01101331, ALLERGAN_MDL_01101332,
16 ALLERGAN_MDL_00498709, ALLERGAN_MDL_00498710), this information regarding website
17 traffic does not indicate whether and to what extent hits to that website originated from San
18 Francisco. Following an additional reasonable search, Allergan has not been able to identify any
19 information regarding the geographic location of visitors to the www.kadian.com website.
20
21

22 As requested by Plaintiff, Allergan asked counsel for inVentiv whether inVentiv ever hosted the
23 www.kadian.com website and whether it has any information regarding whether and to what extent hits
24 to that website originated from San Francisco. In response, inVentiv’s counsel stated that it has no
25 indication that inVentiv ever hosted the www.kadian.com website.

26 Answering further, based on the information in Allergan’s possession, custody, or control, it
27 appears that Divested Entities (namely, through David Myers) received information from Nordic
28

1 eMarketing about hits for Divested Entities’ websites related to generic opioids. *See, e.g.,*
2 ALLERGAN_MDL_01235077, ALLERGAN_MDL_01235154, ALLERGAN_MDL_01235164. There
3 are more than a hundred of these reports in the documents produced to Plaintiff, which can be identified
4 by the email address from which they were sent, i.e., support.nordicemarketing.com. It appears that the
5 information from Nordic eMarketing included page views for the separate Divested Entities’ webpages
6 related to specific generic opioid products as part of periodic reports of traffic to the general
7 www.actavis.us website. These reports often include information regarding the location of website
8 visitors, but this location-specific information appears to be for the www.actavis.us website, as opposed
9 to product-specific webpages. The reports also include a disclaimer noting that there are limits on the
10 accuracy of this location-specific information. *See, e.g.,* Acquired_Actavis_00385137,
11 Acquired_Actavis_00385190. Finally, Allergan states that Requests related to generic opioid medications
12 sold by Divested Entities are more appropriately directed to the Actavis Generics Defendants.
13
14

15 **INTERROGATORY NO. 5:** Please identify by Bates number any marketing materials used to
16 promote your opioids that were not used nationwide (i.e., any materials that were distributed in a limited
17 geographical subsection of the United States); and, for each such document, please identify in which
18 geographical subsections of the United States it was not used.
19

20 **SEPTEMBER 13, 2021 SECOND AMENDED AND SUPPLEMENTAL RESPONSE TO**
21 **INTERROGATORY NO. 5:** Allergan incorporates by reference the General Objections, Objections to
22 Instructions, and Objections to Definitions. Allergan further objects to the extent this Interrogatory
23 purports to call for Allergan to “for each such document, please identify in which geographical subsections
24 of the United States it was not used” as vague, ambiguous, and confusing. Allergan also objects to the
25 extent this Interrogatory is not limited to Kadian® and Norco® as overly broad, unduly burdensome, as
26 calling for irrelevant information, and as not proportional to the needs of the case.
27
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1 Subject to and without waiving its objections, and subject to further investigation, discovery and
2 proceedings in this matter, Allergan answers as follows:

3 Allergan states that none of the Allergan entities marketed opioids in San Francisco, in California
4 or elsewhere.

5 Answering further, Allergan states that the sole fact that a marketing material or other material
6 was made available to inVentiv sales representatives (retained by Divested Entity Actavis Kadian LLC)
7 does not necessarily mean that it was used with a prescriber in San Francisco. Nor, despite having the
8 burden to do so, has Plaintiff identified a single prescriber in San Francisco who received a single
9 inappropriate Kadian® marketing material or other material during any sales visit at any point.
10

11 Kadian® marketing materials and other materials regarding Kadian® were generally made
12 available for use by Divested Entities nationwide; this does not necessarily mean that they were actually
13 used, much less in any given geographic location. The only regional-specific materials Allergan has
14 identified to date are related to “FormTrak On Demand.” Pursuant to a contract with Actavis Kadian LLC
15 (a Divested Entity), MediMedia Information Technologies, LLC administered the “FormTrak On
16 Demand” program. This program provided sales representatives with regional information about
17 formulary placement for Kadian® that could be provided to health care providers. *See*
18 ALLERGAN_MDL_00990339 (presentation explaining the “FormTrak On Demand” program).
19 ALLERGAN_MDL_00990356, the eighteenth page of the document beginning on
20 ALLERGAN_MDL_00990339, describes a process for the review and approval of these cards. Allergan
21 has conducted a reasonable search and has been unable to locate any such cards generated for Robin Hagy,
22 Shelley Fitch, Debbie Webb, or Adriana Knoblauch. Allergan has located the following “card” showing
23 Kadian® formulary coverage in California, ALLERGAN_MDL_02522878, but Allergan has conducted
24 a reasonable search and has not been able to confirm if this card was in fact disseminated in San Francisco.
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1 Based on the information in Allergan's possession, custody, or control, it appears that Divested
2 Entities had limited availability announcements related to certain generic opioid medications. For further
3 information regarding the generic opioids sold by the Divested Entities, Allergan also directs Plaintiff to
4 Exhibit 65 from Julie Snyder's PMK Deposition of February 4, 2020, *People of the State of California et*
5 *al. v. Purdue Pharma L.P., et al.*, No. 30-2014-00725287-CU-BT-CXC. Allergan states that after an
6 additional reasonable search of information in its possession, custody, or control, Allergan has not
7 identified any information indicating which, if any, of the separate Divested Entities' limited availability
8 announcements related to certain generic opioid medications were region-specific. Finally, Allergan
9 states that Requests related to generic opioid medications sold by Divested Entities are more appropriately
10 directed to the Actavis Generics Defendants.

11
12 **INTERROGATORY NO. 7:** Please identify each suspicious order arising out of the State of
13 California that you reported to any regulatory body, including the DEA and/or the California State Board
14 of Pharmacy, and please identify the Bates numbers or otherwise the documents that correspond to or
15 concern each suspicious order, including any data, investigation files, reports and communications so that
16 a jury may correlate each suspicious order in your written answer to its relevant documents.

17
18 **JUNE 28, 2021 AMENDED AND SUPPLEMENTAL RESPONSE TO INTERROGATORY**
19 **NO. 7:** Allergan incorporates by reference the General Objections, Objections to Instructions, and
20 Objections to Definitions. Allergan objects to the extent this Interrogatory is not limited to opioids as
21 irrelevant and unduly burdensome. Allergan also objects to the extent this Interrogatory is not limited to
22 Kadian® and Norco® as overly broad, unduly burdensome, as calling for irrelevant information, and as
23 not proportional to the needs of the case. In addition, Allergan objects to this Interrogatory as overly
24 burdensome to the extent it asks Allergan to summarize documents and data that Allergan has previously
25 produced. Allergan further objects to the extent that Plaintiff appears to be asking for statements that
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1 Allergan “identify each suspicious order” and “identify the Bates numbers...concern[ing] suspicious
2 orders” as an impermissible attempt to shift the burden of proof from Plaintiff to Allergan.

3 Subject to and without waiving its objections, and subject to further investigation, discovery and
4 proceedings in this matter, Allergan answers as follows:

5 Allergan states that none of the Allergan entities manufactured or distributed opioids in San
6 Francisco, in California or elsewhere.

7 Answering further, Allergan states that none of the Allergan entities is or ever has been a DEA
8 registrant for the manufacture or distribution of Schedule II controlled substances. Divested Entities that
9 were DEA registrants employed suspicious order monitoring programs to monitor for potential suspicious
10 orders of Kadian® and Norco®. Upon determining that any orders were suspicious within the meaning
11 of 21 C.F.R. 1301.74(b), the Divested Entities that were DEA registrants reported those orders to the DEA.
12

13 Answering further, on information and belief, Allergan states that Divested Entities that were DEA
14 registrants employed suspicious order monitoring programs to monitor for potential suspicious orders of
15 generic opioid medications sold by Divested Entities. The following information about suspicious orders
16 and customers that were reported to the DEA by Divested Entities that were DEA registrants. Allergan
17 has identified four orders that were reported to the DEA by Divested Entities as suspicious. One of the
18 suspicious orders that was reported to the DEA was connected to California: the TopRx, Inc. order,
19 described below. Nonetheless, Allergan is providing information about other suspicious orders and
20 customers that were reported to the DEA by Divested Entities that were DEA registrants without a
21 geographical or product limitation.
22

23
24 1. TopRx, Inc.

25 Investigation reports by Divested Entities detailing the suspicious order investigations and
26 subsequent actions related to TopRX, Inc. can be found at ALLERGAN_MDL_02187198,
27 ALLERGAN_MDL_02187201, and ALLERGAN_MDL_02467197. These documents discuss nine
28

1 orders that were cancelled for TOP RX, and they indicate that the Divested Entities' DEA Affairs team
2 "determined TOP RX's orders to be suspicious and in accordance with federal regulation, must report
3 these suspicious orders to the DEA." ALLERGAN_MDL_02187198. Additionally, the Divested Entities'
4 DEA Affairs team "canceled pending orders" and Watson "agreed to discontinue all sales of controlled
5 substances to TopRX." ALLERGAN_MDL_02467197. The Divested Entities' investigation summaries
6 also contain investigative findings about Dr. Christopher J. Fisher, MD and Buena Vista Pharmacy.
7 ALLERGAN_MDL_02187198. Tom Napoli testified in the MDL that he personally remembers reporting
8 TopRX to the DEA and "providing all this information [from the investigation summary] to the DEA" --
9 specifically, to Tim Lenzi in the Chicago Field Office. *See* Napoli MDL Dep. 260:3-261:19; 340:15-21.
10

11 2. Capital Wholesale Drug Co.

