SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF SUFFOLK

IN RE OPIOID LITIGATION	Index No. 400000/2017 Hon. Jerry Garguilo

THIS DOCUMENT RELATES TO:
Suffolk County v. Purdue Pharma L.P., et al.,
Index No. 400001/2017;
Nassau County v. Purdue Pharma L.P., et al.,
Index No. 400008/2017;
The State of New York v. Purdue Pharma L.P., et al.,
Index No. 400016/2018

CEPHALON, INC., TEVA PHARMACEUTICALS USA, INC., WATSON LABORATORIES, INC., ACTAVIS LLC, AND ACTAVIS PHARMA, INC.'S OBJECTIONS AND RESPONSES TO PLAINTIFFS' FIRST SET OF REQUEST FOR ADMISSIONS

Pursuant to Section 3123 of the Civil Practice Law and Rules ("CPLR"), the Rules of the Commercial Division of the Supreme Court of New York, and the Court's Case Management Order No. 2 (NYSCEF No. 541), Defendants Cephalon, Inc. ("Cephalon"), Teva Pharmaceuticals USA, Inc. ("Teva USA") (collectively, the "Teva Defendants"), Watson Laboratories, Inc. ("Watson Labs"), Actavis LLC, and Actavis Pharma, Inc. ("Actavis Pharma") (Watson Labs, Actavis LLC and Actavis Pharma collectively, the "Actavis Generic Defendants") serve these Objections and Responses to Plaintiffs State of New York, County of Nassau and County of Suffolk's First Set of Requests for Admission (the "Requests").

RESERVATION OF RIGHTS

1. The Teva Defendants and Actavis Generic Defendants' investigation and discovery are ongoing as to all matters referred to in these Objections and Responses to Plaintiffs' Requests. The Teva Defendants and Actavis Generic Defendants' Objections and

Responses reflect their investigation and good faith discovery efforts to date. The Teva Defendants and Actavis Generic Defendants responses are based upon information that has been collected and reviewed to date for the purpose of responding to these Requests, and they are not prepared from the personal knowledge of any single individual. The Teva Defendants and Actavis Generic Defendants reserve the right to modify and supplement their Objections and Responses as appropriate.

2. These Objections and Responses are made without in any way waiving or intending to waive: (i) any objections as to the competency, relevancy, materiality, privilege, or admissibility as evidence, for any purpose, of information produced in response to these Requests; (ii) the right to object on any ground to the use of the information produced in response to the Requests at any hearings or at trial; (iii) the right to object on any ground at any time to a request for further responses to the Requests; or (iv) the right at any time to revise, correct, add to, supplement, or clarify any of the objections contained herein.

3. The admissions made, or deemed to be made, herein are for the purpose of the pending action only and do not constitute an admission for any other purpose; nor may they be used against the Teva Defendants or Actavis Generic Defendants in any other proceeding.

GENERAL OBJECTIONS

1. The Teva Defendants and Actavis Generic Defendants object to these Requests to the extent they seek information that is not related to the claims asserted by Plaintiffs in this case.

2. The Teva Defendants and Actavis Generic Defendants object to these Requests to the extent they seek admissions beyond the scope of the liability-only public nuisance trial ordered by the Court pursuant to the Orders entered November 7, 2019 (Dkt. No. 1875) and December 4, 2019 (Dkt. No. 2087).

3. The Teva Defendants and Actavis Generic Defendants object to these Requests to the extent they seek information that is neither material nor necessary to any party's claims or defenses in this action.

4. The Teva Defendants and Actavis Generic Defendants object to these Requests to the extent that they purport to impose burdens or obligations on The Teva Defendants or Actavis Generic Defendants that are broader than, inconsistent with, not authorized under, or not reasonable discovery pursuant to the New York CPLR or the Rules of the Commercial Division of the Supreme Court of New York. The Teva Defendants and Actavis Generic Defendants will interpret and respond to the Requests in good faith in accordance with the applicable discovery rules.

5. The Teva Defendants and Actavis Generic Defendants object to these Requests to the extent they call for the production of information or documents that are protected from disclosure by the attorney-client privilege or the work product doctrine, or prepared in anticipation of litigation or for trial, or any other applicable privilege, protection, or immunity. The Teva Defendants and Actavis Generic Defendants do not agree to produce such information or documents, and the Teva Defendants and Actavis Generic Defendants will not interpret the Requests, or any individual Request, to call for the production of such privileged materials.

6. The Teva Defendants and Actavis Generic Defendants object to these Requests to the extent that they assume any fact, event, or legal conclusion is true or that any characterization is accurate. No response is an admission of any factual characterization or legal contention contained in any individual Request.

7. The Teva Defendants and Actavis Generic Defendants object to these Requests to the extent they call for admissions of fact that are not within the personal knowledge of the Teva Defendants or Actavis Generic Defendants.

8. The Teva Defendants and Actavis Generic Defendants object to these Requests to the extent they contain terms that are not defined and, as a result, are vague, ambiguous, or unintelligible.

9. The Teva Defendants and Actavis Generic Defendants object to these Requests because the Requests do not define the entities, Cephalon, Teva USA, Actavis Pharma, Actavis LLC or Watson Labs and it is unclear whether any individual Request concerns some or all of these entities. Unless otherwise stated, the specific responses and admissions set forth in Schedule A are solely on behalf of Teva USA and/or Cephalon and do not include their subsidiaries or affiliates. The Actavis Generic Defendants specifically adopt, as if fully set forth therein, all of the specific objections of the Teva Defendants set forth in Schedule A.

Subject to and without waiving these Reservation of Rights or General Objections, the Teva Defendants and Actavis Generic Defendants provide specific objections and responses in the attached Schedule A.

Dated: New York, New York
March 26, 2020

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ *Pamela C. Holly*

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Counsel for Defendants Cephalon, Inc., Teva Pharmaceuticals USA, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc.

VERIFICATION

I, John Hassler, state that I am the Senior Vice President and General Manager of TEVA CNS at Teva Pharmaceuticals USA, Inc. I have reviewed the foregoing Responses and Objections of Defendants Cephalon, Inc. and Teva Pharmaceuticals USA, Inc. to Plaintiffs' Second Set of Requests for Production of Documents, and I verify that, to the best of my knowledge, information and/or belief, the facts set forth therein are true and correct. Defendants Cephalon, Inc. and Teva Pharmaceuticals USA, Inc. reserve the right to make any changes should it appear that any omissions or errors have been made. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Overland Park, Kansas

Dated: March 24, 2020

John Hassler
Teva Pharmaceuticals USA, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of April, 2020, the foregoing has been served via email to all parties at:

