

# Opioid Litigation and Settlement Status Report

## Office of the Attorney General



STATE OF IDAHO  
OFFICE OF THE ATTORNEY GENERAL  
LAWRENCE G. WASDEN

- Brett DeLange  
Deputy Attorney General
- Summarize Opioid Claims and Litigation
- Summarize Opioid Settlement Matters

# Opioid Litigation and Settlement Status Report Office of the Attorney General

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Fourth Judicial District, Ada County  
Phil McGrane, Clerk of the Court  
By: Gena Foley, Deputy Clerk

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Division Chief  
Consumer Protection Division

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[Additional counsel listed on the signature page.]

## IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

STATE OF IDAHO, through ATTORNEY  
GENERAL LAWRENCE G. WASDEN,

*Plaintiff,*

v.

PURDUE PHARMA L.P., PURDUE  
PHARMA INC., RICHARD SACKLER,  
THERESA SACKLER, KATHE SACKLER,  
JONATHAN SACKLER, MORTIMER D.A.  
SACKLER, BEVERLY SACKLER, DAVID  
SACKLER, and ILENE SACKLER  
LEFCOURT,

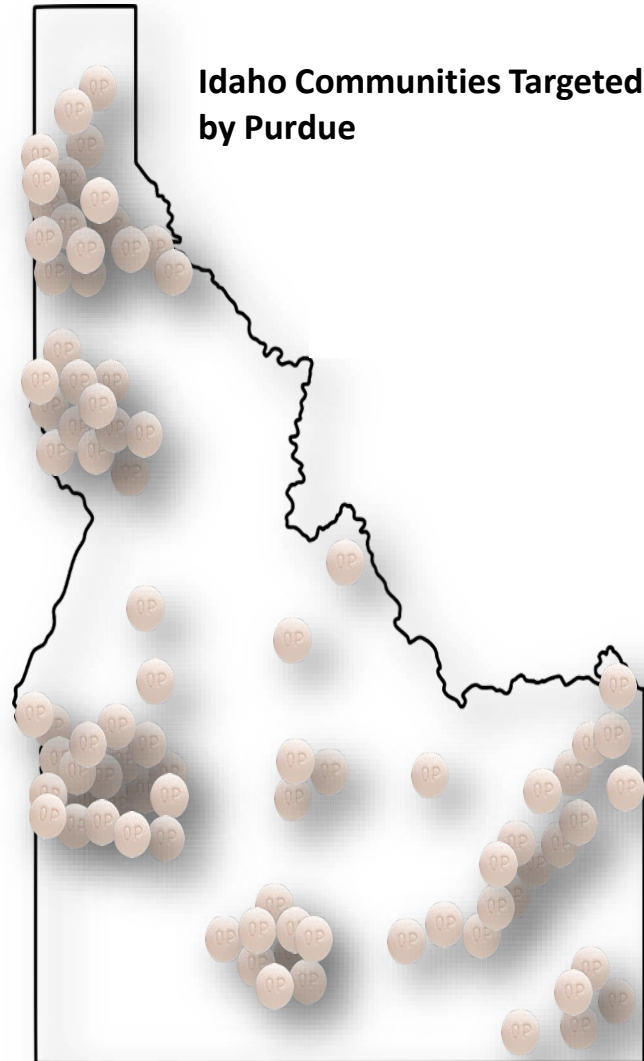
*Defendants.*

Case No. CV01-19-10061

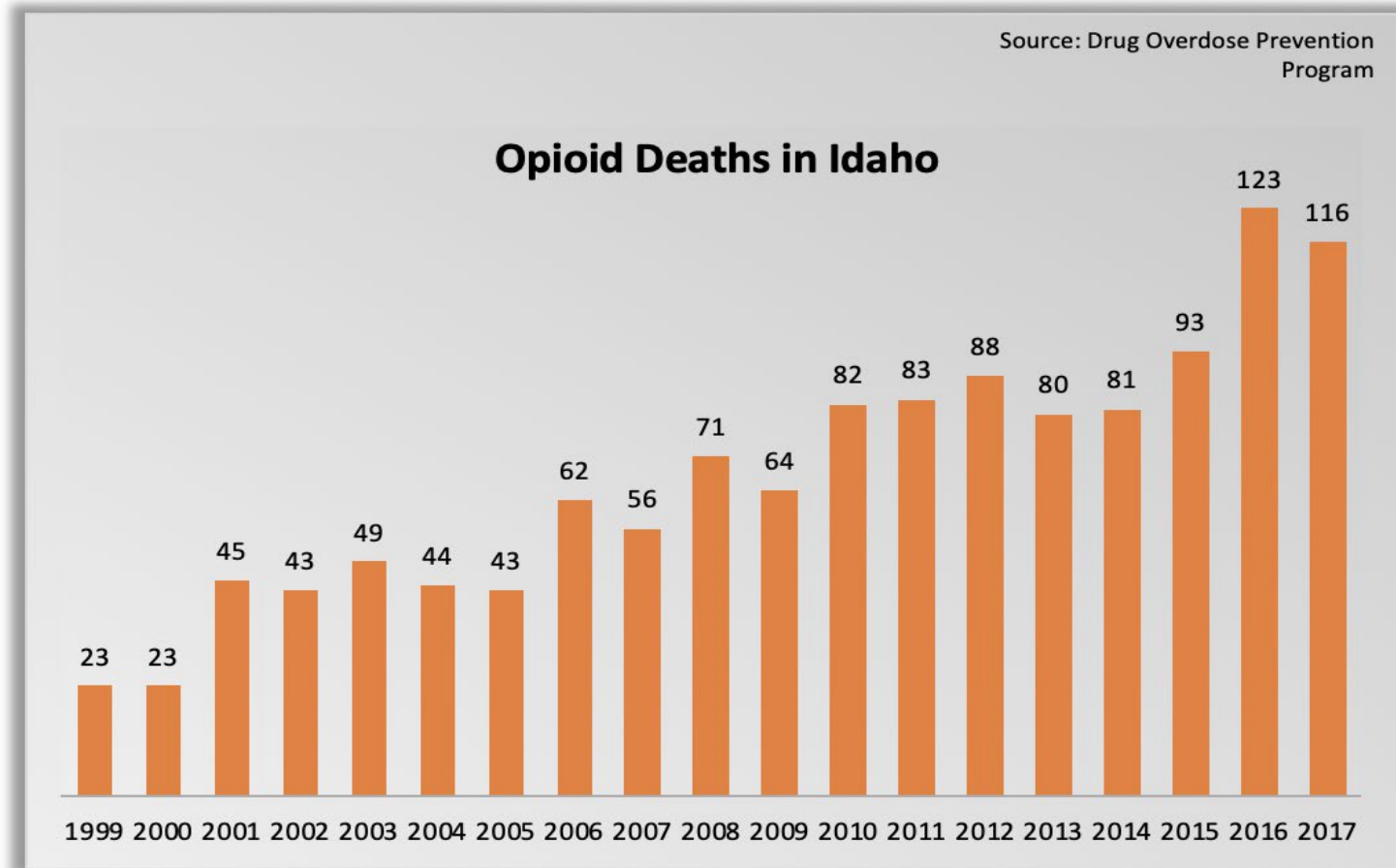
**COMPLAINT**

**DEMAND FOR JURY TRIAL**

# Opioid Litigation and Settlement Status Report Office of the Attorney General



# Opioid Litigation and Settlement Status Report Office of the Attorney General



# Opioid Litigation and Settlement Status Report

## Office of the Attorney General

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:	Chapter 11
PURDUE PHARMA L.P., <i>et al.</i> ,	Case No. 19-23649 (RDD)
Debtors.	(Jointly Administered)

### **Governmental Opioid Claimant Proof of Claim Form**

You may file your claim electronically at [PurduePharmaClaims.com](http://PurduePharmaClaims.com) via the link entitled "Submit a Claim."

For questions regarding this Proof of Claim Form, please call Prime Clerk at (844) 217-0912 or visit [PurduePharmaClaims.com](http://PurduePharmaClaims.com).

Read the instructions at the end of this document before filling out this form. This form is for governmental units and Native American Tribes to assert a general unsecured claim against the Debtors based on or involving opioids or their production, marketing and sale, including without limitation, the Debtors' production, marketing and sale of Purdue Opioids.