12 Investigation reports by Divested Entities detailing the suspicious order investigations and
13 subsequent actions related to Capital Wholesale Drug Co. can be found at ALLERGAN_MDL_02187195
14 and ALLERGAN_MDL_03765743. These documents indicate that the order at issue was an October 24,
15 2012 order for 48 units of Hydrocodone/APAP 10/650 mg (NDC 00591050301; Order # 580581).
16 ALLERGAN_MDL_02187195. Divested Entities' DEA Affairs "determined Capital's order to be
17 suspicious and in accordance with federal regulation, must report suspicious orders to the DEA." *Id.*
18 Further, Divested Entities' DEA Affairs recommended "discontinuing sales of controlled substances to
19 Capital." *Id.* Tom Napoli testified in the MDL that he personally remembers reporting Capital Wholesale
20 Drug Co. to the DEA -- specifically, Tim Lenzi in the Chicago Field Office. *See* Napoli MDL Dep. 339:3-
21 14; 340:22-341:5.
22
23

24 3. R & S Northeast / Dixon Shane Drug Company

25 Investigation reports by Divested Entities detailing the suspicious order investigations and
26 subsequent actions related to R & S Northeast, LLC (ship-to party Dixon-Shane Drug Company) can be
27 found at ALLERGAN_MDL_02176521, ALLERGAN_MDL_02176522,
28

1 ALLERGAN_MDL_03356576, and ALLERGAN_MDL_03912159. The order at issue was a July 20,
2 2010 order for thirty-six 100-count bottles of Hydrocodone/Apap 10/325 mg and twenty-four 100-count
3 bottles of Hydrocodone/APAP 5/325 mg. ALLERGAN_MDL_02176521;
4 ALLERGAN_MDL_03356576; ALLERGAN_MDL_03912159. The sold-to party, R & S Northeast
5 LLC, was located at 6059 Frantz Road, Dublin, Ohio, and the ship-to party, Dixon-Shane LLC, was
6 located at 10049 Sandmeyer Lane, Philadelphia, Pennsylvania. ALLERGAN_MDL_03912159. When the
7 Divested Entities' DEA Affairs requested justification for the order, R & S Northeast stated that "a new
8 customer came on board -- Palm Beach Pain & Rejuvenation." ALLERGAN_MDL_02176521. Upon
9 researching Palm Beach Pain & Rejuvenation, the Divested Entities' DEA Affairs team "concluded that
10 the order was suspicious and agreed to cancel R & S Northeast's July 20th Hydrocodone order." *Id.* The
11 order was reported to the DEA, as indicated within subsequent meeting minutes stating that a Divested
12 Entity reported a suspicious order from Dixon Shane to the Chicago Field Office.
13 ALLERGAN_MDL_02176488 at -6490.

16 4. Quality King Healthcare, Inc.

17 Divested Entities' documents reflect some of the correspondence related to the investigation of
18 Quality King Healthcare, Inc., including Acquired_Actavis_01675041 and
19 ALLERGAN_MDL_03407212. Tom Napoli testified in the MDL that after the acquisition of Actavis
20 LLC f/k/a Actavis Inc. (a Divested Entity) and other Divested Entities, he personally remembers
21 preemptively reporting Quality King to Richard Springer of the Long Island DEA office, before accepting
22 Quality King as a customer for controlled substances. *See Napoli MDL Dep. 339:18-340:14.* There were
23 no particular orders at issue. Because Allergan is unaware of any written record of all suspicious orders
24 the Divested Entities reported to the DEA, Allergan cannot confirm that the list above contains all
25 suspicious orders that Divested Entities that were DEA registrants ever reported to the DEA, or whether
26 additional orders were reported verbally, electronically, or in writing. Allergan reserves the right to
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1 supplement this list with information about additional suspicious order reports to the extent that
2 information becomes available. Finally, Allergan states that Requests related to generic opioid
3 medications sold by Divested Entities are more appropriately directed to the Actavis Generic Defendants.

4 **INTERROGATORY NO. 8:** Please identify each order arising out of the State of California for
5 a controlled substance that was held, pended, suspended or the like as a result of your suspicious order
6 monitoring program but ultimately was released and the reason(s) for the release, and please identify the
7 Bates numbers or otherwise the documents that correspond to or concern each such order, including any
8 data, investigation files, reports and communications regarding such orders so that a jury may correlate
9 each such order in your written answer to its relevant documents.

10 **JUNE 28, 2021 AMENDED AND SUPPLEMENTAL RESPONSE TO INTERROGATORY**

11 **NO. 8:** Allergan incorporates by reference the General Objections, Objections to Instructions, and
12 Objections to Definitions. Allergan also objects to the extent this Interrogatory is not limited to Kadian®
13 and Norco® as overly broad, unduly burdensome, as calling for irrelevant information, and as not
14 proportional to the needs of the case.
15

16
17 Subject to and without waiving its objections, and subject to further investigation, discovery and
18 proceedings in this matter, Allergan answers as follows:

19 Allergan states that none of the Allergan entities manufactured or distributed opioids in San
20 Francisco, in California or elsewhere, or ever has been a DEA registrant for the manufacture or distribution
21 of Schedule II controlled substances.
22

23 Answering further, on information and belief, Allergan responds by identifying the following
24 documents of Divested Entities that were DEA registrants related to suspicious order monitoring activities
25 potentially “arising out of the State of California”:

- 26
- Exhibit A contains the Bates numbers for SOMS Investigation Forms with a “Sold To” or “Ship To”
27 address in California.
 - Exhibit B contains the SOMS Investigation Forms in Exhibit A plus their family members and
28 attachments.

- 1 • Exhibit C contains emails with the subject “order* on hold” or “order* of interest” or (order* w/3
2 SOMS), which also contain “CA” or “California.” Please note that emails reflecting due diligence into
3 flagged orders often—but not always—used such subject lines, and therefore these documents reflect
4 some, but not all, discussion about flagged orders relating to California.
- 5 • Exhibit D contains the emails in Exhibit C plus their family members/attachments.
- 6 • Exhibit E contains a variety of due diligence files related to orders—whether or not the underlying
7 order has a “sold to” or “ship to” address in California—which contain “CA” or “California.”

8 Finally, Allergan states that Requests related to generic opioid medications sold by Divested
9 Entities are more appropriately directed to the Actavis Generic Defendants.

10 **INTERROGATORY NO. 9:** Concerning your lobbying efforts related to opioids at the national
11 level and/or in State of California from 1996 to present, including bills you registered to lobby, please: (a)
12 identify with specificity each payment, including, but not limited to, the identity of the payor and payee,
13 the amount paid, the date of the payment, the nature of the engagement (e.g., the lobbying effort for which
14 the payment was made; the temporal scope of that effort); and (b) identify each person or persons involved
15 in the decision to engage in such lobbying efforts or register to lobby on a payment-by-payment basis.
16 The response shall include, but not be limited to, information concerning your lobbying and your
17 registration for lobby for activities related to Senate Bill 483, Ensuring Patient Access and Effective Drug
18 Enforcement Act of 2016.

19 **SEPTEMBER 13, 2021 SECOND AMENDED AND SUPPLEMENTAL RESPONSE TO**
20 **INTERROGATORY NO. 9:** Allergan incorporates by reference the General Objections, Objections to
21 Instructions, and Objections to Definitions. Further, Allergan objects to the number of discrete subparts
22 of this Interrogatory as not proportional to the needs of the case and a failure to comply with the limit on
23 the number of interrogatories a party may serve absent leave of court. Allergan objects to the Interrogatory
24 as vague and ambiguous to the extent it asks Allergan to identify any “lobbying efforts related to opioids.”
25 Allergan further objects to Interrogatory as overbroad, irrelevant, and unduly burdensome to the extent it
26 seeks information unrelated to opioids and San Francisco and information regarding constitutionally
27 protected activity.
28

1 Subject to and without waiving its objections, and subject to further investigation, discovery and
2 proceedings in this matter, Allergan answers as follows:

3 Allergan is not aware of any such government lobbying it or any Divested Entity performed in an
4 effort to influence California or federal law, policy, or regulations or standards of care specific to Kadian®
5 and Norco®, or, on information and belief, generic opioid medications sold by Divested Entities or opioids
6 generally.
7

8 Answering further, Allergan states that based on its reasonable investigation to date, the only
9 potentially responsive activity any registered lobbyist engaged in specific to opioids was Loredana
10 Cromarty's attendance at a meeting in New Jersey between 2011 and 2013 with a member of the New
11 Jersey Legislature in which abuse deterrent opioids were discussed. At the time, New Jersey was
12 considering how to regulate abuse deterrent opioids as compared to other opioids. Ms. Cromarty was not
13 an active participant at the meeting (which involved multiple participants with no affiliation with Allergan
14 or, on information and belief, Divested Entities) and neither spoke nor submitted information related to
15 this issue. Given her limited participation in this meeting that occurred many years ago, Ms. Cromarty
16 was unable to give a more precise date for this meeting than the date range already provided.
17

18 Answering further, Allergan states that a federal registered lobbyist, The D Major Group, disclosed
19 in a first-quarter 2015 periodic lobbying report that its lobbying activities included issues related to Senate
20 Bill 483, Ensuring Patient Access and Effective Drug Enforcement Act of 2016 (which the disclosure
21 referred to Ensuring Patient Access and Effective Drug Enforcement Act of 2015), among other
22 issues. Based on its reasonable investigation to date, Allergan understands that identifying this bill on the
23 lobbying report was the result of being as comprehensive as possible, and that neither Allergan, nor its
24 affiliates, nor their agents (or, on information and belief, Divested Entities) were involved in lobbying
25 anyone from Congress regarding Senate Bill 483, Ensuring Patient Access and Effective Drug
26 Enforcement Act of 2016. Moreover, it is a common practice for lobbyists to list all the issues which
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1 could potentially affect a given company in a particular industry regardless of whether that company and
2 its registered representatives take any action on the issue.

3 Based on the information in Allergan's possession, custody, or control, it appears that Actavis Inc.
4 n/k/a Actavis LLC (a Divested Entity) was a member of the Generics Pharmaceutical Association, an
5 organization that independently engaged in lobbying regarding opioids. Doug Boothe testified in his
6 deposition in the federal MDL Track One cases that he sat on the board of the Generics Pharmaceutical
7 Association, or GPhA, at various times from 2006 to 2014 or 2015. D. Boothe Dep., 431:3-14. Mr.
8 Boothe testified that the Generics Pharmaceutical Association is a lobbying association advocating at both
9 the federal and state levels on issues pertinent to manufacturers of generic medications. D. Boothe Dep.,
10 431:18-432:7. Mr. Boothe further testified that the Actavis Generics Defendants did not themselves
11 engage in any lobbying through the Generics Pharmaceutical Association, Boothe Dep. 432:16-433:10,
12 and Allergan has not identified information suggesting that Actavis Inc. n/k/a Actavis LLC (a Divested
13 Entity) itself engaged in lobbying specific to opioids or directed the Generics Pharmaceutical Association
14 to engage in lobbying specific to opioids. Ms. Joyce DelGaudio (Executive Director of Regulatory Affairs
15 at a Divested Entity) testified in her deposition that the Generics Pharmaceutical Association facilitated
16 communications between the FDA and manufacturers of generics medications, such as, on the one hand,
17 by presenting comments by manufactures of generics medications to the FDA and, on the other, assisting
18 the FDA in distributing new guidance to manufacturers of generic medications. DelGaudio Dep. 212:6-
19 24. Allergan understands on information and belief that Divested Entities supported the Generic
20 Pharmaceutical Association's support for the California ePedigree Law, which was aimed at combatting
21 counterfeit prescriptions from entering legitimate supply chains. Acquired_Actavis_01167544;
22 Acquired_Actavis_01167545; Acquired_Actavis_01167557. Individuals who appear to have knowledge
23 regarding Actavis Inc.'s participation in this organization include Mr. Boothe and Ms. DelGaudio.
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1 The Generics Pharmaceutical Association is now known as the Association for Accessible
2 Medicines, or AAM. *See* J. DelGaudio Dep. 211:22-212:2. On its publicly available website, AAM states
3 that it “works to ensure more generic and biosimilar medicines are more accessible to more people who
4 need them.”⁹ A review of the materials on AAM’s website indicates that AAM represents manufacturers
5 of generic or biosimilar medicines *generally*—that is, upon information and belief, AAM is *not* an
6 organization focused solely, or in major part, on generic opioids, but rather a host of generic and biosimilar
7 medications of all kinds.¹⁰ Finally, Allergan states that Requests related to generic opioid medications
8 sold by Divested Entities are more appropriately directed to the Actavis Generics Defendants.
9