NYOpioidPlaintiffs@simmonsfirm.com
NYOpioidAllDefendants@dechert.com

/s/ *Pamela C. Holly*
Pamela C. Holly

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
1	Teva Pharmaceuticals USA, Inc. ("Teva USA") is a Delaware corporation with its principal place of business in North Wales, Pennsylvania.		Denied. Teva Pharmaceuticals USA, Inc. ("Teva USA") is a Delaware corporation with its principal place of business in Parsippany, New Jersey.
2	Cephalon, Inc. is a Delaware corporation with its principal place of business in Frazer, Pennsylvania.		Denied. Cephalon, Inc. ("Cephalon") is a Delaware corporation with its principal place of business in Parsippany, New Jersey.
3	Teva Entities include Teva Pharmaceutical Industries, Teva Pharmaceuticals USA, Inc., and Cephalon, Inc. The term "Teva" as used herein means defendants "Teva Pharmaceuticals USA, Inc., or Cephalon, Inc., or both."	The Teva Defendants object to Plaintiffs' characterization of the "Teva Entities." The Teva Defendants object to the inclusion of "Teva Pharmaceutical Industries" because Teva Pharmaceutical Industries, Ltd. has been dismissed from this case for lack of personal jurisdiction. The Teva Defendants further object to Plaintiffs' definition of "Teva" because it is improper to group Teva USA and Cephalon for purposes of responding to Requests for Admission.	The Teva Defendants object to this RFA. There are no factual allegations that require a response.
4	Teva opioid products include (1) Actiq, and (2) Fentora.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	It is admitted that Actiq and Fentora are products that have been sold by Cephalon and/or Teva USA.
5	Teva sold Schedule II generic opioids in the United States starting in 1990's.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the term "1990's" as vague and ambiguous.	Denied.
6	Teva manufactures Actiq (fentanyl citrate) in 200, 400, 600, 800, 1200, and 1600 mcg doses.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	Denied as stated. It is admitted that Teva USA manufactures Actiq (fentanyl citrate) in 200, 400, 600, 800, 1200, and 1600 mcg doses.
7	Teva sells Actiq (fentanyl citrate) in 200, 400, 600, 800, 1200, and 1600 mcg doses.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	Denied as stated. It is admitted that Teva USA sells Actiq (fentanyl citrate) in 200, 400, 600, 800, 1200, and 1600 mcg doses.
8	Teva manufactures Fentora (fentanyl buccal) in 100, 200, 300, 400, 600, and 800 mcg doses.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	Denied. The Teva Defendants do not manufacture a 300mcg dose of Fentora.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
9	Teva sells Fentora (fentanyl buccal) in 100, 200, 300, 400, 600, and 800 mcg doses.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	Denied. The Teva Defendants do not sell a 300mcg dose of Fentora.
10	As of April 2018, Teva sold and distributed the following Schedule II generic opioid products (by generic name, and equivalent brand name in parentheses), which are accurately reflected in the spreadsheets found at TEVA_MDL_A_02315384 and TEVA_MDL_A_02315383. • Fentanyl Citrate Lozenge (Actiq) • Fentanyl Patch Reservoir (Duragesic Patch) • Fentanyl TDS (Duragesic) • Hydrocodone/APAP (acetaminophen) 10mg-325mg; 7.5mg-325mg; 5mg-325mg; and 2.5mg-325mg (Norco) • Hydrocodone/ APAP (acetaminophen) Tabs (Norco) • Hydrocodone/APAP (acetaminophen) Lo Tabs (Vicodin) • Hydrocodone/Ibuf(ibuprofen) Tabs (Vicoprofen) • Hydromorphone 10mg/ml Injection; 50mg/50ml Injection; and 30mg/5ml Injection (Dilaudid-HP) • Hydromorphone ER 32 mg; and excl.32mg Tabs (Exalgo) • Meperidine Tabs (Demerol) • Morphine Sulfate Tabs (Avinza) • Morphine Sulfate Caps (Kadian) • Morphine Sulfate ER Tabs (MS Contin) • Oxycodone 15mg/30mg Tabs; and 5mg Tabs (Roxicodone) • Oxycodone HCL CR Tabs (Oxycontin) • Oxycodone HCL ER Tabs 10, 15, 20, 30, 60 and 80mg (Oxycontin) • Oxycodone CHL Tabs (Roxicodone) • Oxycodone/APAP(acetaminophen) Tabs (Percocet) • Oxycodone/Aspirin Tabs (Percodan) • Oxycodone/Ibuprofen Tabs (Cumbunox) • Oxymorphone (Opana) • Oxymorphone HCL ER 5mg, 7.5mg, 10mg, 15mg, 20mg, 30mg and 40mg) (Opana ER)	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. Cephalon does not and has not sold generic medicines and therefore will not respond to this RFA. The Teva Defendants objects to this RFA because the term "sold and distributed" is vague and ambiguous.	The authenticity of Teva_MDL_A_02315383 and Teva_MDL_A_02315384 is admitted. Teva USA cannot attest to the accuracy of the data provided in the spreadsheets because the data is from a third-party source, IQVIA. Teva USA denies that it sold and distributed all of the medicines listed in RFA 10 as of April 10, 2018. The spreadsheets listed in RFA 10 reflect sales of Teva USA and the Actavis Generic Entities combined.
11	As of April 2018, Teva sold and distributed the following generic opioid addiction treatment products (by generic name, and equivalent brand name in parentheses), which are accurately reflected in the spreadsheets found at TEVA_MDL_A_02315384 and TEVA_MDL_A_02315383:• Buprenorphine Patch 5/10/15/20mcg (Butrans) • Buprenorphine SL Tabs (Subutex) • Buprenorphine/Naloxone Tabs (Suboxone)	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. Cephalon does not and has not sold generic medicines and therefore will not respond to this RFA. The Teva Defendants objects to this RFA because the term "sold and distributed" is vague and ambiguous.	The authenticity of Teva_MDL_A_02315383 and Teva_MDL_A_02315384 is admitted. Teva USA cannot attest to the accuracy of the data provided in the spreadsheets because the data is from a third-party source, IQVIA. Teva USA denies that is sold and distributed all of the medicines listed in RFA 11 as of April 10, 2018. The spreadsheets listed in RFA 11 reflect sales of Teva USA and the Actavis Generic Entities combined.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
12	The chart at TEVA_MDL-A_02419959 accurately reflects the product names, types, strengths, forms, sizes, NDCs, date of first Teva sale, entitie(s) the product was acquired from (if any), and the DEA Schedule listing for each of Teva's opioid products referenced therein.	The Teva Defendants object to this request to the extent it is compound, vague, ambiguous and/or otherwise unclear as to the matters for which Plaintiffs seek an admission. The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	The authenticity of Teva_MDL_A_02419959 is admitted. Plaintiffs' characterizations of the document are denied and cannot be answered in the aggregate.
13	On March 23, 2004, the FDA approved Teva's abbreviated application for the approval of Oxycodone Hydrochloride Extended-release Tablets, 80 mg (ANDA 76-168).	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. Cephalon does not and has not sold generic medicines and therefore will not respond to this RFA.	Admitted.
14	On August 29, 2006, Teva announced it had signed an agreement with The Purdue Frederick Company and certain of its affiliates to settle patent infringement litigation pertaining to Teva's generic version of Purdue's OxyContin® (oxycodone HCl extended-release) Tablets pending in the United States District Court for the Southern District of New York. The agreement involved a full release of Teva, as well as its distributors, purchasers, and patients, and called for Teva to cease selling its oxycodone products at a future date upon certain contingencies.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. Cephalon does not and has not sold generic medicines and therefore will not respond to this RFA.	Admitted.
15	As of March 6, 2007, Teva was still selling a generic version of OxyContin tablets. On that date, Teva announced "it will continue to sell its generic version of OxyContin tablets at least through the end of 2007."	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. Cephalon does not and has not sold generic medicines and therefore will not respond to this RFA.	Admitted.
16	On November 4, 1998, the FDA approved Actiq for the management of breakthrough cancer pain in patients with malignancies who are already receiving and who are tolerant to opioid therapy for their underlying persistent cancer pain.		Admitted.
17	The FDA's November 4, 1998 Actiq approval letter states "Please note that the attached Risk Management Program (RMP) is an integral part of the approved NDA for this product and is an essential component of the terms of this NDA's approval by FDA for marketing this product in the United States."	The Teva Defendants object to this Request because Plaintiffs have failed to furnish a copy, or provide a bates number, for the document referenced in RFA 17 as is required by CPLR 3123(a).	The Teva Defendants cannot attest to the accuracy or authenticity of the document referenced in RFA 17 prior to Plaintiffs furnishing a copy of the document pursuant to CPLR 3123(a).
18	Anesta Corporation started selling Actiq in the United States in 1999.		Admitted.
19	The FDA approved a February 9, 1999 revised Actiq Risk Management Program submitted by Anesta to the FDA on February 10, 1999.	The Teva Defendants object to this Request because Plaintiffs have failed to furnish a copy, or provide a bates number, for the document referenced in RFA 19 as is required by CPLR 3123(a).	The Teva Defendants cannot attest to the accuracy or authenticity of the document referenced in RFA 19 prior to Plaintiffs furnishing a copy of the document pursuant to CPLR 3123(a).

