

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF SUFFOLK

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Index No. 400000/2017

THIS DOCUMENT RELATES TO:

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

SOUND FILE NAME: P-28004_00001

PLAINTIFFS TRIAL
EXHIBIT
P-28004b_PDFTran

1 MICHAEL: Let's get this meeting
2 started. I want to go over some problems we are
3 having with Fentora and some new growth
4 opportunities I have come up with.

5 First off, which one of you geniuses
6 came up with this packaging? It's a pain in the
7 butt to open, and why 28 fricken tablets?

8 MAN 1: But Michael, it's purpose --
9 you well know this was a difficult challenge, to
10 use a child-resistant packaging, do whatever to
11 finally protect the (indiscernible) tablet.

12 MICHAEL: Silence.

13 MAN 1: Ah. Ah.

14 MICHAEL: Let this be a reminder to you
15 all that this organization will not tolerate
16 failure.

17 MAN 1: This feels like breakthrough
18 pain.

19 MICHAEL: Gentleman, let's get down to
20 business.

21 MAN 1: Ah.

22 MICHAEL: We've got a lot of work to
23 do.

24 MAN 1: Someone help me. Roy, I'm
25 still alive, only I am very badly burned.

1 MICHAEL: Excuse me. Yes, Frank? The
2 packaging problem? Solved. Tell the street. A
3 billion in sales this year. That's right.

4 MAN 1: Ah.

5 MICHAEL: Right. Let me go round the
6 table and introduce everyone.

7 Frau Costaneau. She will make the
8 sales force roleplay at the National Sales
9 meeting.

10 Danny Winkelman. He will listen to the
11 salesforce complaints, consider each suggestion
12 carefully, and then ignore them. In every
13 meeting, he subjects them mercilessly to his
14 beloved PowerPoint chats.

15 DANNY WINKELMAN: Yeah. They're always
16 after me lovely charts.

17 MICHAEL: Now we come to my number two
18 man. His name, Terry T. He will ramble onto the
19 salesforce until they agree to our strategy.

20 Terry will now provide an update on how
21 the launch is going.

22 TERRY T: Obviously, the launch has
23 gone very well, but we still have some Actiq
24 loyalists across the nation who have not
25 converted their prescribing from Actiq to

1 Fentora, so we have devised a comprehensive
2 strategy to drive sales in 2007. We intend to
3 reach every practice in every location no matter
4 how remote or how small. It's fabulous.

5 MICHAEL: Gentlemen, I have a plan.
6 It's quite brilliant, and it will blow away the
7 2007 forecast. We are going to roll out a
8 blockbuster marketing campaign focusing on
9 effervescent speed, a concept so nebulous, so
10 indecipherable it will absolutely drive
11 prescriptions from Actiq to Fentora.

12 TERRY T: Pardon me. We did that with
13 rocket ships. FDA shot it down.

14 MICHAEL: Okay, people. You've got to
15 tell me these things. I was in worldwide product
16 planning for two years. Throw me a fricken bone
17 here. I'm the boss. Need the info.

18 Plan 2. We will do studies in low-back
19 breakthrough pain, neuropathic breakthrough pain,
20 and for all non-cancer breakthrough pain, a new
21 pivotal study.

22 Using these studies, we will not only
23 show doctors around the world that Fentora works
24 for all breakthrough pain but that pain relief
25 starts in 10 minutes. That would be, I'd say, a

1 powerful breakthrough.

2 DANNY WINKELMAN: That's another one
3 we've done, Mikey.

4 MICHAEL: My other plan. I have done
5 qualitative and quantitative analysis and a
6 promotional response model to determine our OI.
7 I am forecasting that we can sell in the first 90
8 days, \$1 million of Fentora.

9 MS. COSTANEAU: Really now. We've sold
10 over \$33 million of Fentora in the first 90 days,
11 higher than any other opioid ever launched.

12 MICHAEL: Yes?

13 MS. COSTANEAU: Well, it was without
14 question the most successful launch ever in
15 Cephalon's history.

16 MICHAEL: You mean it?

17 MS. COSTANEAU: Yeah.

18 MICHAEL: Shoot. Oh, let's do what we
19 always do. Make life difficult for the
20 salesforce and let them get the job done.

21 Okay. Let's get back to the important
22 stuff. What colors are the new tchotchkes?

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C E R T I F I C A T I O N

I, Sonya Ledanski Hyde, certify that the foregoing transcript is a true and accurate record of the proceedings.

Sonya
Ledanski Hyde

Digitally signed by Sonya Ledanski
Hyde
DN: cn=Sonya Ledanski Hyde, o, ou,
email=digital@veritext.com, c=US
Date: 2021.07.22 11:39:43 -04'00'

Veritext Legal Solutions
330 Old Country Road
Suite 300
Mineola, NY 11501

Date: July 22, 2021

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