10 **INTERROGATORY NO. 10:** Identify each and every recipient of the funds from Teva
11 Pharmaceutical Industries Ltd. pursuant to the Master Purchase Agreement as of July 26, 2015 between
12 Allergan plc and Teva Pharmaceutical Industries Ltd., and all subsequent disbursements from those
13 recipients, including to Allergan plc or any shareholder, subsidiary or controlled entity.
14

15 **JUNE 28, 2021 AMENDED AND SUPPLEMENTAL RESPONSE TO INTERROGATORY**
16 **NO. 10:** Allergan incorporates by reference the General Objections, Objections to Instructions, and
17 Objections to Definitions set out above. Allergan also objects to this Interrogatory as calling for irrelevant
18 information and not proportional to the needs of the case. Allergan further objects to the extent this
19 Interrogatory is not limited to Kadian® and Norco® as overly broad, unduly burdensome, as calling for
20 irrelevant information, and as not proportional to the needs of the case. Allergan further objects to the
21 phrase “all subsequent disbursements” as vague, overbroad, irrelevant, and not proportional to the needs
22 of this case.
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27 ⁹ *About the Association*, Am. Ass’n Meds., <https://accessiblemeds.org/about>.

28 ¹⁰ *See generally* Am. Ass’n Meds, <https://accessiblemeds.org/>.

1 Subject to and without waiving its objections, and based on its reasonable investigation to date,
2 Allergan states that it agrees to continue to meet and confer with Plaintiff regarding the provision of
3 information regarding the flow of funds resulting from the stock sale of the separate and distinct Divested
4 Entities (including Actavis Generic Defendants) to Teva Pharmaceutical Industries Ltd.

5
6 **INTERROGATORY NO. 11:** Please identify each person you employed or who was your
7 consultant or paid agent who was simultaneously a board member, officer, member or who otherwise
8 participated in the activities of any of the organizations listed below. For each person identified, please
9 list, on an organization-by-organization basis: (a) the date range of the person's membership or
10 participation; (b) the person's role or roles during that time period; (c) all payments you made, whether
11 membership or otherwise, on that person's behalf; and (d) all meetings the person attended, whether in
12 person or remotely. The organizations are:

- 13 1. Healthcare Distribution Alliance, formerly known as Healthcare Distribution Management
14 Association, formerly known as National Wholesale Druggists Association ("NWDA");
- 15 2. HDA Research Foundation, formerly known as Center for Healthcare Supply Chain
16 Research (formed by the NWDA);
- 17 3. National Association of Chain Drug Stores;
- 18 4. American Pain Foundation, including National Initiative on Pain Control;
- 19 5. American Academy of Pain Medicine;
- 20 6. Federation of State Medical Boards;
- 21 7. Alliance for Patient Access;
- 22 8. United States Pain Foundation;
- 23 9. American Geriatrics Society;
- 24 10. Pharmaceutical Research and Manufacturers of America;
- 25 11. Pain Care Forum, including Pain Care Coalition and Powers Pyles Sutter & Verville PC;
- 26 12. American Pain Society;
- 27 13. C.A.R.E.S Alliance;
- 28 14. New Jersey Pharmaceutical Industry Group; and

1 15. American Chronic Pain Association.

2 **JUNE 28, 2021 AMENDED AND SUPPLEMENTAL RESPONSE TO INTERROGATORY**

3 **NO. 11:** Allergan incorporates by reference the General Objections, Objections to Instructions, and
4 Objections to Definitions. Allergan further objects to the extent this Interrogatory is not limited to
5 Kadian® and Norco® as overly broad, unduly burdensome, as calling for irrelevant information, and as
6 not proportional to the needs of the case. Allergan also objects to the undefined terms “consultant or paid
7 agent” as vague and overly broad. Allergan further objects to the phrase “who otherwise participated in
8 the activities” as broad, vague, and unduly burdensome. Further, Allergan objects to the number of
9 discrete subparts of this Interrogatory as not proportional to the needs of the case and a failure to comply
10 with the limit on the number of interrogatories a party may serve absent leave of court.
11

12 Subject to and without waiving its objections, and subject to further investigation, discovery and
13 proceedings in this matter, Allergan answers as follows:
14

15 Allergan states that none of the Allergan entities marketed opioids in San Francisco, in California
16 or elsewhere. As such, it has not “employed” anyone in the United States involved in these organizations.

17 Answering further, based on its reasonable investigation to date, Allergan states that the following
18 individuals may have attended HDMA/HDA meetings while employed by a Divested Entity: Michael
19 Perfetto, Nancy Baran, Jinping McCormick, David Myers, Rachele Galant, and Mary Woods.¹¹
20

21 Based on the information in Allergan’s possession, custody, or control, it appears that Divested
22 Entities were members of the National Association of Chain Drugstore (NACDS), and their employees at
23 times would attend NACDS conferences and trade shows for the purpose of networking with their
24 wholesaler and distributor customers. *See* M. Woods Dep., 72:22–76:18, 77:23– 80:5; D. Myers Dep.,
25 100:4–19. During their depositions in the federal MDL, some Divested Entity employees indicated that
26

27 ¹¹ Mary Woods was employed by Actavis Pharma, Inc. f/k/a Watson Pharma, Inc. (a Divested Entity) through 2015, including
28 the time of her primary involvement with suspicious order monitoring. Since 2016, she has been employed by Allergan USA,
Inc.

1 they have, at times, attended such meetings. Those employees include David Myers (D. Myers Dep.,
2 96:2-4); Michael Perfetto (M. Perfetto Dep., 388:18-389:1); Jinping McCormick (J. McCormick Dep.,
3 132:18-21); and Doug Boothe (D. Boothe Dep., 247:16-21). Further information regarding the
4 HDMA/HDA and NACDS conferences/trade shows attended by Divested Entities' employees, including
5 dates, locations, and attendance fees/dues can be found in documents and testimony previously produced
6 to Plaintiff. *See, e.g.,* Acquired_Actavis_02227982, Acquired_Actavis_00947645,
7 Acquired_Actavis_02472414, Acquired_Actavis_00954482, ALLERGAN_MDL_02153444, M. Perfetto
8 Dep. Dec. 12, 2018 Dep. 372:1-10 J. McCormick Jan. 9, 2019 Dep. 321:8-11, M. Woods Jan. 9, 2019
9 30(b)(6) Dep. at 74:8-76:18, N. Baran Dec. 11, 2018 Dep. 359:20-361:4, D. Myers Dec. 13, 2018 Dep.
10 76:2:-18. The New Jersey Pharmaceutical Industry Group ("NJPIG") was formed per the suggestion of
11 the local DEA. It appears that Divested Entity employees Omar Plaza, Tracey Hernandez, and Tom
12 Napoli attended New Jersey Pharmaceutical Industry Group meetings between 2008 and 2011. *See e.g.,*
13 ALLERGAN_MDL_02166058; ALLERGAN_MDL_03739622; ALLERGAN_MDL_03953259.
14 Allergan refers Plaintiff to its response to Interrogatory No. 9 for further information responsive to this
15 Interrogatory.
16
17

18 Answering further, Allergan states that in anticipation of the approval and launch of MoxDuo,
19 certain Divested Entities' employees and/or consultants attended the American Pain Society conference
20 in Honolulu, Hawaii in May 2012 and an American Pain Society planning session in September 2012. *See*
21 ALLERGAN_MDL_00459175; ALLERGAN_MDL_00040481; D. Boothe Jan. 1, 2019 Dep. 433:18-
22 434:2. MoxDuo, however, was never approved, and, on information and belief, the Divested Entities
23 never commercially manufactured, marketed, or sold MoxDuo. *See*
24 ALLERGAN_MDL_00165809. Based on Allergan's reasonable investigation to date, it has identified no
25 other involvement by the Divested Entities with American Pain Society.
26
27
28

1 Answering further, Allergan states that it has not identified to date any Allergan or Divested Entity
2 employee, consultant, or agent involved with Kadian® or Norco®, or, on information and belief, the
3 generic opioids sold by the Divested Entities who participated in the activities of any of the other listed
4 organizations.

5 **INTERROGATORY NO. 12:** Describe all actual or potential compliance violations that you
6 learned of, identified, investigated or reported (including, but not limited to, compliance with United
7 States Food and Drug Administration or DEA regulations or any other California or federal law) that relate
8 to marketing, prescribing, distribution or dispensing of opioids in San Francisco, including by specifying
9 the date(s) and nature of the violations, the employees or agents who committed the violations and any
10 corrective action taken.
11

12 **JUNE 28, 2021 AMENDED AND SUPPLEMENTAL RESPONSE TO INTERROGATORY**

13 **NO. 12:** Allergan incorporates by reference the General Objections, Objections to Instructions, and
14 Objections to Definitions. In addition, Allergan objects to this Interrogatory as overly broad, unduly
15 burdensome, vague, and ambiguous to the extent this Interrogatory purports to call for “all actual or
16 potential compliance violations that you learned of, identified, investigated, or reported . . . that relate to
17 marketing, prescribing, distribution, delivering, or dispensing of opioids in San Francisco” Allergan
18 also objects to the extent this Interrogatory is not limited to Kadian® and Norco® as overly broad, unduly
19 burdensome, as calling for irrelevant information, and as not proportional to the needs of the case. Further,
20 Allergan objects to the number of discrete subparts of this Interrogatory as not proportional to the needs
21 of the case and a failure to comply with the limit on the number of interrogatories a party may serve absent
22 leave of court.
23

24 Subject to and without waiving its objections, and subject to further investigation, discovery and
25 proceedings in this matter, Allergan answers as follows:
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1 Allergan states that none of the Allergan entities marketed or sold opioids in San Francisco, in
2 California or elsewhere, except Allergan USA, Inc. sold Kadian® and Norco® in San Francisco, in
3 California and elsewhere starting in about August 2016.