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
20	On October 10, 2000, Teva acquired Anesta Corporation for $444 million, which included the rights to market and distribute Actiq.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to this Request to the extent the acquisition price is not relevant and not material to any party's claims and defenses and to the extent it seeks admissions beyond the liability only public nuisance trial.	RFA 20 is denied as to Teva USA. It is admitted only that Cephalon acquired Anesta Corporation on October 10, 2000.
21	A new version of the Actiq Risk Management Plan dated August 1, 1999 added Cephalon as a Sponsor along with its subsidiary Anesta Corporation.	The Teva Defendants object to this Request because Plaintiffs have failed to furnish a copy, or provide a bates number, for the document referenced in RFA 21 as is required by CPLR 3123(a).	The Teva Defendants cannot attest to the accuracy or authenticity of the document referenced in RFA 21 prior to Plaintiffs furnishing a copy of the document pursuant to CPLR 3123(a).
22	No further revisions to the Actiq Risk Management Plan were approved by the FDA after Actiq Risk Management Plan dated August 1, 1999.	The Teva Defendants object to the term "Actiq Risk Management Plan" as vague and ambiguous. The Teva Defendants further object to RFA 22 because it mischaracterizes the progression of the Actiq risk management procedures.	Denied.
23	On September 25, 2006, the FDA approved Fentora for the management of breakthrough pain in patients with cancer who are already receiving and who are tolerant to opioid therapy for their underlying persistent cancer pain.		Admitted.
24	The FDA provided a Fentora Risk Minimization Plan Summary attached to its September 25, 2006 Fentora approval letter at TEVA_MD L_A_ 02074924, pp. 966-968.		Admitted.
25	The full operative Fentora Risk Management Plan approved by the FDA is attached to Penny Levin's letter to the FDA dated September 19, 2019 (TEVA_MD L_A_ 02074924 to 69), which was referenced and approved in the FDA's September 25, 2006 Fentora approval letter.		Denied. The full operative Fentora Risk Management Plan is not included in the document referenced by Plaintiffs, Teva_MDL_A_02074924 to 69.
26	Teva started selling Fentora in the United States in 2006.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	Denied as to Teva USA. Cephalon admits that it started selling Fentora in the United States after its FDA approval on September 25, 2006.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
27	On September 12, 2008, the FDA informed Cephalon that its application to expand the Fentora indication for the use for the use of Fentora for the management of breakthrough pain in patients who are already regularly taking around-the-clock opioid medicine for their underlying persistent pain was not approvable.	The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a).	Denied.
28	On December 28, 2011, the FDA approved of a Risk Evaluation Mitigation Strategy (REMS) for Actiq.		Admitted.
29	On December 28, 2011, the FDA approved of a Risk Evaluation Mitigation Strategy (REMS) for Fentora.		Admitted.
30	In 1951, Teva Pharmaceuticals Industries Ltd. ("Teva Ltd.") began trading on the Tel Aviv Stock Exchange as the Teva Middle East Pharmaceutical Chemical Works Company Ltd.	The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	
31	In 1976, the union of Teva Ltd., Assia and Zori created Israel's largest drug maker. At this point, the combined company was first called Teva Pharmaceutical Industries Ltd.	The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
32	In 1979 Teva established its corporate offices in Petah Tikva, Israel.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. To the extent this Request seeks information about Teva Ltd., The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	Denied.
33	From 1980 to 1990, Teva expanded internationally, capitalizing on the passing of the Hatch-Waxman Act (in 1984) to enter the US market in the generics sector.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. To the extent this Request seeks information about Teva Ltd., The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	Denied.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
34	In 1985, Teva expanded its U.S. market share through a 50-50 joint venture with W.R. Grace to form TAG Pharmaceuticals. The joint company acquired Lemmon Pharmacal Company in Sellersville, PA, facilitating Teva's entry into the U.S. market.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. To the extent this Request seeks information about Teva Ltd., The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, the Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	Denied.
35	In 1987, Teva began trading on NASDAQ, marking the start of a period of robust growth.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. To the extent this Request seeks information about Teva Ltd., The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, the Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	Denied.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
36	From 1990 to 2000, Teva invested in a series of acquisitions that extended its global reach in the U.S. and Europe, and the company assumed leadership of the U.S. generics sector.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. To the extent this Request seeks information about Teva Ltd., The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	Denied.
37	In 1992, Teva purchased W.R. Grace's 50% share of TAG Pharmaceuticals and became full owner. Together with Lemmon Pharmacal Company, this created Teva Pharmaceuticals USA, Inc. (Teva USA")	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. To the extent this Request seeks information about Teva Ltd., The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	Denied.
38	Teva USA is an indirect subsidiary of Teva Ltd.		Admitted.
39	In January 2006, Teva Ltd. completed the acquisition of Ivax Corporation for $7.4 billion.	The Teva Defendants object to this Request to the extent the acquisition price is not relevant and not material to any party's claims and defenses and to the extent it seeks admissions beyond the liability only public nuisance trial.	Admitted.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
40	Upon the acquisition, Teva USA began selling Ivax's generic opioid products including Guiatuss AC Syryp, CV (Sugar Free)and Tramadol/ Acetaminophen tablets.		Admitted.
41	Ivax is now an indirect subsidiary of Teva Ltd., and a direct subsidiary of Teva USA.		Admitted.
42	In December 2008, Teva Ltd. completed the acquisition of Barr Pharmaceuticals, Inc. for $7.46 billion plus the assumption of net debt of approximately $1.5 billion.	The Teva Defendants object to this Request to the extent the acquisition price is not relevant and not material to any party's claims and defenses and to the extent it seeks admissions beyond the liability only public nuisance trial.	Admitted.
43	Upon the December 2008 acquisition, Teva USA began selling Barr's generic opioid products including acetaminophen with codeine.		Admitted.
44	Barr Pharmaceuticals is now an indirect subsidiary of Teva Ltd. and a direct subsidiary of Teva USA.		Admitted.
45	In October 2011, Teva Ltd. completed the acquisition of Defendant Cephalon, Inc. for $6.8 billion.		Admitted.
46	Upon the October 2011 acquisition, Teva began selling Cephalon's name-brand opioid products (Actiq and Fentora) in October 2011.		It is admitted that following the October 2011 acquisition Teva USA began selling Cephalon's name brand opioid products (Actiq and Fentora).
47	Cephalon is an indirect subsidiary of Teva Ltd.		Admitted.
48	In August 2016, Teva Ltd. completed the acquisition of Allergan's worldwide generic pharmaceuticals business (Actavis) for $40.5 billion.	The Teva Defendants object to this Request to the extent the acquisition price is not relevant and not material to any party's claims and defenses and to the extent it seeks admissions beyond the liability only public nuisance trial.	Denied. The Actavis Generic Entities are subsidiaries of Actavis Holdco US, Inc., whose shares were acquired by Teva USA, an indirect subsidiary of Teva Ltd., as part of Allergan plc's 2016 sale of its generic business.
49	Teva Ltd.'s August 2016 acquisition of Allergan plc's worldwide generic pharmaceuticals business included Defendants Actavis LLC; Actavis Pharma, Inc. f/k/a Watson Pharma, Inc.; Watson Laboratories, Inc.; Actavis Laboratories FL, Inc.; Actavis Totowa LLC; Actavis Elizabeth LLC; Actavis Mid-Atlantic LLC; Actavis Laboratories UT, Inc.		Denied. Actavis Laboratories FL, Inc.; Actavis Totowa LLC; Actavis Elizabeth LLC; Actavis Mid-Atlantic LLC; Actavis Laboratories UT, Inc. are not Defendants in this action.
50	Defendants Actavis LLC; Actavis Pharma, Inc. f/k/a Watson Pharma, Inc.; Watson Laboratories, Inc.; Actavis Laboratories FL, Inc.; Actavis Totowa LLC; Actavis Elizabeth LLC; Actavis Mid-Atlantic LLC; Actavis Laboratories UT, Inc. are indirect subsidiaries of Teva Ltd. and indirect subsidiaries of Teva USA.		Denied. Actavis Laboratories FL, Inc.; Actavis Totowa LLC; Actavis Elizabeth LLC; Actavis Mid-Atlantic LLC; Actavis Laboratories UT, Inc. are not Defendants in this action.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
51	The Excel spreadsheet, Sheet 3, at ALLERGAN_MDL_03367178 accurately reflects U.S. generic products that were included in Teva's purchase of the Actavis generic business from Allergan in August 2016.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, the Request seeks admissions about non-opioid products.	Based on the bates number, Allergan_MDL_03367178 is a document that was created by Allergan and produced by Allergan in the course of litigation. The Teva Defendants cannot attest to the accuracy of this document in the aggregate.
52	In October 2016, Teva Ltd. completed the acquisition of Anda, Inc. for $500 million from Allergan.	Anda, Inc. is represented by separate counsel and requests for admission concerning Anda, Inc. should be directed to Anda, Inc. and its counsel. To the extent this RFA is directed at Teva Ltd, the Teva Defendants object because Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	
53	Anda, Inc. is an indirect subsidiary of Teva Ltd.	Anda, Inc. is represented by separate counsel and requests for admission concerning Anda, Inc. should be directed to Anda, Inc. and its counsel. To the extent this RFA is directed at Teva Ltd, the Teva Defendants object because Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
54	The Excel Spreadsheet at TEVA_MDL_A_09655245 accurately reflects the generic products for companies acquired by Teva.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, the Request seeks admissions about non-opioid products.	The authenticity of Teva_MDL_A_09655245 is admitted. Plaintiffs' characterization of the document is denied.
55	Teva Ltd. reported $18.854 billion in revenue worldwide in 2018.	The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	
56	Teva Ltd. reported $8.296 billion in gross profit worldwide in 2018.	The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
57	Teva Ltd. reported $9.297 billion in revenues in 2018 for its North American Segment.	The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	
58	Teva Ltd. reported gross profit of $2.837 billion in 2018 for its North American Segment.	The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	
59	Teva Ltd. reported $22.4 billion in revenue worldwide in 2017.	The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
60	Teva Ltd. reported $10.8 billion in gross profit worldwide in 2017.	The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	
61	Teva Ltd. reported $21.9 billion in revenue worldwide in 2016.	The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	
62	Teva Ltd. reported $11.9 billion gross profit worldwide in 2016.	The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
63	Teva Ltd. reported $19.7 billion in revenue worldwide in 2015.	The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	
64	Teva Ltd. reported $11.4 billion in gross profit worldwide in 2015.	The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	
65	Teva Ltd. reported $20.3 billion in revenue worldwide in 2014.	The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
66	Teva Ltd. reported $11.1 billion in gross profit worldwide in 2014.	The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	
67	Teva Ltd. reported $20.3 billion in revenue worldwide in 2013.	The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	
68	Teva Ltd. reported $10.7 billion in gross profit worldwide in 2013.	The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
69	Teva is No. 1 in generic sales worldwide.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to this Request because the terms "No. 1," "generic sales," and "worldwide" are undefined and vague and ambiguous. To the extent this Request seeks information about Teva Ltd., the Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	
70	Teva is No. 1 in total prescriptions in the U.S.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to this Request because the terms "No. 1" and "total prescriptions" are vague and ambiguous. The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses.	