**Do not** use this form to assert any other pre-petition claims, including secured claims or claims entitled to priority under 11 U.S.C. § 507(a). Secured claims, claims entitled to priority under 11 U.S.C. § 507(a) and non-opioid related claims should be filed on a Non-Opioid Claimant Proof of Claim (Form 410).

Creditor (also referred to as "You" throughout) shall provide information responsive to the questions set forth below. Instructions and Definitions are provided at the end of this document. You shall provide information reasonably available to You and are not excused from providing the requested information for failure to appropriately investigate Your claim. Creditor shall supplement its responses if it learns that they are incomplete or incorrect in any material respect.

For Part 3, governmental units that have filed litigation against the Debtor(s) that is part of the federal multidistrict litigation in Ohio, *In re National Opiate Litigation*, MDL No. 17-02804 (N.D. Ohio 2017) ("Ohio MDL"), and have submitted a Government Plaintiff Fact Sheet in connection with that proceeding, may rely on their Government Plaintiff Fact Sheet to complete the questions in Part 3. For the avoidance of doubt, only governmental units who have filed litigation that is part of the Ohio MDL, and not governmental units that are part of the negotiation class in the Ohio MDL but have not otherwise filed litigation that is part of the MDL, may rely on their Government Plaintiff Fact Sheet to complete the questions in Part 3.

You must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, including the supporting documentation requested herein. Do not send original documents as they will not be returned, and they may be destroyed after scanning.

Fill in all the information about the claim as of September 15, 2019, the Petition Date. You may also fill in information regarding any claims You believe You may have after September 15, 2019 on this form. This form should be completed to the best of Your ability with the information available to You. If You are unable to answer certain questions at this time, the absence of an answer, by itself, will not result in the denial of Your claim, though You may be asked or required to provide additional information at a later date. You may also amend or supplement Your claim after it is filed.