4 Answering further, Allergan states that, in December 2008, Actavis Elizabeth LLC (a Divested
5 Entity) obtained Kadian® through an asset purchase agreement (but none of the liabilities arising from
6 pre-acquisition conduct) from King Pharmaceuticals, Inc., which had recently acquired Alpharma. By
7 contract dated May 1, 2009, Actavis Kadian LLC (a Divested Entity) retained Ventiv Commercial
8 Services, LLC (subsequently known as inVentiv) to provide a contract salesforce. As part of those
9 activities, Actavis Elizabeth LLC (a Divested Entity) submitted marketing materials to the FDA under
10 cover of Form FDA-2253 for the FDA's evaluation. Among the submitted materials was a "Co-Pay
11 Assistance Program" brochure and a "PK to PK Comparison Detailer." In February 2010, the FDA sent
12 Actavis Elizabeth LLC (a Divested Entity) a "Warning Letter" regarding these materials. In response,
13 Actavis Elizabeth LLC (a Divested Entity) immediately took action. For example, it quarantined all
14 marketing materials, leaving only the medication's FDA-approved full prescribing information for use in
15 the field. In addition, Actavis Elizabeth LLC (a Divested Entity) worked with the FDA on a corrective
16 action plan. The plan included Dear Doctor Letters, Dear Consumer Letters, and the hiring of additional
17 individuals to distribute corrective materials in the field. The FDA approved the corrective action plan
18 and execution of same in response to the "Warning Letter" and took no further action.

19 Based on its reasonable investigation to date, Allergan is not aware of any other potential
20 compliance violations that relate to Kadian® or Norco® marketing, prescribing, distribution, delivering,
21 or dispensing in California. Finally, Allergan states that Requests related to generic opioid medications
22 sold by Divested Entities are more appropriately directed to the Actavis Generic Defendants.

23 **INTERROGATORY NO. 13:** For suspicious orders or diversion in, affecting or originating from
24 San Francisco, identify: (a) the name, number and DEA registration number, if applicable, of the customer,
25

1 prescriber, patient or order; (b) the date of identification; (c) the date of report, if applicable; (d) the basis
2 for suspicion; and (e) what action(s), if any, you took to address the suspicion (e.g., investigated and
3 cleared, not shipped, reported).

4 **JUNE 28, 2021 AMENDED AND SUPPLEMENTAL RESPONSE TO INTERROGATORY**

5 **NO. 13:** Allergan incorporates by reference the General Objections, Objections to Instructions, and
6 Objections to Definitions. Allergan further objects to the extent this Interrogatory is not limited to
7 Kadian® and Norco® as overly broad, unduly burdensome, as calling for irrelevant information, and as
8 not proportional to the needs of the case. Allergan also objects to the verb “affecting” as vague, overbroad,
9 and ambiguous. In addition, Allergan objects to this Interrogatory as overly burdensome to the extent it
10 asks Allergan to summarize documents and data that Allergan has previously produced.

11
12 Subject to and without waiving its objections, and subject to further investigation, discovery and
13 proceedings in this matter, Allergan answers as follows:

14
15 Allergan directs Plaintiff to its response to Interrogatories 7 and 8 for the information responsive
16 to this Interrogatory. Allergan states that none of the Allergan entities manufactured or distributed opioids
17 in San Francisco, in California or elsewhere, or ever has been a DEA registrant for the manufacture or
18 distribution of Schedule II controlled substances.

19
20 Answering further, based on the information in Allergan’s possession, custody, or control, it
21 appears that the meaning of the “reason codes” (also referred to as the “release codes”) referenced in the
22 Divested Entities’ SOMS Investigation Forms identified in response to Interrogatory No. 8 are as follows:

23

Release codes	
01	Increased supply to new or existing customer/patient
02	Increased supply to new facility
03	Consistent with customer order pattern
04	Increased stocking due to Watson promotion/price change
05	Change in ordering frequency/increased seasonal usage

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06	Consolidation of customer's facilities
07	Introduction of new product or product reintroduction
08	First time order for product
09	Consistent with customer class order pattern
10	Order meets minimum order quantities
11	Customer Type coding error
12	Administration Release Customer Call Not Required
13	Released unchanged with DEA concurrence

See, e.g., ALLERGAN_MDL_04537277. Based on the information in Allergan's possession, custody, or control, Allergan understands that the reference to "DEA concurrence" in release code number 13 refers to the Divested Entities' DEA Affairs Department, rather than the U.S. Drug Enforcement Agency.

Answering further, to the extent that this Interrogatory seeks information regarding potential diversion reported to the U.S. Drug Enforcement Agency, Allergan refers Plaintiff to the Divested Entities' DEA Form 106s reporting theft or loss of controlled substances that have been produced to Plaintiff, namely those listed in Exhibit G. Finally, Allergan states that Requests related to generic opioid medications sold by Divested Entities are more appropriately directed to the Actavis Generic Defendants.

INTERROGATORY NO. 14: Identify all employees, vendors or third parties you employed for the purposes of analyzing sales or marketing of your pharmaceuticals that cover or cover your opioids, including return on investment, prescriber rankings, sales representative rankings, sales representative call plans, prescriber takeaways or efficacy of messages or specific promotional publications and all data sources and metrics they employed.

JUNE 28, 2021 AMENDED AND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 14: Allergan incorporates by reference the General Objections, Objections to Instructions, and Objections to Definitions. Allergan also object to the multiple, undefined subparts as vague and overbroad. In addition, Allergan objects to the extent this Interrogatory is not limited to Kadian® and Norco® as

1 overly broad, unduly burdensome, as calling for irrelevant information, and as not proportional to the
2 needs of the case. Allergan further objects to the extent this Interrogatory is not limited to employees,
3 vendors, or third parties that participated in marketing activities in San Francisco or California.

4 Subject to and without waiving its objections, and based on its reasonable investigation to date,
5 Allergan states that the table below identifies the primary persons employed (including consultants and
6 contractor employees) by (1) the Divested Entities who were involved in the limited marketing of
7 Kadian® in San Francisco and (2) Allergan and/or its affiliates who have knowledge about the lack of any
8 marketing of Kadian®, along with their titles and relevant employment dates:
9

10 Individual	Title	Approximate 11 Dates
Jennifer Altier	Marketing Director-Consultant	2010-2014
12 Shelley Fitch	Sales Representative employed by inVentiv	2009-2012
13 Robin Hagy	Sales Representative employed by inVentiv	2010-2011
Chris Hepp	Regional Sales Manager employed by inVentiv	2009-2012
14 Mark Killion	Regional Sales Manager employed by inVentiv	2009-2012
Adriana Knoblauch	Sales Representative employed by inVentiv	2011-2012
15 Michael Kuderka	Executive Director, Marketing Established Brands	2014-2018
Nathalie Leitch	Associate Marketing Director	2008-2016
16 Lisa Miller	Product Manager - Consultant	2012-2013
17 Julie Snyder	Associate Vice President, Marketing (current title)	2007-Present
18 Debbie Webb	Sales Representative employed by inVentiv	2010-2011

19 The primary people involved with the Divested Entities' sales of generic medications, including
20 generic opioids, included Michael Doresey, Jinping McCormick, David Myers, and Mike Perfetto.
21 Allergan provides the following information regarding vendors the Divested Entities retained for purposes
22 relating to Kadian®, and/or Norco®:
23

- 24 • **Adheris:** Retained by Actavis Kadian LLC (a Divested Entity) to conduct an “adherence program.”
- 25 • **Agency RX LLC:** Retained by Actavis Elizabeth LLC (a Divested Entity) or another Divested Entity
26 to assist in updating Kadian® marketing materials of Alpharma (a separate, independent entity that
27 was never affiliated in any manner with Allergan).
- 28 • **Alert Marketing:** Retained by Actavis Inc. n/k/a Actavis LLC (a Divested Entity) in approximately
late 2012 to coordinate email messages regarding availability of new strengths of Kadian®.

- 1 • **Buzzeo/Cegedim/Dendrite:** Retained by Watson Pharma, Inc. n/k/a Actavis Pharma, Inc.; Actavis
2 Inc. n/k/a Actavis LLC; and Actavis Pharma, Inc. (all Divested Entities) to provide suspicious order
3 monitoring-related consulting services.
- 4 • **Cadent Medical Communications:** Retained by Actavis Kadian LLC (a Divested Entity) to prepare
5 materials for a potential Kadian® speakers' bureau, which was never implemented and never occurred.
- 6 • **Campbell Alliance (and its successors):** Divested Entities and Allergan Sales, LLC (after about
7 August 2016) along with other separate, independent, and unaffiliated manufacturers of extended
8 release opioid analgesics entered an REMS Program Agreement ("RPA"), which created the RPA
9 Participants Committee ("RPC"). The RPC partnered with Campbell Alliance to run the day-to-day
10 activities of the REMS.
- 11 • **Creative Health Solutions, LLC / Gerard Cignarella:** Retained by Actavis Inc. n/k/a Actavis LLC
12 (a Divested Entity) for a limited time in 2009 to assist in activities related to limited marketing of
13 Kadian®.
- 14 • **Digital Direct / Tursack:** Retained by Actavis Inc. n/k/a Actavis LLC (a Divested Entity) to provide
15 printing services for various Kadian® marketing materials.
- 16 • **Health Products Research:** Retained by Actavis Inc. n/k/a Actavis LLC (a Divested Entity) to
17 analyze various prescribing data and report on the sales impact of field-based marketing of Kadian®.
- 18 • **Inflexion, Inc.:** Retained by Actavis Elizabeth LLC (a Divested Entity) to perform National
19 Addictions Vigilance Intervention Program ("NAVIPPRO") reports and Annual Periodic Safety
20 Reports for Kadian®.
- 21 • **IQVIA/IMS Health:** Retained by Actavis Inc. n/k/a Actavis LLC (a Divested Entity) in April 2012
22 to provide "physician office and retail tracking data for CII narcotics," including medical claims
23 history from September 1999 for patients seen in physician offices and prescription claims history
24 from April 2001 for patients receiving a prescription via a retail pharmacy.
25 (ALLERGAN_MDL_01890770). Retained by Actavis Inc. n/k/a Actavis LLC (a Divested Entity) in
26 April 2012 to provide a one-time delivery of data related to "hospital and retail tracking of patients
27 administered CII narcotics" from March 2011 through February 2012
28 (ALLERGAN_MDL_01890777; ALLERGAN_MDL_01890783). On May 15, 2018, Allergan USA,
Inc. purchased IQVIA's XPONENT and XPONENT PLANTRAK products related to prescriptions
of opioids from 1997 through 2017 as part of its defense in litigation.
(ALLERGAN_MDL_02949563). This data was not previously in Allergan's possession, custody, or
control and was never used in any manner outside of the litigation.
- **Jennifer Altier / Altier Consulting LLC:** Retained by Actavis Kadian, LLC (a Divested Entity) to
assist in the management of the marketing of Kadian®, develop sales, marketing, and training
materials, manage vendor relationships, develop marketing and tactical plans, and manage the
marketing budget.
- **John Librie:** Retained by Actavis Kadian LLC (a Divested Entity) to assist in retaining, training, and
managing in-person detailing and telesales support for Kadian®.
- **Dr. Joseph P. Valenza:** Retained by Actavis Kadian LLC (a Divested Entity) to conduct training for
inVentiv sales representatives in May 2009.
- **KAI Research, Inc.:** Retained by Actavis Inc. n/k/a Actavis LLC (a Divested Entity) to conduct post-
marketing safety surveillance, including adverse event reporting and responding to medical
information questions and product complaints related to Kadian®.
- **Keith Bernius / KEB Consulting LLC:** Retained by Actavis Inc. n/k/a Actavis LLC (a Divested
Entity) to provide some marketing-related services related to Kadian®.
- **MediMedia Information Technologies, LLC / Triple i:** Retained by Actavis Kadian LLC (a
Divested Entity) to develop, print, and distribute the coupons for the Kadian® copay assistance card.