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
71	As of 2017, 1 in 6 prescriptions in the U.S. were filled with Teva medicines.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses.	
72	Teva produced 120 billion tablets and capsules in 2018.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to this Request because the Request does not specify the geographic scope of the Request. The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses.	
73	Valli Baldassano worked for Cephalon from 2007 to 2011.		Admitted.
74	From 2007 to 2011, Baldassano was the Executive Vice President and Chief Compliance Officer at Cephalon.		Admitted.
75	Deborah Bearer began working at Cephalon in 2003 and at Teva, following Teva's acquisition of Cephalon in 2011. As of September 25, 2019, Bearer still works for Teva.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	It is admitted that Deborah Bearer began working at Cephalon in 2003 and continued to work at Teva USA following Cephalon's acquisition in 2011. It is admitted that as of September 25, 2019 Bearer still works for Teva USA.
76	Since January 2019, Bearer has been the Senior Director for Global Market Access. From 2011 to 2019, Bearer was Director of Health Systems Marketing, and from 2003 to 2011, she was the Director of Managed Markets Marketing.		Admitted.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
77	Stacey Beckhardt worked at Teva from 2001 to 2012.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	It is admitted that Stacey Beckhardt worked at Cephalon starting in approximately 2001 and continued to work at Teva USA following Cephalon's acquisition in 2011 for approximately six months.
78	During the time of 2001 to 2012, Beckhardt worked as Senior Manager, Product Communications.		Denied.
79	Andy Boyer began working at Actavis in 1998 and, following Teva's acquisition of the Acquired Actavis Entities, continued working at Teva until 2018.	The Teva Defendants object to the term "Actavis" as vague and ambiguous. The Teva Defendants object to the term "Acquired Actavis Entities" as undefined and, therefore, vague and ambiguous. The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	It is admitted that Andy Boyer began working at Watson Pharma, Inc. in 1998. It is further admitted that Mr. Boyer worked for Teva USA from August 2016 until February 2018.
80	Boyer worked as the President and CEO of North American Generics at Teva from 2016 to 2018.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	It is admitted that Boyer worked as the President and CEO of North America Generics at Teva USA from August 2016 until February 2018.
81	David Brennan worked for Cephalon from 2002 to 2004.		It is admitted that David Brennan worked for Cephalon from March 2002 to February 2004.
82	From 2002 to 2004, Brennan worked as a Compliance Auditor.		It is admitted that from March 2002 to February 2004, Brennan worked as a Compliance Auditor.
83	Cynthia Condodina began working at Cephalon in 2005 and, as of September 25, 2019, continues to work with Teva following Teva's acquisition of Cephalon in 2011.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	It is admitted that Cynthia Condodina began working at Cephalon in November of 2005. It is admitted that as of September 25, 2019 she continued to work at Teva USA. It is denied that Ms. Condodina currently works at Teva USA.
84	From 2010 to 2014, Condodina was Associate Director in Oncology Sales Training and Development at Teva. Condodina was a Senior Product Manager in the Pain Care Franchise from 2007 to 2010. From 2007 to 2009, Condodina worked at Cephalon as a Product Manager in the Pain Care Franchise.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	It is admitted that from 2010 to 2014, Condodina was Associate Director in Oncology Sales Training and Development at Cephalon and then Teva USA. Condodina was a Senior Product Manager in the Pain Care Franchise from 2007 to 2010 at Cephalon. From 2007 to 2009, Condodina worked at Cephalon as a Product Manager in the Pain Care Franchise.
85	Matthew Day began working at Cephalon in 2007 and continued with Teva, following Teva's acquisition of Cephalon in 2011, until 2018.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	It is admitted that Matthew Day began working at Cephalon in July of 2007 and then worked at Teva USA following the acquisition of Cephalon in 2011, until 2018.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
86	From 2012 to 2018, Day was Director of Marketing for CNS/Migraine-Pain Care. Day was Area Field Sales Manager for the Pain Care Division from 2010 to 2012. Day worked as Senior Manager of Sales Training in the Pain Care Division from 2007 to 2010.		Admitted.
87	Teva designated John Hassler as its Rule 30(b)(6) designee in the proceeding In Re National Prescription Opiate Litigation, Case No. 17-md-2804.		Admitted.
88	John Hassler is currently employed as the Senior Vice President and General Manager of Teva CNS.		Admitted.
89	Teva Ltd. designated Doron Herman as its Rule 30(b)(6) designee in the proceeding In Re National Prescription Opiate Litigation, Case No. 17-md-2804.	The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	
90	Herman is currently employed as the Senior Vice President, Head of Global Tax for Teva Ltd.	The Teva Defendants object to this Request to the extent it seeks admissions outside the permissible scope of CPLR 3123(a). The Teva Defendants object to this Request to the extent it seeks admissions beyond the scope of the liability-only public nuisance trial ordered by the Court. The Teva Defendants object to this Request to the extent it seeks information that is not relevant or not material to any party's claims or defenses. Specifically, Teva Ltd. is not a defendant in this case. The Court has dismissed Teva Ltd. for lack of personal jurisdiction. Dkt. 2069.	
91	Kevin Kreutzer began working for Teva on January 7, 2013 and was terminated on April 1, 2013.		Admitted.
92	From January 1, 2013 to April 1, 2013, Kreutzer worked as Diversion Operations Manager.		Admitted.
93	Carol Marchione began working at Cephalon in 2000 and, following Teva's acquisition of Cephalon in 2011, continued working for Teva until 2013.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	It is admitted that Carol Marchione began working at Cephalon in July of 2000 and, following Cephalon's acquisition in 2011, continued working for Teva USA until April 2013.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
94	From 2000 to 2013, Marchione worked as the Senior Director of Regulatory Affairs.		Denied as stated. It is admitted that from 2000 to 2013, Marchione worked as either a Director or Senior Director of Regulatory Affairs.
95	Colleen McGinn began working at Cephalon in 2004 and, following Teva's acquisition of Cephalon in 2011, worked for Teva until 2019.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	It is admitted that Colleen McGinn began working at Cephalon in 2004 and, following Cephalon's acquisition in 2011, worked for Teva USA until July 2019.
96	McGinn worked as the Senior Director of DEA Compliance from 2015 to 2019. From 2012 to 2015, McGinn was Director of DEA compliance, and from 2004 to 2012, she worked as Associate Director of Corporate Controlled Substances.		Admitted.
97	Michael Morreale worked at Cephalon from 1998 to 2011 and, following Teva's acquisition of Cephalon in 2011, continued working for Teva.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	It is admitted that Michael Morreale worked at Cephalon from 1998 to 2011 and, following Cephalon's in 2011, continued working for Teva USA.
98	As of September 25, 2019, Morreale continues to work for Teva as a Regional Sales Manager. From 2001 to 2011, Morreale worked as an Area Sales Manager at Cephalon.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	It is admitted that as of September 25, 2019, Morreale continues to work for Teva USA as a Regional Sales Manager. From 2001 to 2011, Morreale worked as an Area Sales Manager at Cephalon.
99	Andrew Pyfer began working at Cephalon in 2000 and continued until 2010.		It is admitted that Andrew Pyfer began working at Cephalon in 2000 and continued until February 2010.
100	Pyfer worked as National Sales Director for Primary Care Sales from 2008 to 2010. From 2007 to 2008, Pyfer was National Sales Director for the Pain Franchise. From 2005 to 2006, Pyfer worked as Senior Group Marketing Director for the Pain Franchise.		Admitted.
101	Laura Sippial worked at Cephalon from 2001 to 2010.		Admitted.
102	While at Cephalon, Sippial worked as an Executive Sales Representative from 2001 to 2010.		Admitted.
103	Randy Spokane began working at Cephalon in 2001 and, following Teva's acquisition of Cephalon in 2011, continued with Teva until 2017.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	It is admitted that Randy Spokane began working at Cephalon in 2001 and, following Cephalon's acquisition in 2011, continued with Teva USA until 2017.
104	From 2010 to 2016, Spokane was the National Sales Director of the Pain Care Division. Spokane worked as the Regional Sales Director for the Pain Care Division – East from 2005 to 2007, and from 2008 to 2010.		Admitted.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
105	Terrence Terifay worked at Cephalon from 2004 to 2009.		It is admitted that Terrence Terifay worked at Cephalon from February 2004 until April 2009.
106	From 2004 to 2009, Terifay was Group Director of Marketing.		Admitted.
107	Joseph Tomkiewicz began working at Teva in 2014 and, as of September 25, 2019, continues to work at Teva.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	It is admitted that Joseph Tomkiewicz began working at Teva USA in 2014 and, as of September 25, 2019, continues to work at Teva USA.
108	Since 2014, Tomkiewicz has worked as the Diversion Operations Manager.		Admitted.
109	Documents TEVA_MDL_A_05339841 and TEVA_MDL_A_02759499 reflect Cephalon's 2000 marketing budget for Actiq was $12.2 million dollars.		Admitted.
110	Document TEVA_MDL_A_05711361 reflects Cephalon's 2001 proposed marketing proposed marketing budget was $9,878,500 million dollars.	The Teva Defendants object to this Request as confusing.	Admitted.
111	Document TEVA_MDL_A_00454816 reflects Cephalon's 2002 Actiq tactical budget was $6 million dollars.		Admitted.
112	Document TEVA_CHI_00042882 reflects Cephalon's 2003 Actiq tactical budget was $17.7 million dollars.		Admitted.
113	Document TEVA_CHI_00042951 reflects Cephalon's 2004 Actiq tactical budget was $34,660,000 million dollars.		Admitted.
114	Document TEVA_CHI_00043010 reflects Cephalon's 2005 Actiq tactical budget was $27.3 million dollars.		Admitted.
115	Document TEVA_MDL_A_01478114 reflects Cephalon's 2006 Actiq budget summary totaled $7.767 million dollars.		Admitted.
116	Document TEV_FE00017484 reflects Cephalon's FEBT only expenditures totaled $13.6 million dollars.		It is admitted that Tev_FE00017484 reflects an FEBT budget of $13.6 million for 2006.
117	Document TEVA_MDL_A_01478114 reflects Cephalon's 2006 FEBT budget summary totaled $16.8 million dollars.		Admitted.
118	Document TEVA_MDL_A_00364486 reflects Cephalon's 2007 Executive Summary budget totaled $28 million dollars.		Admitted.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
119	Document TEVA_FE00036312 reflects Cephalon's Executive Summary total marketing budget was $18.5 million dollars.		It is admitted that the Tev_FE0003631 reflects Cephalon's Executive Summary total marketing budget of $18.5 million for 2008.
120	Document TEV_FE00016993 reflects Cephalon's 2009 marketing budget was $20 million dollars.		Admitted.
121	Document TEVA_MDL_A_08657218 reflects Cephalon's 2015 Pain Matters budget was $998,750 dollars.		Admitted.
122	Gross sales of Actiq totaled $5 million in 1999.	The Teva Defendants object to this Request because it seeks information outside of its personal knowledge.	Based on its reasonable investigation to date, the Teva Defendants have not been able to confirm or deny the accuracy of Request 122.
123	Gross sales of Actiq totaled $16 million in 2000.		Admitted.
124	Gross sales of Actiq totaled $55 million in 2001.		Admitted.
125	Gross sales of Actiq totaled $133.3 million in 2002.		Admitted.
126	Gross sales of Actiq totaled $254.4 million in 2003.		Admitted.
127	Gross sales of Actiq totaled $365.9 million in 2004.		Admitted.
128	Gross sales of Actiq totaled $448.9 million in 2005.		Admitted.
129	Gross sales of Actiq totaled $590.7 million in 2006.		Admitted.
130	In 2006 Cephalon lost its patent protection for Actiq, and competing generic Actiq products entered the market.		Admitted.
131	According to a Cephalon 2006 market research report, the following conditions were treated with Actiq and their relative percentages were: Back 38%; Neuropathic 22%; Headache 14%; Cancer 8%; and Arthritis 6%.	The Teva Defendants object to this Request because Plaintiffs have failed to furnish a copy, or provide a bates number, of the document referenced in RFA 131 as is required by CPLR 3123(a).	The Teva Defendants cannot attest to the accuracy or authenticity of the document referenced in RFA 131 prior to Plaintiffs furnishing a copy of the document pursuant to CPLR 3123(a).
132	According to the same Cephalon 2006 market research report, the use for all opioid products for chronic pain was Back 32%; Neuropathic 30%; Arthritis 21%; Cancer 12%; and Headache 5%.	The Teva Defendants object to this Request because Plaintiffs have failed to furnish a copy, or provide a bates number, of the document referenced in RFA 132 as is required by CPLR 3123(a).	The Teva Defendants cannot attest to the accuracy or authenticity of the document referenced in RFA 132 prior to Plaintiffs furnishing a copy of the document pursuant to CPLR 3123(a).