1 Customer service representatives informed physicians about the acquisition of Kadian® and the
2 Kadian® co-pay program and sent out pharmacy emails regarding the Kadian® co-pay program.
3 MediMedia also provided FormTrak On Demand and quarterly data reports with formulary
4 information for US managed care organizations related to Kadian®.

- 5 • **Michael Hilton:** Retained by Actavis Kadian LLC (a Divested Entity) to assist with detailing and
6 telesales support for Kadian®.
- 7 • **R&J and Catalyst:** Retained by Actavis Elizabeth LLC (a Divested Entity) to provide advertising
8 services related to Kadian®.
- 9 • **Source Healthcare Analytics, Inc., a subsidiary of Wolters Kluwer Health, Inc.:** Retained by
10 Actavis Inc. n/k/a Actavis LLC (a Divested Entity) to provide data about national prescription trends
11 and prescriber activity related to Kadian®.
- 12 • **Technekes, LLC:** Retained by Actavis Inc. n/k/a Actavis LLC (a Divested Entity) to provide
13 telemarketing representatives to market Kadian® and to fulfill requests for Kadian® co-pay cards.
- 14 • **Tegra Analytics, LLC:** Retained by Actavis Inc. n/k/a Actavis LLC (a Divested Entity) to provide
15 monthly prescription reporting, key statistics, performance measurements, prescriber information, and
16 weekly reports on trends related to Kadian®.
- 17 • **TGaS® Advisors:** Retained by Actavis Kadian LLC (a Divested Entity) to advise on establishing and
18 maintaining a branded commercial presence, deploying a sales force, assisting with managed markets,
19 and best practices in pharmaceutical commercial operations, related to Kadian®.
- 20 • **TMS Health:** Retained by Actavis Kadian LLC (a Divested Entity) to conduct a telemarketing
21 program to market Kadian®.
- 22 • **Two Labs Marketing, LLC:** Retained by Actavis Inc. n/k/a Actavis LLC (a Divested Entity) after
23 Actavis Elizabeth LLC (a Divested Entity) acquired Kadian® to determine number of Kadian® units
24 sold by Alphantra (a separate, independent entity that was never affiliated in any manner with Allergan
25 Finance) that remained in the distribution channel as of the end of 2008.
- 26 • **UPS Supply Chain Solutions (“UPS”):** Retained by Actavis Inc. n/k/a Actavis LLC (a Divested
27 Entity) to provide warehouse distribution services, including receiving, storing, packing, and making
28 available for shipment Kadian® and/or Norco®. In this role, UPS performed all necessary monthly
or quarterly state and/or DEA ARCOS reporting regarding all Kadian® and/or Norco® transactions
processed for each warehouse. Starting approximately August 2016, UPS performed these same
services with respect to Kadian® and Norco® for Allergan USA, Inc.
- **ValueCentric, LLC:** Retained by Actavis Kadian LLC (a Divested Entity) to provide
services/systems related to 852 data, 867 data, and suspicious order monitoring.
- **Ventiv Commercial Services, LLC (“inVentiv”):** Retained by Actavis Kadian LLC (a Divested
Entity) to provide a contract sales force for Kadian® for certain periods between May 1, 2009 and
December 31, 2012.
- **Vertical Health Media, LLC:** Retained by Actavis Inc. n/k/a Actavis LLC (a Divested Entity) to help
coordinate email messages regarding Kadian® between approximately June and December 2011.
- **Zuchelli and Johnson Advertising, Inc.:** Retained by Watson Pharma, Inc. n/k/a Actavis Pharma,
Inc. (a Divested Entity) to develop marketing materials for Kadian®.

25 **INTERROGATORY NO. 15:** For each of the SOMS Investigation Forms produced by Allergan
26 in response to Plaintiff’s Request for Production No. 8 and/or in prior opioids productions, identify the
27
28

1 initial creator, custodian, the individuals who contributed the data that appear on the records, and the
2 sources of such data.

3 **JUNE 28, 2021 FIRST AMENDED AND SUPPLEMENTAL RESPONSE TO**
4 **INTERROGATORY NO. 15:** Allergan incorporates by reference the General Objections, Objections
5 to Instructions, and Objections to Definitions set out above. Allergan further objects to the extent this
6 Interrogatory is not limited to Kadian® and Norco® as overly broad, unduly burdensome, as calling for
7 irrelevant information, and as not proportional to the needs of the case. In addition, Allergan objects to
8 this Interrogatory as overly burdensome to the extent it asks Allergan to summarize documents and data
9 that Allergan has previously produced.
10

11 Subject to and without waiving its objections, and subject to further investigation, discovery and
12 proceedings in this matter, Allergan answers as follows:
13

14 Allergan states that none of the Allergan entities manufactured or distributed opioids in San
15 Francisco, in California or elsewhere, or ever has been a DEA registrant for the manufacture or distribution
16 of Schedule II controlled substances. Allergan directs Plaintiff to the metadata associated with each
17 document, which contain information responsive to Plaintiff's interrogatory. The family members of these
18 documents and the metadata of the family members also provide context regarding individuals who
19 contributed to the information on each record as well as sources of such information.
20

21 Answering further, Allergan states that none of the Allergan entities is or ever has been a DEA
22 registrant for the manufacture or distribution of Schedule II controlled substances. Finally, Allergan states
23 that Requests related to generic opioid medications sold by Divested Entities are more appropriately
24 directed to the Actavis Generic Defendants.
25
26
27
28

1 Dated: September 13, 2021

/s/ Karl Stampfl
Zachary W. Byer
KIRKLAND & ELLIS LLP
555 South Flower Street
Los Angeles, CA 90071
Tel: (213) 680-8340
zachary.byer@kirkland.com

Jennifer G. Levy, P.C. (*pro hac vice*)
KIRKLAND & ELLIS LLP
1301 Pennsylvania Ave., N.W
Washington, D.C. 20004
Tel: (202) 879-5000
Fax: (202) 879-5200
jennifer.levy@kirkland.com

Donna Welch, P.C. (*pro hac vice*)
Timothy W. Knapp, P.C. (*pro hac vice*)
Karl Stampfl (*pro hac vice*)
KIRKLAND & ELLIS LLP
300 North LaSalle,
Chicago, IL 60654
Tel: (312) 862-2000
Fax: (312) 862-2200
donna.welch@kirkland.com
tknapp@kirkland.com
karl.stampfl@kirkland.com

*Attorneys for Defendants Allergan plc, Allergan
Finance, LLC, Allergan Sales, LLC, and Allergan
USA, Inc.*

CERTIFICATE OF SERVICE

I, Karl Stampfl, certify that on September 13, 2021, I caused the foregoing to be served via electronic mail on the individuals on the attached service list.

/s/ Karl Stampfl
Karl Stampfl

SERVICE LIST

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28

Aelish M. Baig
Hadiya K. Deshmukh
ROBBINS GELLER RUDMAN & DOWD LLP
Post Montgomery Center
One Montgomery Street,
Suite 1800 San Francisco, CA 94104
Tel: (415) 288-4545
aelishb@rgrdlaw.com
hdeshmukh@rgrdlaw.com

Dennis J. Herrera
City Attorney
Ronald P. Flynn
Yvonne R. Mere
Owen J. Clements
Sara J. Eisenberg
Jaime M. Huling Delaye
Deputy City Attorneys
Fox Plaza
1390 Market Street,
Sixth Floor
San Francisco, CA 94102
Tel: (415) 554-3944
owen.clements@sfcityatty.org

Paul J. Geller
Mark J. Dearman
Dorothy P. Antullis
ROBBINS GELLER RUDMAN & DOWD LLP
120 East Palmetto Park Road,
Suite 500
Boca Raton, FL 33432
Tel: (561) 750-3000
pgeller@rgrdlaw.com
mdearman@rgrdlaw.com
dantullis@rgrdlaw.com

Thomas E. Egler
Carissa J. Dolan
ROBBINS GELLER RUDMAN & DOWD LLP
655 West Broadway,
Suite 1900
San Diego, CA 92101
Tel: (619) 231-1058
tome@rgrdlaw.com
cdolan@rgrdlaw.com

1 Elizabeth J. Cabraser
Richard M. Heimann
2 Kevin R. Būdner
Michael Levin-Gesundheit
3 LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP
275 Battery Street,
4 29th Floor
San Francisco, CA 94111-3339
5 Tel: (415) 956-1000
ecabraser@lchb.com
6 rheimann@lchb .com
kbudner@l chb .com
7 mlevin@lchb.com

8 Paulina Do Amaral
LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP
9 250 Hudson Street,
8th Floor
10 New York, NY 10013
Tel: (212) 355-9500
11 pdoamaral@lchb.com

12 Louise Renne
RENNE PUBLIC LAW GROUP
13 350 Sansome Street,
Suite 300
14 San Francisco, CA 94104
Tel: (415) 848-7240
15 lrenne@publiclawgroup.com

16 Jennie Lee Anderson
Audrey Siegel
17 ANDRUS ANDERSON LLP
155 Montgomery Street,
18 Suite 900
San Francisco, CA 94104
19 Tel: (415) 986-1400
jennie@andrusanderson.com
20 audrey.siegel@andrusanderson.com

21 Kevin Sharp SANFORD HEISLER SHARP, LLP
611 Commerce Street,
22 Suite 3100
Nashville, TN 37203
23 Tel: (615) 434-7000
ksharp@sanfordheisler.com
24

Edward Chapin
25 SANFORD HEISLER SHARP, LLP
655 West Broadway,
26 Suite 1700
San Diego, CA 92101
27 Tel: (619) 577-4253
echapin2@ sanfordheisler.com
28

1 David S. Casey, Jr.
Gayle M. Blatt
2 Alyssa Williams
CASEY GERRY SCHENK FRANCAVILLA
3 BLATT & PENFIELD LLP
110 Laurel Street
4 San Diego, CA 92101-1486
Tel: (619) 238-1811
5 dcasey@cglaw.com
gmb@cglaw.com
6 awilliams@cglaw.com

7 Ellen Relkin
Paul Pennock
8 WEITZ & LUXENBERG P C.
700 Broadway
9 New York, NY 10003
Tel: 212/558-5500
10 erelkin@weitzlux.com
ppennock@weitzlux.com

11 Melinda Davis Nokes
12 WEITZ & LUXENBERG P C.
1880 Century Park East
13 Los Angeles, CA 90067
Tel: (310) 247-0921
14 mnokes@weitzlux.com

15 *Attorneys for Plaintiffs The City and County of*
San Francisco, California and The People of the
16 *State of California, acting by and through San*
Francisco City Attorney Dennis J. Herrera

17 Alan R. Ouellette
18 FOLEY & LARDNER LLP
555 California Street, Suite 1700
19 San Francisco, CA 94104-1520
Tel: (415) 434-4484
20 Fax: (415) 434-4507
aouellette@foley.com

21 James W. Matthews (*pro hac vice* forthcoming)
22 Ana M. Francisco (*pro hac vice* forthcoming)
Katy E. Koski (*pro hac vice* forthcoming)
23 FOLEY & LARDNER LLP
111 Huntington Avenue
24 Boston, MA 02199
Tel: (617) 342-4000
25 Fax: (617) 342-4001
jmatthews@foley.com
26 afrancisco@foley.com
kkoski@foley.com

27 *Attorneys for Defendant Anda, Inc.*
28

1 Charles J. Stevens
Joshua D. Dick
2 Kelsey J. Heiland
GIBSON, DUNN & CRUTCHER LLP
3 555 Mission Street, Suite 3000
San Francisco, CA 94105-0921
4 Tel: (415)393-8200
Fax: (415) 393-8306
5 cstevens@gibsondunn.com
jdick@gibsondunn.com
6 khelland@gibsondunn.com

7 Kaspar J. Stoffelmayr (*pro hac vice* forthcoming)
Katherine M. Swift (*pro hac vice* forthcoming)
8 BARTLIT BECK LLP
54 West Hubbard Street
9 Chicago, IL 60654
Tel: (312) 494-4400
10 Fax: (312) 494-4440
kaspar.stoffelmayr@bartlitbeck.com
11 kate.swift@bartlitbeck.com

12 *Attorneys for Defendant Walgreen Co.*

13
14 Zachary Hill (S.B. #275886)
MORGAN, LEWIS & BOCKIUS LLP
One Market, Spear Street Tower
15 San Francisco, CA 94105-1596
Tel: (415) 442-1000
16 Fax: (415) 442-1001
zachary.hill@morganlewis.com

17
18 Wendy West Feinstein (*pro hac vice*)
MORGAN, LEWIS & BOCKIUS LLP
One Oxford Centre, Thirty-Second Floor
19 Pittsburgh, PA 15219-6401
Tel: (412) 560-7455
20 Fax: (412) 560-7001
wendy.feinstein@morganlewis.com

21
22 *Attorneys for Defendants Teva*
Pharmaceuticals USA, Inc.; Cephalon,
Inc.; Actavis LLC; Actavis Pharma, Inc.
23 *f/k/a Watson Pharma, Inc; Watson*
Laboratories, Inc.; Warner Chilcott
24 *Company LLC; Actavis South Atlantic*
LLC; Actavis Elizabeth LLC; Actavis
25 *Mid Atlantic LLC; Actavis Totowa LLC;*
Actavis Kadian LLC; Actavis
26 *Laboratories UT, Inc. f/k/a Watson*
Laboratories, Inc.-Salt Lake City; and
27 *Actavis Laboratories FL, Inc. f/k/*
Watson Laboratories, Inc.-Florida.
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19
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23
24
25
26
27
28

Sean O. Morris
John D. Lombardo
ARNOLD & PORTER KAYE SCHOLER LLP
777 South Figueroa Street, 44th Floor
Los Angeles, CA 90017-5844
Tel: (213)243-4000
Fax: (213)243-4199
Sean.Morris@arnoldporter.com
John.Lombardo@arnoldporter.com

*Attorneys for Defendants Endo
Pharmaceuticals Inc., Endo Health
Solutions Inc., Par Pharmaceutical, Inc.,
and Par Pharmaceutical Companies, Inc.*

Exhibit A

ALLERGAN_MDL_01373679	ALLERGAN_MDL_01553884	ALLERGAN_MDL_03607935	ALLERGAN_MDL_04171400	ALLERGAN_MDL_04174503
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ALLERGAN_MDL_04176843	ALLERGAN_MDL_04185628	ALLERGAN_MDL_04197103	ALLERGAN_MDL_04201695	ALLERGAN_MDL_04212462
ALLERGAN_MDL_04177159	ALLERGAN_MDL_04185713	ALLERGAN_MDL_04197222	ALLERGAN_MDL_04201834	ALLERGAN_MDL_04214905
ALLERGAN_MDL_04177602	ALLERGAN_MDL_04185971	ALLERGAN_MDL_04197372	ALLERGAN_MDL_04202053	ALLERGAN_NY_00017389
ALLERGAN_MDL_04177750	ALLERGAN_MDL_04186567	ALLERGAN_MDL_04197430	ALLERGAN_MDL_04202157	
ALLERGAN_MDL_04177786	ALLERGAN_MDL_04187659	ALLERGAN_MDL_04197587	ALLERGAN_MDL_04202158	
ALLERGAN_MDL_04177880	ALLERGAN_MDL_04187732	ALLERGAN_MDL_04197676	ALLERGAN_MDL_04203851	
ALLERGAN_MDL_04178377	ALLERGAN_MDL_04188002	ALLERGAN_MDL_04197793	ALLERGAN_MDL_04204911	
ALLERGAN_MDL_04178571	ALLERGAN_MDL_04188014	ALLERGAN_MDL_04197967	ALLERGAN_MDL_04205539	
ALLERGAN_MDL_04178816	ALLERGAN_MDL_04188200	ALLERGAN_MDL_04197997	ALLERGAN_MDL_04205687	
ALLERGAN_MDL_04179055	ALLERGAN_MDL_04189126	ALLERGAN_MDL_04198108	ALLERGAN_MDL_04206358	
ALLERGAN_MDL_04179125	ALLERGAN_MDL_04190090	ALLERGAN_MDL_04198118	ALLERGAN_MDL_04206724	
ALLERGAN_MDL_04179550	ALLERGAN_MDL_04190136	ALLERGAN_MDL_04198450	ALLERGAN_MDL_04206958	
ALLERGAN_MDL_04179769	ALLERGAN_MDL_04191598	ALLERGAN_MDL_04198509	ALLERGAN_MDL_04207335	
ALLERGAN_MDL_04180499	ALLERGAN_MDL_04192117	ALLERGAN_MDL_04198670	ALLERGAN_MDL_04207498	
ALLERGAN_MDL_04180717	ALLERGAN_MDL_04192194	ALLERGAN_MDL_04198841	ALLERGAN_MDL_04207935	
ALLERGAN_MDL_04180969	ALLERGAN_MDL_04192444	ALLERGAN_MDL_04198854	ALLERGAN_MDL_04209343	
ALLERGAN_MDL_04180985	ALLERGAN_MDL_04192762	ALLERGAN_MDL_04198868	ALLERGAN_MDL_04209349	
ALLERGAN_MDL_04181325	ALLERGAN_MDL_04192771	ALLERGAN_MDL_04198881	ALLERGAN_MDL_04209362	
ALLERGAN_MDL_04181672	ALLERGAN_MDL_04192781	ALLERGAN_MDL_04198894	ALLERGAN_MDL_04209366	
ALLERGAN_MDL_04181896	ALLERGAN_MDL_04193618	ALLERGAN_MDL_04198907	ALLERGAN_MDL_04209387	
ALLERGAN_MDL_04182463	ALLERGAN_MDL_04193868	ALLERGAN_MDL_04199474	ALLERGAN_MDL_04209428	
ALLERGAN_MDL_04182652	ALLERGAN_MDL_04193941	ALLERGAN_MDL_04199793	ALLERGAN_MDL_04209431	
ALLERGAN_MDL_04182656	ALLERGAN_MDL_04194082	ALLERGAN_MDL_04200163	ALLERGAN_MDL_04209435	
ALLERGAN_MDL_04182915	ALLERGAN_MDL_04194138	ALLERGAN_MDL_04200164	ALLERGAN_MDL_04209438	
ALLERGAN_MDL_04183195	ALLERGAN_MDL_04194704	ALLERGAN_MDL_04200179	ALLERGAN_MDL_04209447	
ALLERGAN_MDL_04183244	ALLERGAN_MDL_04194806	ALLERGAN_MDL_04200180	ALLERGAN_MDL_04209495	
ALLERGAN_MDL_04183442	ALLERGAN_MDL_04194875	ALLERGAN_MDL_04200194	ALLERGAN_MDL_04209550	
ALLERGAN_MDL_04183595	ALLERGAN_MDL_04194960	ALLERGAN_MDL_04200195	ALLERGAN_MDL_04209621	
ALLERGAN_MDL_04183882	ALLERGAN_MDL_04194993	ALLERGAN_MDL_04200219	ALLERGAN_MDL_04209626	
ALLERGAN_MDL_04183989	ALLERGAN_MDL_04195029	ALLERGAN_MDL_04200220	ALLERGAN_MDL_04209662	