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
133	As of September 2006, 36% of Actiq prescribers were primary care providers (PCP); 32% were pain specialists (Pain); 6% were neurologists (Neuro); and 6% were oncologists (Onc); and 20% were other specialties (Other).	The Teva Defendants object to this Request because Plaintiffs have failed to furnish a copy, or provide a bates number, of the document referenced in RFA 133 as is required by CPLR 3123(a).	The Teva Defendants cannot attest to the accuracy or authenticity of the document referenced in RFA 133 prior to Plaintiffs furnishing a copy of the document pursuant to CPLR 3123(a).
134	As of November 2006, 52% of Fentora prescribers were pain specialists (Pain); 18% were primary care providers (PCP); 6% were neurologists (Neuro); 5% were oncologists (Onc); and 19% were other specialties (Other).	The Teva Defendants object to this Request because Plaintiffs have failed to furnish a copy, or provide a bates number, of the document referenced in RFA 134 as is required by CPLR 3123(a).	The Teva Defendants cannot attest to the accuracy or authenticity of the document referenced in RFA 134 prior to Plaintiffs furnishing a copy of the document pursuant to CPLR 3123(a).
135	On September 29, 2008, the U.S. Department of Justice announced that Cephalon would enter into a criminal plea and pay $425 million in settlement to resolve claims it marketed Actiq and two other drugs off-label for uses not approved by the Food and Drug Administration.	The Teva Defendants object to this Request for Admission because it is misleading and for lack of completeness. The Teva Defendants further object to this Request to the extent it seeks admissions regarding inadmissible hearsay. Specifically, an announcement from the U.S. Department of Justice.	It is admitted that in September 2008 Cephalon entered a Guilty Plea Agreement and agreed to pay $425 million in settlement to resolve claims relating to the promotion of Actiq and two other drugs between January 2001 and October 1, 2001. The plea agreement and settlement agreement speak for themselves and Plaintiffs' characterizations of those documents are denied.
136	Cephalon paid the $425 million settlement amount reflected in its September 2008 settlement to resolve claims it marketed Actiq and two other drugs off-label for uses not approved by the Food and Drug Administration.	The Teva Defendants object to this Request for Admission because it is misleading and for lack of completeness.	It is admitted that in September 2008 Cephalon agreed to pay $425 million in settlement to resolve claims relating to the promotion of Actiq and two other drugs between January 2001 and October 1, 2001. The settlement agreement speaks for itself and Plaintiffs' characterizations of that document are denied.
137	In September 2008, Cephalon entered into a guilty plea agreement under Federal Rule of Criminal Procedure 11(c)(1)(C) concerning its marketing of Actiq and two other drugs off-label for uses not approved by the Food and Drug Administration.	The Teva Defendants object to this Request for Admission because it is misleading and for lack of completeness.	It is admitted that in September 2008 Cephalon entered a Guilty Plea Agreement concerning the promotion of Actiq and two other drugs between January 2001 and October 1, 2001. The plea agreement speaks for itself and Plaintiffs' characterizations of that document are denied.
138	On September 29, 2008, the U.S. Government submitted its "Government's Memorandum for Entry of Plea and Sentencing" and Attachment A (Information) with information to assist the Court with the entry of Cephalon's guilty plea.		Admitted.
139	Contemporaneously with Cephalon's settlement and with the U.S. Government, Teva entered into a Corporate Integrity Agreement (CIA) with the Office of lnspector General (OIG) of the United States Department of Health and Human Services (HHS) to promote compliance with the statutes, regulations, and written directives of Medicare, Medicaid, and all other Federal health care programs (as defined in 42 U.S.C. § 1320a-7b(t)) (Federal health care program requirements) and with the statutes, regulations, and written directives of the Food and Drug Administration.		Admitted.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
140	The May 30, 2018 email from Sharyn Albrecht, Teva's Market Insights Analyst, with subject "IQVIA MARKET SHARE DATA – WEEKLY & MONTHLY MARKET SAHRE REPORTS" (TEVA_MDL_A_02315383), attaches true and correct copies of the following Excel spreadsheets from Teva's files with data received from IQVIA: "Generic Weekly Tracking Report WE 5-18-18.xlsx; Monthly Market Share Detail 4-18.xlxs" (TEVA_MDL_A_02315384 and TEVA_MDL_A_02315383). These files were "the latest files with the most current weekly (week ending 5/18/18) and monthly data (April 2018)" at the time of Ms. Albrecht's email.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	Admitted. For clarification, the files referenced in RFA 140 reflect data received by Teva USA.
141	The Excel spreadsheet Bates-numbered Teva_MDL_A_02315384 accurately reflects IQVIA's data received by Teva of Teva's weekly market shares and TRX Extended Units sold for the "Market Basket" of products referenced in the first column for the weeks ending February 23, 2018 to the week ending May 18, 2018.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	The authenticity of Teva_MDL_A_02315384 is admitted. It is further admitted that the spreadsheet reflects data received by Teva USA from IQVIA. The document and data reflected in the spreadsheet speak for themselves and Plaintiffs' characterization of the data is denied.
142	Prior to August 1, 2014, Teva Pharmaceuticals USA, Inc. ("Teva USA") had no written formal Standard Operating Procedures or Official Guidelines for the operation of an SOM program.	The Teva Defendants object to this Request because the terms "written formal Standard Operating Procedures," "Official Guidelines," and "SOM program" are vague and ambiguous.	
143	Teva USA SOP-8277 ("Suspicious Order Monitoring - DEA Order Holds," Bates Nos. TEVA_MDL_02660892 to TEVA_MDL_02660899) had an Effective Date of August 1, 2014, and was written/revised by Matthew Benkert/Joe Tomkiewicz and approved and signed by Colleen McGinn.		Admitted.
144	Teva USA SOP-8277, Rev. 1 ("Suspicious Order Monitoring - DEA Order Holds," Bates Nos. TEVA_MDL_A_01158453 to TEVA_MDL_A_01158462) were revised with an Effective Date of June 18, 2018, and were approved by Colleen McGinn on February 19, 2018 and by Valerie Hanning on February 22, 2018, and were released by Jamie Ramos on June 7, 2018.		Admitted.
145	Teva USA SOP-8277, Rev. 1 ("Suspicious Order Monitoring - DEA Order Holds," Bates Nos. TEVA_MDL_A_01158453 to TEVA_MDL_A_01158462) remains in effect as of September 25, 2019.		Admitted.
146	SOP-8277 and its 2018 revisions were and remain applicable to the distribution of Teva USA and Cephalon controlled substances including their opioid products, and to the distribution of the Teva-Acquired Actavis Generic Entities' controlled substances after their acquisition in August 2016.		Admitted.
147	Teva USA SOP-8278 ("Suspicious Order Monitoring – Do Not Ship List," Bates Nos. TEVA_MDL_A_01061094 to TEVA_MDL_A_01061098) had an Effective Date of August 1, 2014, and was written/revised by Joseph Tomkiewicz and approved and signed by Colleen McGinn.		Admitted.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
148	Teva USA SOP-8278, Rev. 1 ("Suspicious Order Monitoring – Do Not Ship List," Bates Nos. TEVA_MDL_A_01158463 to TEVA_MDL_A_01158469) were revised with an Effective Date of June 18, 2018, and were approved by Colleen McGinn on February 19, 2018 and by Valerie Hanning on February 22, 2018, and were released by Jamie Ramos on June 7, 2018.		Admitted.
149	Teva USA SOP-8278, Rev. 1 ("Suspicious Order Monitoring - DEA Order Holds," Bates Nos. TEVA_MDL_A_01158463 to TEVA_MDL_A_01158469) remains in effect as of September 25, 2019.		Admitted.
150	SOP-8278 and its 2018 revisions were and remain applicable to the distribution of Teva USA and Cephalon controlled substances including their opioid products, and to the distribution of the Teva-Acquired Actavis Generic Entities' controlled substances after their acquisition in August 2016.		Admitted.
151	Teva USA SOP-8279 ("Suspicious Order Monitoring – Customer Due Diligence," Bates Nos. TEVA_MDL_02660918 to TEVA_MDL_02660924) had an Effective Date of August 1, 2014, and was written/revised by Matthew Benkert/Joseph Tomkiewicz and approved and signed by Colleen McGinn.		Admitted.
152	Teva USA SOP-8279, Rev. 1 ("Suspicious Order Monitoring – Customer Due Diligence," Bates Nos. TEVA_MDL_A_01158470 to TEVA_MDL_A_01158478) were revised with an Effective Date of June 18, 2018, and were approved by Colleen McGinn on February 19, 2018 and by Valerie Hanning on February 22, 2018, and were released by Jamie Ramos on June 7, 2018.		Admitted.
153	Teva USA SOP-8279, Rev. 1 ("Suspicious Order Monitoring – Customer Due Diligence," Bates Nos. TEVA_MDL_A_01158470 to TEVA_MDL_A_01158478) remains in effect as of September 25, 2019.		Admitted.
154	SOP-8279 and its 2018 revisions were and remain applicable to the distribution of Teva USA and Cephalon controlled substances including their opioid products, and to the distribution of the Teva-Acquired Actavis Generic Entities' controlled substances after their acquisition in August 2016.		Admitted.
155	Teva USA SOP-8280 ("Suspicious Order Monitoring – Customer Site Visits," Bates Nos. TEVA_MDL_02660932 to TEVA_MDL_02660937) had an Effective Date of August 1, 2014, and was written/revised by Joseph Tomkiewicz and approved and signed by Colleen McGinn.		Admitted.
156	Teva USA SOP-8280, Rev. 1 ("Suspicious Order Monitoring – Customer Site Visits," Bates Nos. TEVA_MDL_A_01158479 to TEVA_MDL_A_01158490) were revised with an Effective Date of June 18, 2018, and were approved by Colleen McGinn on February 19, 2018 and by Valerie Hanning on February 22, 2018, and were released by Jamie Ramos on June 7, 2018.		Admitted.
157	Teva USA SOP-8280, Rev. 1 ("Suspicious Order Monitoring – Customer Site Visits," Bates Nos. TEVA_MDL_A_01158479 to TEVA_MDL_A_01158490) remains in effect as of September 25, 2019.		Admitted.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
158	SOP-8280 and its 2018 revisions were and remain applicable to the distribution of Teva USA and Cephalon controlled substances including their opioid products, and to the distribution of the Teva-Acquired Actavis Generic Entities' controlled substances after their acquisition in August 2016.		Admitted.
159	In 2012, Teva retained an outside consultant, Ronald Buzzeo and Cegedim Compliance Solutions and others, to conduct an on site review and assessment of Teva's then current SOM system.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the term "retained" as vague and ambiguous.	Admitted.
160	On September 25, 2012, Ronald Buzzeo wrote to Teva's DEA Compliance Manager, Colleen McGinn, enclosing a report of the findings and recommendations from the on site review and assessment of Teva's SOM system (TEVA_MDL_A_01060005 to 12).	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	Admitted.
161	At the time of the report, Teva had approximately 200 active customers, including major distributors (Amerisource Bergen, Cardinal Health, and McKesson); major pharmacy chains (such as CVS and Walgreens), grocery store chains (such as Kroger and Winn-Dixie), and individual distributors.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the term "customers" because it is vague and ambiguous.	The authenticity of Teva_MDL_A_01060005 is admitted. The document speaks for itself and Plaintiffs' characterizations of the report or its findings are denied.