Exhibit B

ALLERGAN_MDL_03893588	ALLERGAN_MDL_03984759	ALLERGAN_MDL_04169590	ALLERGAN_MDL_04169663	ALLERGAN_MDL_04169725
ALLERGAN_MDL_03893589	ALLERGAN_MDL_03984760	ALLERGAN_MDL_04169592	ALLERGAN_MDL_04169665	ALLERGAN_MDL_04169727
ALLERGAN_MDL_03893590	ALLERGAN_MDL_03984761	ALLERGAN_MDL_04169594	ALLERGAN_MDL_04169668	ALLERGAN_MDL_04169728
ALLERGAN_MDL_03893591	ALLERGAN_MDL_03984762	ALLERGAN_MDL_04169596	ALLERGAN_MDL_04169670	ALLERGAN_MDL_04169729
ALLERGAN_MDL_03893592	ALLERGAN_MDL_03984763	ALLERGAN_MDL_04169598	ALLERGAN_MDL_04169672	ALLERGAN_MDL_04169730
ALLERGAN_MDL_03893593	ALLERGAN_MDL_04016544	ALLERGAN_MDL_04169599	ALLERGAN_MDL_04169673	ALLERGAN_MDL_04169731
ALLERGAN_MDL_03893594	ALLERGAN_MDL_04016546	ALLERGAN_MDL_04169600	ALLERGAN_MDL_04169674	ALLERGAN_MDL_04169732
ALLERGAN_MDL_03893595	ALLERGAN_MDL_04016548	ALLERGAN_MDL_04169601	ALLERGAN_MDL_04169675	ALLERGAN_MDL_04169733
ALLERGAN_MDL_03893596	ALLERGAN_MDL_04016554	ALLERGAN_MDL_04169602	ALLERGAN_MDL_04169677	ALLERGAN_MDL_04169734
ALLERGAN_MDL_03893597	Acquired_Actavis_02336897	ALLERGAN_MDL_04169603	ALLERGAN_MDL_04169678	ALLERGAN_MDL_04169735
ALLERGAN_MDL_03893598	Acquired_Actavis_02336898	ALLERGAN_MDL_04169604	ALLERGAN_MDL_04169680	ALLERGAN_MDL_04169736
ALLERGAN_MDL_03893599	Acquired_Actavis_02337014	ALLERGAN_MDL_04169608	ALLERGAN_MDL_04169681	ALLERGAN_MDL_04169737
ALLERGAN_MDL_03893600	Acquired_Actavis_02337015	ALLERGAN_MDL_04169610	ALLERGAN_MDL_04169682	ALLERGAN_MDL_04169739
Acquired_Actavis_02059584	Acquired_Actavis_02337217	ALLERGAN_MDL_04169617	ALLERGAN_MDL_04169684	ALLERGAN_MDL_04169740
Acquired_Actavis_02059585	Acquired_Actavis_02337219	ALLERGAN_MDL_04169620	ALLERGAN_MDL_04169685	ALLERGAN_MDL_04169744
Acquired_Actavis_02059586	ALLERGAN_MDL_04167934	ALLERGAN_MDL_04169622	ALLERGAN_MDL_04169686	ALLERGAN_MDL_04169745
Acquired_Actavis_02059622	ALLERGAN_MDL_04167936	ALLERGAN_MDL_04169623	ALLERGAN_MDL_04169687	ALLERGAN_MDL_04169746
Acquired_Actavis_02059624	ALLERGAN_MDL_04167937	ALLERGAN_MDL_04169624	ALLERGAN_MDL_04169688	ALLERGAN_MDL_04169747
Acquired_Actavis_02059625	ALLERGAN_MDL_04167938	ALLERGAN_MDL_04169626	ALLERGAN_MDL_04169689	ALLERGAN_MDL_04169749
Acquired_Actavis_02059645	ALLERGAN_MDL_04169481	ALLERGAN_MDL_04169630	ALLERGAN_MDL_04169691	ALLERGAN_MDL_04169750
Acquired_Actavis_02059646	ALLERGAN_MDL_04169544	ALLERGAN_MDL_04169632	ALLERGAN_MDL_04169693	ALLERGAN_MDL_04169852
Acquired_Actavis_02059750	ALLERGAN_MDL_04169545	ALLERGAN_MDL_04169633	ALLERGAN_MDL_04169697	ALLERGAN_MDL_04169866
Acquired_Actavis_02059752	ALLERGAN_MDL_04169549	ALLERGAN_MDL_04169636	ALLERGAN_MDL_04169699	ALLERGAN_MDL_04169955
Acquired_Actavis_02059753	ALLERGAN_MDL_04169552	ALLERGAN_MDL_04169637	ALLERGAN_MDL_04169700	ALLERGAN_MDL_04169957
Acquired_Actavis_02059754	ALLERGAN_MDL_04169553	ALLERGAN_MDL_04169639	ALLERGAN_MDL_04169701	ALLERGAN_MDL_04169961
Acquired_Actavis_02059755	ALLERGAN_MDL_04169555	ALLERGAN_MDL_04169642	ALLERGAN_MDL_04169706	ALLERGAN_MDL_04169963
Acquired_Actavis_02059787	ALLERGAN_MDL_04169558	ALLERGAN_MDL_04169643	ALLERGAN_MDL_04169707	ALLERGAN_MDL_04169964
Acquired_Actavis_02059789	ALLERGAN_MDL_04169559	ALLERGAN_MDL_04169645	ALLERGAN_MDL_04169708	ALLERGAN_MDL_04169967
Acquired_Actavis_02059793	ALLERGAN_MDL_04169561	ALLERGAN_MDL_04169646	ALLERGAN_MDL_04169709	ALLERGAN_MDL_04169968
Acquired_Actavis_02059794	ALLERGAN_MDL_04169565	ALLERGAN_MDL_04169647	ALLERGAN_MDL_04169710	ALLERGAN_MDL_04169969
Acquired_Actavis_02059795	ALLERGAN_MDL_04169571	ALLERGAN_MDL_04169650	ALLERGAN_MDL_04169713	ALLERGAN_MDL_04169971
Acquired_Actavis_02059812	ALLERGAN_MDL_04169576	ALLERGAN_MDL_04169652	ALLERGAN_MDL_04169715	ALLERGAN_MDL_04169972
Acquired_Actavis_02059814	ALLERGAN_MDL_04169577	ALLERGAN_MDL_04169654	ALLERGAN_MDL_04169716	ALLERGAN_MDL_04169973
Acquired_Actavis_02059818	ALLERGAN_MDL_04169579	ALLERGAN_MDL_04169655	ALLERGAN_MDL_04169717	ALLERGAN_MDL_04169974
Acquired_Actavis_02059819	ALLERGAN_MDL_04169580	ALLERGAN_MDL_04169656	ALLERGAN_MDL_04169718	ALLERGAN_MDL_04169975
Acquired_Actavis_02059820	ALLERGAN_MDL_04169581	ALLERGAN_MDL_04169659	ALLERGAN_MDL_04169720	ALLERGAN_MDL_04169978
ALLERGAN_MDL_03984757	ALLERGAN_MDL_04169583	ALLERGAN_MDL_04169661	ALLERGAN_MDL_04169721	ALLERGAN_MDL_04169979
ALLERGAN_MDL_03984758	ALLERGAN_MDL_04169584	ALLERGAN_MDL_04169662	ALLERGAN_MDL_04169723	ALLERGAN_MDL_04169980

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ALLERGAN_MDL_04180994 ALLERGAN_MDL_04184226 ALLERGAN_MDL_04188018 ALLERGAN_MDL_04192776 ALLERGAN_MDL_04194776
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ALLERGAN_MDL_04183444 ALLERGAN_MDL_04187659 ALLERGAN_MDL_04192766 ALLERGAN_MDL_04194714 ALLERGAN_MDL_04194840
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ALLERGAN_MDL_04201140	ALLERGAN_MDL_04202066	ALLERGAN_MDL_04207342	ALLERGAN_MDL_04214902
ALLERGAN_MDL_04201142	ALLERGAN_MDL_04202067	ALLERGAN_MDL_04207343	ALLERGAN_MDL_04214904
ALLERGAN_MDL_04201143	ALLERGAN_MDL_04202068	ALLERGAN_MDL_04207498	ALLERGAN_MDL_04214905
ALLERGAN_MDL_04201144	ALLERGAN_MDL_04202157	ALLERGAN_MDL_04207499	ALLERGAN_NY_00017388
ALLERGAN_MDL_04201146	ALLERGAN_MDL_04202158	ALLERGAN_MDL_04207935	ALLERGAN_NY_00017389
ALLERGAN_MDL_04201695	ALLERGAN_MDL_04202159	ALLERGAN_MDL_04207936	ALLERGAN_NY_00017390
ALLERGAN_MDL_04201696	ALLERGAN_MDL_04202160	ALLERGAN_MDL_04207937	ALLERGAN_NY_00017391
ALLERGAN_MDL_04201697	ALLERGAN_MDL_04202162	ALLERGAN_MDL_04207938	ALLERGAN_NY_00017392
ALLERGAN_MDL_04201698	ALLERGAN_MDL_04202163	ALLERGAN_MDL_04207939	ALLERGAN_NY_00017394
ALLERGAN_MDL_04201699	ALLERGAN_MDL_04202164	ALLERGAN_MDL_04209343	
ALLERGAN_MDL_04201701	ALLERGAN_MDL_04203851	ALLERGAN_MDL_04209349	
ALLERGAN_MDL_04201702	ALLERGAN_MDL_04203852	ALLERGAN_MDL_04209362	
ALLERGAN_MDL_04201703	ALLERGAN_MDL_04203853	ALLERGAN_MDL_04209366	
ALLERGAN_MDL_04201704	ALLERGAN_MDL_04203854	ALLERGAN_MDL_04209387	
ALLERGAN_MDL_04201705	ALLERGAN_MDL_04203855	ALLERGAN_MDL_04209428	
ALLERGAN_MDL_04201706	ALLERGAN_MDL_04203857	ALLERGAN_MDL_04209431	
ALLERGAN_MDL_04201708	ALLERGAN_MDL_04203858	ALLERGAN_MDL_04209435	
ALLERGAN_MDL_04201709	ALLERGAN_MDL_04203859	ALLERGAN_MDL_04209438	
ALLERGAN_MDL_04201710	ALLERGAN_MDL_04204911	ALLERGAN_MDL_04209447	
ALLERGAN_MDL_04201834	ALLERGAN_MDL_04205539	ALLERGAN_MDL_04209495	
ALLERGAN_MDL_04201835	ALLERGAN_MDL_04205540	ALLERGAN_MDL_04209550	
ALLERGAN_MDL_04201836	ALLERGAN_MDL_04205541	ALLERGAN_MDL_04209621	
ALLERGAN_MDL_04201837	ALLERGAN_MDL_04205542	ALLERGAN_MDL_04209626	
ALLERGAN_MDL_04201838	ALLERGAN_MDL_04205543	ALLERGAN_MDL_04209662	
ALLERGAN_MDL_04201840	ALLERGAN_MDL_04205687	ALLERGAN_MDL_04209670	
ALLERGAN_MDL_04201841	ALLERGAN_MDL_04205688	ALLERGAN_MDL_04209671	
ALLERGAN_MDL_04201842	ALLERGAN_MDL_04206358	ALLERGAN_MDL_04209677	
ALLERGAN_MDL_04202053	ALLERGAN_MDL_04206359	ALLERGAN_MDL_04209679	
ALLERGAN_MDL_04202054	ALLERGAN_MDL_04206724	ALLERGAN_MDL_04209719	
ALLERGAN_MDL_04202055	ALLERGAN_MDL_04206725	ALLERGAN_MDL_04212009	
ALLERGAN_MDL_04202056	ALLERGAN_MDL_04206958	ALLERGAN_MDL_04212010	
ALLERGAN_MDL_04202057	ALLERGAN_MDL_04206959	ALLERGAN_MDL_04212011	
ALLERGAN_MDL_04202059	ALLERGAN_MDL_04207335	ALLERGAN_MDL_04212012	
ALLERGAN_MDL_04202060	ALLERGAN_MDL_04207336	ALLERGAN_MDL_04212013	
ALLERGAN_MDL_04202061	ALLERGAN_MDL_04207337	ALLERGAN_MDL_04212014	
ALLERGAN_MDL_04202062	ALLERGAN_MDL_04207338	ALLERGAN_MDL_04212188	
ALLERGAN_MDL_04202063	ALLERGAN_MDL_04207339	ALLERGAN_MDL_04212194	