162	Mr. Buzzeo's September 25, 2012 letter to Ms. McGinn states, in part, "As noted in the report, Teva has a rudimentary SOM system with a process for opening new accounts and pending orders pursuant to calculations performed by a computer program known as SORDS (Suspicious ORDerS)."	The Teva Defendants object to RFA 162 to the extent it seeks the admission of inadmissible hearsay.	The authenticity of Teva_MDL_A_01060005 is admitted. Teva USA further admits that the quoted language in RFA 162 is accurate.
163	Teva's current suspicious order monitoring system is called DefOps, which is short for Defensible Order Pending System.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	It is admitted that Teva USA's current suspicious order monitoring system is called DefOps, which is short for Defensible Order Pending System.
164	The DefOps system was developed internally by Teva, and was put in place in March 2015 (TEVA_MDL_A_ 02475565 to 585).	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon.	It is admitted that The DefOps system was developed internally by Teva USA, and was put in place in March 2015.
165	On August 19, 2015, Itai Rigbi, Teva Pharmaceutical Industries Ltd.'s Senior Director, Global Internal Audit – Head of Operations and R&D, forwarded to Ms. McGinn and others the final August 19, 2015 Global Internal Audit report of Teva's DEA Department (TEVA_MDL_A_ 02475565 to 585).		Admitted.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
166	The Excel spreadsheet at TEVA_MDL_A_13583538 accurately reflects excessive usage hold data for orders of Teva's controlled substance products, including its opioid products, from July 14, 2008 to March 6, 2015, including the following data fields:• A – Hold Name • B - Order Number • C - Line Number • D - Order Item • E - Description (product held) • F - Hold Date (includes time) • G - Ordered Quantity (units ordered) • H - Release (Y = Yes, released) • I - Hold Comment (includes any customer name and comments including reason for hold) • J - Release Reason Code • K - Release Comment (includes comments including reason for release) • L – Release Date (includes time) • M - Released By (the name of Teva employee releasing) • N - Ship To Org ID • O – Ship To Address • P – Bill To Address • Q – Extended Price		The authenticity of Teva_MDL_A_1358538 is admitted. The spreadsheet speaks for itself and Plaintiffs' characterizations of what the report reflects are denied. In particular, it is admitted only that orders identified in Teva_MDL_A_13583538 as "TUS DEA EXCESSIVE USAGE HOLD" on or after July 27, 2010 are accurate. Teva_MDL_A_13583538 does not accurately reflect orders that were manually held by DEA personnel or orders that were held prior to July 27, 2010.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
167	The Excel spreadsheet at TEVA_MDL_A_13253979 accurately reflects excessive usage hold data for orders of Teva's controlled substance products, including its opioid products, from March 6, 2015 to December 10, 2018, including the following data fields:• A – Hold ID • B - Order No. • C – Description (product held) • D - Order Item (number) • E – Line No. • F – Release Flag • G - Ordered Qty • H - Hold Date • I - Hold Comment (includes comments including reason for hold) • J - Release Comment (includes comments including reason for release) • K – Release Date • L – Release Reason Code • M - Released By (the name of Teva employee releasing) • N – Total Release Time SUM (hours held) • O – Ship to Org ID SUM • P – Ship To Address • Q – Bill To Customer (includes customer name)		The authenticity of Teva_MDL_A_13253979 is admitted. Plaintiffs' characterization of the spreadsheet is denied as stated. It is admitted only that Teva_MDL_A_13253979 accurately reflects orders pended by Teva USA's DefOPS system from March 6, 2015 to December 10, 2018.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
168	Appendix "A" to Teva's January 7, 2019 response to Plaintiffs Third Set of Interrogatories, No. 32, sets forth all of Teva's Suspicious Order Reports to the DEA. Appendix "A" references the following Bates-numbered reports to the DEA, which include duplicate reports: TEVA_MDL_A_02342525 TEVA_MDL_A_02342526 TEVA_MDL_A_02063701 TEVA_MDL_A_06532584 TEVA_MDL_A_02342529 TEVA_MDL_A_01061035 TEVA_MDL_A_02342527 TEVA_MDL_A_01056173 TEVA_MDL_A_01056175 TEVA_MDL_A_01056177 TEVA_MDL_A_01047432 TEVA_MDL_A_02342528 TEVA_MDL_A_02479933 TEVA_MDL_A_02479934 TEVA_MDL_A_02479935 TEVA_MDL_A_02479936 TEVA_MDL_A_02479937 TEVA_MDL_A_02345901 TEVA_MDL_A_02345902 TEVA_MDL_A_02345903 TEVA_MDL_A_02345904 TEVA_MDL_A_02345905 TEVA_MDL_A_02924242 TEVA_MDL_A_02924243 TEVA_MDL_A_01061036 TEVA_MDL_A_01058233 TEVA_MDL_A_01058231 TEVA_MDL_A_01058101 TEVA_MDL_A_01061046 TEVA_MDL_A_01058098 TEVA_MDL_A_01061039 TEVA_MDL_A_01061038 TEVA_MDL_A_02248780 TEVA_MDL_A_02248777 TEVA_MDL_A_01058228 TEVA_MDL_A_01058103 TEVA_MDL_A_01061041 TEVA_MDL_A_02248786 TEVA_MDL_A_02248782 TEVA_MDL_A_02248788 TEVA_MDL_A_04205312 TEVA_MDL_A_04205314 TEVA_MDL_A_04205295 TEVA_MDL_A_04205782 TEVA_MDL_A_04205293 TEVA_MDL_A_04205784 TEVA_MDL_A_02248790 TEVA_MDL_A_02248792 TEVA_MDL_A_02248800 TEVA_MDL_A_02248798 TEVA_MDL_A_02248796 TEVA_MDL_A_02924759 TEVA_MDL_A_02924761 TEVA_MDL_A_02924763 TEVA_MDL_A_02248803 TEVA_MDL_A_02248805 TEVA_MDL_A_02248804 TEVA_MDL_A_02248089 TEVA_MDL_A_02248090 TEVA_MDL_A_02248091 TEVA_MDL_A_02248092 TEVA_MDL_A_02248093 TEVA_MDL_A_01061043 TEVA_MDL_A_01057274 TEVA_MDL_A_01057277 TEVA_MDL_A_01057584 TEVA_MDL_A_01057586 TEVA_MDL_A_01057589 TEVA_MDL_A_01057590 TEVA_MDL_A_01057593 TEVA_MDL_A_01057596 TEVA_MDL_A_01057598 TEVA_MDL_A_01057601 TEVA_MDL_A_01057602 TEVA_MDL_A_01057604 TEVA_MDL_A_01057606 TEVA_MDL_A_01057608 TEVA_MDL_A_01057610 TEVA_MDL_A_01057612 TEVA_MDL_A_01057613 TEVA_MDL_A_01049461 TEVA_MDL_A_01049463 TEVA_MDL_A_01057194 TEVA_MDL_A_01061044.	The Teva Defendants object to this Request because the term "duplicate reports" is vague and ambiguous. The Teva Defendants object to this Request because it does not define a time frame that the Suspicious Order reports are purported to cover. The Teva Defendants object to this Request because it relies on Interrogatory responses and discovery from a separate matter.	Denied.
169	Actavis Inc. (Pre-Merger Actavis) received a warning letter from the DDMAC division of the FDA on February 18, 2010.	RFA 169 concerns pre-merger Actavis Inc.'s branded medicine business. The Teva Defendants and Actavis Generic Defendants do not have knowledge or information sufficient to admit or deny RFA's concerning branded medicines that were not part of the 2016 acquisition of the Actavis Generic Defendants.	
170	A copy of the February 18, 2010 DDMAC warning letter to Actavis Inc.appears at ALLERGAN_ MDL_ 00795835.	RFA 170 concerns pre-merger Actavis Inc.'s branded medicine business. The Teva Defendants and Actavis Generic Defendants do not have knowledge or information sufficient to admit or deny RFA's concerning branded medicines that were not part of the 2016 acquisition of the Actavis Generic Entities.	
171	Michael Perfetto attended (and/or attends) Healthcare Distribution Management Alliance ("HDMA") meetings.		Admitted.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
172	Nancy Baran attended (and/or attends) Healthcare Distribution Management Alliance ("HDMA") meetings.		Admitted.
173	Jinping McCormick attended (and/or attends) Healthcare Distribution Management Alliance ("HDMA") meetings.		Admitted.
174	David Myers attended (and/or attends) Healthcare Distribution Management Alliance ("HDMA") meetings.		Admitted.
175	Rachelle Galant attended (and/or attends) Healthcare Distribution Management Alliance ("HDMA") meetings.		Admitted.
176	Ara Aprahamian attended (and/or attends) Healthcare Distribution Management Alliance ("HDMA") meetings.		Admitted.
177	Mary Woods attended (and/or attends) Healthcare Distribution Management Alliance ("HDMA") meetings.		Admitted.
178	Paul Reed attended (and/or attends) Healthcare Distribution Management Alliance ("HDMA") meetings.		Admitted.
179	Mike Reed attended (and/or attends) Healthcare Distribution Management Alliance ("HDMA") meetings.		Admitted.
180	Brandon Miller attended (and/or attends) Healthcare Distribution Management Alliance ("HDMA") meetings.		Admitted.
181	In 2007, Cephalon pled guilty to promoting Actiq and two other drugs for off-label uses, including marketing Actiq for "non-cancer patients to use for such maladies as migraines, sickle-cell pain crises, injuries, and in anticipation of changing wound dressings or radiation therapy."	The Teva Defendants object to this Request for Admission for lack of completeness.	Denied.
182	Teva provided financial support for the Pain and Policy Studies Group, including provided educational grants.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the Term "financial support" as vague and ambiguous.	Denied as stated. Cephalon provided an educational grant to Pain and Policy Studies Group.
183	Documents reflecting Teva's support for the Pain and Policy Studies Group includes:2004: TEVA_MDL_A_07180634	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the Term "support" as vague and ambiguous.	The authenticity of Teva_MDL_A_07180634 is admitted. Teva_MDL_A_07180634 is a document that speaks for itself and Plaintiffs' characterizations of the document are denied.
184	Teva provided financial support for the American Pain Society, including provided support for CMEs, symposiums, and other educational grants.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the Term "financial support" as vague and ambiguous.	It is admitted that in certain instances Cephalon or Teva USA provided grants to American Pain Society for CMEs, symposiums or other educational grants.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
185	Documents reflecting Teva's support for the American Pain Society include: 2004: TEVA_MDL_A_05510585 2007: TEVA_MDL_A_01174148; TEVA_MDL_A_00852662 2008: TEVA_MDL_A_00565010 2012-2016: TEVA_MDL_A_00565051	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the Term "support" as vague and ambiguous.	The authenticity of the documents referenced in RFA 184 is admitted. The documents referenced in RFA 184 are documents that speak for themselves and Plaintiffs' characterizations of the documents are denied.
186	Teva provided financial support for the American Academy of Pain Medicine, including provided support for CMEs, symposiums, and other educational grants.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the Term "financial support" as vague and ambiguous.	It is admitted that in certain instances Cephalon or Teva USA provided grants to the American Academy of Pain Medicine for CMEs, symposiums or other educational grants.
187	Documents reflecting Teva's support for the American Academy of Pain Medicine include: 2004: TEVA_MDL_A_0l166259; TEVA_MDL_A_0l166268 2005: TEVA_MDL_A_01166609 2006: TEVA_MDL_A_01169010 2010: TEVA_MDL_A_01174864 2011: TEVA_MDL_A_01176224 2012-16: TEVA_MDL_A_00565051	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the Term "support" as vague and ambiguous.	The authenticity of the documents referenced in RFA 187 is admitted, except for TEVA_MDL_A_Ol166259 and TEVA_MDL_A_Ol166268, which do not appear to be accurate bates numbers. The documents referenced in RFA 187 are documents that speak for themselves and Plaintiffs' characterizations of the documents are denied.