Exhibit C

Acquired_Actavis_02337531	ALLERGAN_MDL_04168604	ALLERGAN_MDL_03733859	ALLERGAN_MDL_04192784	ALLERGAN_MDL_04199577
Acquired_Actavis_02337535	ALLERGAN_MDL_04168828	ALLERGAN_MDL_04173839	ALLERGAN_MDL_04192599	ALLERGAN_MDL_04199593
Acquired_Actavis_02337540	ALLERGAN_MDL_04168856	ALLERGAN_MDL_04173841	ALLERGAN_MDL_04192608	ALLERGAN_MDL_04201317
ALLERGAN_MDL_04164886	ALLERGAN_MDL_04168867	ALLERGAN_MDL_04174172	ALLERGAN_MDL_04192616	ALLERGAN_MDL_04201326
ALLERGAN_MDL_04165358	ALLERGAN_MDL_04168871	ALLERGAN_MDL_04174174	ALLERGAN_MDL_04192624	ALLERGAN_MDL_04202956
ALLERGAN_MDL_04165362	ALLERGAN_MDL_04168879	ALLERGAN_MDL_04173922	ALLERGAN_MDL_04192631	ALLERGAN_MDL_04202968
ALLERGAN_MDL_04165367	ALLERGAN_MDL_04168886	ALLERGAN_MDL_04174874	ALLERGAN_MDL_04192636	ALLERGAN_MDL_04203009
Acquired_Actavis_02336844	ALLERGAN_MDL_04168891	ALLERGAN_MDL_04179038	ALLERGAN_MDL_04192643	ALLERGAN_MDL_04203032
Acquired_Actavis_02336865	ALLERGAN_MDL_04168898	ALLERGAN_MDL_04179049	ALLERGAN_MDL_04192650	ALLERGAN_MDL_04203034
Acquired_Actavis_02337526	ALLERGAN_MDL_04168913	ALLERGAN_MDL_01551817	ALLERGAN_MDL_04192657	ALLERGAN_MDL_04203647
Acquired_Actavis_02337741	ALLERGAN_MDL_04168916	ALLERGAN_MDL_02146417	ALLERGAN_MDL_04192668	ALLERGAN_MDL_04203652
ALLERGAN_MDL_04165235	ALLERGAN_MDL_04169740	ALLERGAN_MDL_02146428	ALLERGAN_MDL_04192675	ALLERGAN_MDL_04203657
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Exhibit D

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Exhibit E

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ALLERGAN_MDL_04207820	ALLERGAN_MDL_04208120	ALLERGAN_NY_00008726	ALLERGAN_NY_00017410	ALLERGAN_NY_00018062
ALLERGAN_MDL_04207830	ALLERGAN_MDL_04208125	ALLERGAN_NY_00016811	ALLERGAN_NY_00017412	ALLERGAN_NY_00018064
ALLERGAN_MDL_04207842	ALLERGAN_MDL_04208135	ALLERGAN_NY_00016815	ALLERGAN_NY_00017426	ALLERGAN_NY_00018068
ALLERGAN_MDL_04207845	ALLERGAN_MDL_04208140	ALLERGAN_NY_00016918	ALLERGAN_NY_00017442	ALLERGAN_NY_00018070
ALLERGAN_MDL_04207848	ALLERGAN_MDL_04208150	ALLERGAN_NY_00017076	ALLERGAN_NY_00017537	ALLERGAN_NY_00018073
ALLERGAN_MDL_04207850	ALLERGAN_MDL_04208165	ALLERGAN_NY_00017098	ALLERGAN_NY_00017654	ALLERGAN_NY_00018075
ALLERGAN_MDL_04207858	ALLERGAN_MDL_04208171	ALLERGAN_NY_00017111	ALLERGAN_NY_00017776	ALLERGAN_NY_00018079
ALLERGAN_MDL_04207860	ALLERGAN_MDL_04208173	ALLERGAN_NY_00017119	ALLERGAN_NY_00017778	ALLERGAN_NY_00018081
ALLERGAN_MDL_04207868	ALLERGAN_MDL_04208179	ALLERGAN_NY_00017132	ALLERGAN_NY_00017787	ALLERGAN_NY_00018084
ALLERGAN_MDL_04207876	ALLERGAN_MDL_04208181	ALLERGAN_NY_00017134	ALLERGAN_NY_00017797	ALLERGAN_NY_00018092
ALLERGAN_MDL_04207884	ALLERGAN_MDL_04208183	ALLERGAN_NY_00017136	ALLERGAN_NY_00017799	ALLERGAN_NY_00018099
ALLERGAN_MDL_04207892	ALLERGAN_MDL_04208189	ALLERGAN_NY_00017139	ALLERGAN_NY_00017809	ALLERGAN_NY_00018107
ALLERGAN_MDL_04207898	ALLERGAN_MDL_04208211	ALLERGAN_NY_00017142	ALLERGAN_NY_00017823	ALLERGAN_NY_00018115
ALLERGAN_MDL_04207906	ALLERGAN_MDL_04208217	ALLERGAN_NY_00017150	ALLERGAN_NY_00017868	ALLERGAN_NY_00018124
ALLERGAN_MDL_04207917	ALLERGAN_MDL_04208219	ALLERGAN_NY_00017161	ALLERGAN_NY_00017885	ALLERGAN_NY_00018131
ALLERGAN_MDL_04207928	ALLERGAN_MDL_04209827	ALLERGAN_NY_00017163	ALLERGAN_NY_00017888	ALLERGAN_NY_00018139
ALLERGAN_MDL_04207936	ALLERGAN_MDL_04209828	ALLERGAN_NY_00017169	ALLERGAN_NY_00017894	ALLERGAN_NY_00018146
ALLERGAN_MDL_04207942	ALLERGAN_MDL_04209973	ALLERGAN_NY_00017208	ALLERGAN_NY_00017908	ALLERGAN_NY_00018150
ALLERGAN_MDL_04207944	ALLERGAN_MDL_04209974	ALLERGAN_NY_00017211	ALLERGAN_NY_00017914	ALLERGAN_NY_00018153
ALLERGAN_MDL_04207961	ALLERGAN_MDL_04210034	ALLERGAN_NY_00017218	ALLERGAN_NY_00017918	ALLERGAN_NY_00018173
ALLERGAN_MDL_04207963	ALLERGAN_MDL_04211559	ALLERGAN_NY_00017238	ALLERGAN_NY_00017924	ALLERGAN_NY_00018196
ALLERGAN_MDL_04207978	ALLERGAN_MDL_04211728	ALLERGAN_NY_00017251	ALLERGAN_NY_00017942	ALLERGAN_NY_00018204
ALLERGAN_MDL_04207993	ALLERGAN_MDL_04211790	ALLERGAN_NY_00017258	ALLERGAN_NY_00017955	ALLERGAN_NY_00018207
ALLERGAN_MDL_04208002	ALLERGAN_MDL_04212011	ALLERGAN_NY_00017260	ALLERGAN_NY_00017958	ALLERGAN_NY_00018210
ALLERGAN_MDL_04208030	ALLERGAN_MDL_04212024	ALLERGAN_NY_00017266	ALLERGAN_NY_00017971	ALLERGAN_NY_00018214
ALLERGAN_MDL_04208032	ALLERGAN_MDL_04212121	ALLERGAN_NY_00017278	ALLERGAN_NY_00017999	ALLERGAN_NY_00018218
ALLERGAN_MDL_04208038	ALLERGAN_MDL_04212231	ALLERGAN_NY_00017285	ALLERGAN_NY_00018002	ALLERGAN_NY_00018261
ALLERGAN_MDL_04208040	ALLERGAN_MDL_04212782	ALLERGAN_NY_00017302	ALLERGAN_NY_00018005	ALLERGAN_NY_00018265
ALLERGAN_MDL_04208057	ALLERGAN_MDL_04212949	ALLERGAN_NY_00017309	ALLERGAN_NY_00018030	ALLERGAN_NY_00018447
ALLERGAN_MDL_04208065	ALLERGAN_MDL_04215452	ALLERGAN_NY_00017315	ALLERGAN_NY_00018033	ALLERGAN_NY_00018461
ALLERGAN_MDL_04208071	ALLERGAN_MDL_04215458	ALLERGAN_NY_00017327	ALLERGAN_NY_00018037	ALLERGAN_NY_00018474
ALLERGAN_MDL_04208073	ALLERGAN_CA_00004050	ALLERGAN_NY_00017334	ALLERGAN_NY_00018041	ALLERGAN_NY_00018478
ALLERGAN_MDL_04208079	ALLERGAN_CA_00004062	ALLERGAN_NY_00017347	ALLERGAN_NY_00018044	ALLERGAN_NY_00018500
ALLERGAN_MDL_04208088	ALLERGAN_CA_00004070	ALLERGAN_NY_00017363	ALLERGAN_NY_00018048	ALLERGAN_NY_00018516
ALLERGAN_MDL_04208090	ALLERGAN_CA_00004082	ALLERGAN_NY_00017368	ALLERGAN_NY_00018051	ALLERGAN_NY_00018523

ALLERGAN_NY_00018531
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ALLERGAN_NY_00018693
ALLERGAN_NY_00018704
ALLERGAN_NY_00018706
ALLERGAN_NY_00018708
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ALLERGAN_NY_00019133
ALLERGAN_NY_00019139
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ALLERGAN_MDL_04453550
ALLERGAN_MDL_04453558
ALLERGAN_MDL_04453570
ALLERGAN_NY_00066812
ALLERGAN_NY_00066818
ALLERGAN_NY_00066829

Exhibit F - Reserved

Exhibit G

Acquired_Actavis_00211559
Acquired_Actavis_01234871
Acquired_Actavis_01377531
Acquired_Actavis_01380053
Acquired_Actavis_01380054
Acquired_Actavis_01380055
Acquired_Actavis_01381988
Acquired_Actavis_01671748
Acquired_Actavis_01671824
Acquired_Actavis_01674373
Acquired_Actavis_01676397
Acquired_Actavis_02051829
ALLERGAN_MDL_02079476
ALLERGAN_MDL_02949568
ALLERGAN_MDL_03993801
ALLERGAN_MDL_04498991
ALLERGAN_MDL_04506970
ALLERGAN_MDL_04509165
ALLERGAN_MDL_04509170
ALLERGAN_MDL_04509284
ALLERGAN_MDL_04509305
ALLERGAN_MDL_04509721
ALLERGAN_MDL_04521270
ALLERGAN_MDL_04521286
ALLERGAN_MDL_04521287

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ALLERGAN_SF_00214043