188	Teva provided financial support for the American Pain Foundation, including provided support for corporate roundtable, patient education, printing and distribution of educational materials, and other educational grants.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the Term "financial support" as vague and ambiguous.	It is admitted that in certain instances Cephalon provided grants to the American Pain Foundation for corporate roundtable, patient education, printing and distribution of educational materials, and other educational grants.
189	Documents reflecting Teva's support for the American Pain Foundation include: 2004: TEVA_MDL_A_05509299; TEVA_MDL_A_01171351 2005: TEVA_MDL_A_0l171101 2006: TEVA_MDL_A_01089587; 2007: TEVA_MDL_A_01089590; TEVA_MDL_A_01174115	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the Term "support" as vague and ambiguous.	The authenticity of the documents referenced in RFA 189 is admitted, except for TEVA_MDL_A_Ol171101, which does not appear to be an accurate bates number. The documents referenced in RFA 189 are documents that speak for themselves and Plaintiffs' characterizations of the documents are denied.
190	Teva provided financial support for the Federation of State Medical Boards, including providing support for development of educational handbook and distribution of Responsible Opioid Prescribing, A Physician's Guide.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the Term "financial support" as vague and ambiguous.	It is admitted that in certain instances Cephalon provided grants to the Federation of State Medical Boards for development of an educational handbook and distribution of Responsible Opioid Prescribing, A Physician's Guide.
191	Documents reflecting Teva's support for the Federation of State Medical Boards include: 2006: TEVA_MDL_A_01088810 2007: TEVA_MDL_A_01088845	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the Term "support" as vague and ambiguous.	The authenticity of the documents referenced in RFA 191 is admitted. The documents referenced in RFA 191 are documents that speak for themselves and Plaintiffs' characterizations of the documents are denied.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
192	Teva provided financial support for the American Chronic Pain Association, including providing support for patient education grants.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the Term "financial support" as vague and ambiguous.	It is admitted that in certain instances Cephalon or Teva USA provided grants to the American Chronic Pain Association for patient education.
193	Documents reflecting Teva's support for the American Chronic Pain Association include: 2004: TEVA_MDL_A_01171351 2006: TEVA_MDL A_01089593 2013-2014: TEVA_MDL_A_06557278 2015: TEVA_MDL_A_01392474 2016: TEVA_MDL_A_0200SS99	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the Term "support" as vague and ambiguous.	The authenticity of the documents referenced in RFA 193 is admitted, except for TEVA_MDL_A_0200SS99, which does not appear to be an accurate bates number. The documents referenced in RFA 193 are documents that speak for themselves and Plaintiffs' characterizations of the documents are denied.
194	Teva provided financial support for the National Pain Foundation, including provided charitable support for fundraising dinners in 2004 and 2006.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the Term "financial support" as vague and ambiguous.	It is admitted that Cephalon provided charitable support to the National Pain Foundation for fundraising dinners in 2004 and 2006.
195	Documents reflecting Teva's support for the National Pain Foundation include: 2004: TEVA_MDL_A_01171351 2006: TEVA_MDL_A_00986868	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the Term "support" as vague and ambiguous.	The authenticity of the documents referenced in RFA 195 is admitted. The documents referenced in RFA 195 are documents that speak for themselves and Plaintiffs' characterizations of the documents are denied.
196	Teva provided financial support for the American Society of Pain Management Nursing, including provided support for CME at symposiums and other educational grants.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the Term "financial support" as vague and ambiguous.	It is admitted that in certain instances Cephalon or Teva USA provided grants to the American Society of Pain Management Nursing for continuing medical education at symposiums and other educational grants.
197	Documents reflecting Teva's support for the American Society of Pain Management Nursing include: 2006: TEVA_MDL_A_01089865 2006: TEVA_MDL_A_01172695 2007: TEVA_MDL_A_00823452 2008: TEVA_MDL_A_00823876 2012-2016: TEVA_MDL_A_00S65051	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the Term "support" as vague and ambiguous.	The authenticity of the documents referenced in RFA 197 is admitted, except for TEVA_MDL_A_OOS65051, which does not appear to be an accurate bates number. The documents referenced in RFA 197 are documents that speak for themselves and Plaintiffs' characterizations of the documents are denied.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
198	Teva provided financial support for the U.S. Pain Foundation, including providing support for patient education and advocacy programs.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the Term "financial support" as vague and ambiguous.	It is admitted that in certain instances Teva USA provided grants to the U.S. Pain Foundation for patient education and advocacy programs.
199	Documents reflecting Teva's support for the U.S. Pain Foundation include: 2013: TEVA_MDL_A_06557278 2014: TEVA_MDL_A_06557278	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the Term "support" as vague and ambiguous.	The authenticity of the documents referenced in RFA 199 is admitted. The documents referenced in RFA 199 are documents that speak for themselves and Plaintiffs' characterizations of the documents are denied.
200	Teva provided financial support for the Center for Practical Bioethics, including provided support for advocacy grants.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the terms "financial support" and "advocacy grants" as vague and ambiguous.	It is admitted that Teva USA provided a grant to the Center for Practical Bioethics for a program titled "Patient as Teachers."
201	Documents reflecting Teva's support for the Center for Practical Bioethics include:2014: TEVA_MDL_A_06557278	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the Term "support" as vague and ambiguous.	The authenticity of the document referenced in RFA 201 is admitted. The document referenced in RFA 201 speaks for itself and Plaintiffs' characterizations of the document is denied.
202	The Excel spreadsheet at TEVA_MDL_A_02214252 accurately reflects payments Teva made to healthcare providers related to opioids for the period from 2002 to 2008.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the term "payments" as vague and ambiguous.	The authenticity of Teva_MDL_A_02214252 is admitted. Plaintiffs' characterizations of the spreadsheet are denied.
203	The Excel spreadsheet at TEVA_MDL_A_03413816 accurately reflects payments Teva made to healthcare providers related to opioids for the period from 2009 to 2017.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the term "payments" as vague and ambiguous.	The authenticity of Teva_MDL_A_03413816 is admitted. Plaintiffs' characterizations of the spreadsheet are denied.
204	The Excel spreadsheet at TEVA_MDL_A_02401119 accurately reflects grants Teva made to organizations related to opioids for the period from 2008 to 2016.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the phrase "organizations related to opioids" because it is vague and ambiguous.	The authenticity of Teva_MDL_A_02491119 is admitted. Plaintiffs' characterizations of the spreadsheet are denied.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
205	The Excel spreadsheet at TEVA_MDL_A_00565051 accurately reflects grants Teva made to organizations related to opioids from the period of 2012 to 2016.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the phrase "organizations related to opioids" because it is vague and ambiguous.	The authenticity of Teva_MDL_A_00565051 is admitted. Plaintiffs' characterizations of the spreadsheet are denied.
206	The Excel spreadsheet at TEVA_MDL_A_04313917 accurately reflects grants Teva made to organizations related to opioid.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the phrase "organizations related to opioid" because it is vague and ambiguous.	The authenticity of Teva_MDL_A_00565051 is admitted. Plaintiffs' characterizations of the spreadsheet are denied.
207	The Excel spreadsheet at TEVA_MDL_A_00500208 accurately reflects Teva's membership and sponsorship pain descriptions for 2012.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to the phrase "membership and sponsorship pain descriptions" because it is vague, ambiguous or otherwise unclear.	Denied. Teva_MDL_A_00500208 is not an excel spreadsheet.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
208	"Appendix "A" to Teva's January 7, 2019 response to Plaintiffs Third Set of Interrogatories, No. 32 (in the proceeding In Re National Prescription Opiate Litigation, Case No. 17-md-2804), sets forth all of Teva's Suspicious Order Reports to the DEA. Appendix "A" references the following Bates-numbered reports to the DEA, which include duplicate reports: TEVA_MDL_A_02342525; TEVA_MDL_A_02342526; TEVA_MDL_A_02063701 TEVA_MDL_A_06532584 TEVA_MDL_A_02342529 TEVA_MDL_A_01061035 TEVA_MDL_A_02342527 TEVA_MDL_A_01056173 TEVA_MDL_A_01056175 TEVA_MDL_A_01056177 TEVA_MDL_A_01047432 TEVA_MDL_A_02342528 TEVA_MDL_A_02479933 TEVA_MDL_A_02479934 TEVA_MDL_A_02479935 TEVA_MDL_A_02479936 TEVA_MDL_A_02479937 TEVA_MDL_A_02345901 TEVA_MDL_A_02345902 TEVA_MDL_A_02345903 TEVA_MDL_A_02345904 TEVA_MDL_A_02345905 TEVA_MDL_A_02924242 TEVA_MDL_A_02924243 TEVA_MDL_A_01061036 TEVA_MDL_A_01058233 TEVA_MDL_A_01058231 TEVA_MDL_A_01058101 TEVA_MDL_A_01061046 TEVA_MDL_A_01058098 TEVA_MDL_A_01061039 TEVA_MDL_A_01061038 TEVA_MDL_A_02248780 TEVA_MDL_A_02248777 TEVA_MDL_A_01058228 TEVA_MDL_A_01058103 TEVA_MDL_A_01061041 TEVA_MDL_A_02248786 TEVA_MDL_A_02248782 TEVA_MDL_A_02248788 TEVA_MDL_A_04205312 TEVA_MDL_A_04205314 TEVA_MDL_A_04205295 TEVA_MDL_A_04205782 TEVA_MDL_A_04205293 TEVA_MDL_A_04205784 TEVA_MDL_A_02248790 TEVA_MDL_A_02248792 TEVA_MDL_A_02248800 TEVA_MDL_A_02248798 TEVA_MDL_A_02248796 TEVA_MDL_A_02924759 TEVA_MDL_A_02924761 TEVA_MDL_A_02924763 TEVA_MDL_A_02248803 TEVA_MDL_A_02248805 TEVA_MDL_A_02248804 TEVA_MDL_A_02248089 TEVA_MDL_A_02248090 TEVA_MDL_A_02248091 TEVA_MDL_A_02248092 TEVA_MDL_A_02248093 TEVA_MDL_A_01061043 TEVA_MDL_A_01057274 TEVA_MDL_A_01057277 TEVA_MDL_A_01057584 TEVA_MDL_A_01057586 TEVA_MDL_A_01057589 TEVA_MDL_A_01057590 TEVA_MDL_A_01057593 TEVA_MDL_A_01057596 TEVA_MDL_A_01057598 TEVA_MDL_A_01057601 TEVA_MDL_A_01057602 TEVA_MDL_A_01057604 TEVA_MDL_A_01057606 TEVA_MDL_A_01057608 TEVA_MDL_A_01057610 TEVA_MDL_A_01057612 TEVA_MDL_A_01057613 TEVA_MDL_A_01049461 TEVA_MDL_A_01049463 TEVA_MDL_A_01057194 TEVA_MDL_A_01061044.	This Request is duplicative of Request 168.	The Teva Defendants incorporate their objections and response to RFA 168.
209	To design and implement a suspicious order monitoring system, Teva and Cephalon communicated with Purdue, Mallinckrodt, and Actavis, and distributed questionnaires to the Distributors about their SOMs programs.	The Teva Defendants object to the term "Teva" to the extent it improperly groups Teva USA and Cephalon. The Teva Defendants object to this Request to the extent it exceeds the scope of CPLR 3123(a).	Denied.

#	**Pursuant to sections 3102 and 3123 of the New York Civil Practice Law and Rules ("CPLR") and the Rules of the Commercial Division and this Court's Case Management Order No. 2 (Dkt. 541), Plaintiffs request Defendants to admit the truth of matters of fact set forth below:**	**Objections**	**Response**
210	Each document and all data produced by you (or your present or former parents, subsidiaries, affiliates, predecessors, or successors) in this action. are authentic for the purposes of these consolidated proceedings.	The Teva Defendants and Actavis Generic Defendants object to this Request to the extent it exceeds the scope of CPLR 3123(a). The Teva Defendants and Actavis Generic Defendants object to addressing the authenticity of documents in the aggregate. Issues concerning authenticity should be addressed through the process set forth in the parties' Joint Trial Exhibit Stipulations. Dkt. 4444.	
211	Each document and all data produced by you (or your present or former parents, subsidiaries, affiliates, predecessors, or successors) in this action were made in the regular course of business by the person by whom it purports to have been made.	The Teva Defendants and Actavis Generic Defendants object to this Request to the extent it exceeds the scope of CPLR 3123(a). The Teva Defendants and Actavis Generic Defendants object to addressing the authenticity of documents in the aggregate. Issues concerning authenticity should be addressed through the process set forth in the parties' Joint Trial Exhibit Stipulations. Dkt. 4444.	
212	Each document and all data that were produced by you (or your present or former parents, subsidiaries, affiliates, predecessors, or successors) in this action were produced from your files and records.	The Teva Defendants and Actavis Generic Defendants object to this Request to the extent it exceeds the scope of CPLR 3123(a). The Teva Defendants and Actavis Generic Defendants object to addressing the authenticity of documents in the aggregate. Issues concerning authenticity should be addressed through the process set forth in the parties' Joint Trial Exhibit Stipulations. Dkt. 4444.	
213	Each document and all data that were produced by you (or your present or former parents, subsidiaries, affiliates, predecessors, or successors) in this action were maintained by you in the regular course of business.	The Teva Defendants and Actavis Generic Defendants object to this Request to the extent it exceeds the scope of CPLR 3123(a). The Teva Defendants and Actavis Generic Defendants object to addressing the authenticity of documents in the aggregate. Issues concerning authenticity should be addressed through the process set forth in the parties' Joint Trial Exhibit Stipulations. Dkt. 4444.	