#### **Part 1: Identify the Claim**

1. Who is the current creditor?	The States and other governmental entities listed on Schedule 1. Name of the entity to be paid for this claim: _____ Other names the creditor used with the Debtor(s): _____		
2. Has this claim been acquired from someone else or some other entity?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. From whom? _____		
3. Where should notices and payments to the creditor be sent? <small>Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)</small>	Where should notices to the creditor be sent?  See question 6. Name _____ Number _____ Street _____ City _____ State _____ ZIP Code _____ Contact phone _____ Contact email _____	Where should payments to the creditor be sent? (if different)  Name _____ Number _____ Street _____ City _____ State _____ ZIP Code _____ Contact phone _____ Contact email _____	

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[Additional counsel listed on the signature page.]

## IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

STATE OF IDAHO, through ATTORNEY  
GENERAL LAWRENCE G. WASDEN,

*Plaintiff,*

v.

PURDUE PHARMA L.P., PURDUE  
PHARMA INC., RICHARD SACKLER,  
THERESA SACKLER, KATHE SACKLER,  
JONATHAN SACKLER, MORTIMER D.A.  
SACKLER, BEVERLY SACKLER, DAVID  
SACKLER, and ILENE SACKLER  
LEFCOURT,

*Defendants.*

Case No. CV01-19-10061

**COMPLAINT**

**DEMAND FOR JURY TRIAL**

# Opioid Litigation and Settlement Status Report Office of the Attorney General

Case 1:19-cv-00286-REB Document 1 Filed 07/23/19 Page 1 of 91

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[Additional counsel listed on the signature page.]

## IN THE UNITED STATES DISTRICT COURT

### FOR THE DISTRICT OF IDAHO

STATE OF IDAHO, through ATTORNEY  
GENERAL LAWRENCE G. WAsDEN,

*Plaintiff,*

v.

MALLINCKRODT PLC,  
MALLINCKRODT LLC, JANSSEN  
PHARMACEUTICALS, INC., JOHNSON  
& JOHNSON, ORTHO-MCNEIL-  
JANSSEN PHARMACEUTICALS, INC.,  
JANSSEN PHARMACEUTICA, INC.,  
TEVA PHARMACEUTICALS USA INC.,  
CEPHALON, INC., TEVA  
PHARMACEUTICAL INDUSTRIES,  
LTD., ENDO INTERNATIONAL PLC,  
ENDO HEALTH SOLUTIONS INC.,  
ENDO PHARMACEUTICALS INC.,

Case No.:

**COMPLAINT**

**DEMAND FOR JURY TRIAL**

# Opioid Litigation and Settlement Status Report

## Office of the Attorney General

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**Attorneys for Plaintiff State of Idaho**

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Fourth Judicial District, Ada County  
Phil McGrane, Clerk of the Court  
By: Deputy Clerk - Ellis, Janet

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT  
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

<b>STATE OF IDAHO</b> , through ATTORNEY	)	CV01-21-01758
<b>GENERAL LAWRENCE G. WASDEN</b> ,	)	CASE NO. _____
	)	
Plaintiff,	)	
	)	
vs.	)	<b>CONSENT JUDGMENT</b>
	)	(Idaho Code § 48-606(4))
	)	
<b>MCKINSEY &amp; COMPANY, INC. UNITED</b>	)	
<b>STATES</b> ,	)	
	)	
Defendant.	)	

Plaintiff, the State of Idaho (the "State" or "Plaintiff") has filed a Complaint for a permanent injunction, damages and other relief in this matter pursuant to Idaho Code § 48-606(1) alleging that Defendant McKinsey & Company, Inc. United States ("McKinsey" or "Defendant"), committed violations of the Idaho Consumer Protection Act, Idaho Code §§ 48-601 *et seq.* Plaintiff, by its counsel, and McKinsey, by its counsel, have agreed to the entry of



# Opioid Litigation and Settlement Status Report

## Office of the Attorney General

LEGISLATURE OF THE STATE OF IDAHO  
Sixty-sixth Legislature First Regular Session - 2021

IN THE HOUSE OF REPRESENTATIVES

HOUSE BILL NO. 315

BY HEALTH AND WELFARE COMMITTEE

AN ACT

1 RELATING TO PUBLIC FUNDS; AMENDING CHAPTER 8, TITLE 57, IDAHO CODE, BY THE  
2 ADDITION OF A NEW SECTION 57-825, IDAHO CODE, TO ESTABLISH PROVISIONS  
3 REGARDING THE STATE-DIRECTED OPIOID SETTLEMENT FUND; AND DECLARING AN  
4 EMERGENCY.  
5

6 Be It Enacted by the Legislature of the State of Idaho:

7 SECTION 1. That Chapter 8, Title 57, Idaho Code, be, and the same is  
8 hereby amended by the addition thereto of a NEW SECTION, to be known and des-  
9 ignated as Section 57-825, Idaho Code, and to read as follows:

10 57-825. STATE-DIRECTED OPIOID SETTLEMENT FUND -- USE OF FUND MONEYS --  
11 RECOMMENDATIONS. (1) There is hereby established in the state treasury the  
12 state-directed opioid settlement fund, to be managed by the state treasurer.  
13 Moneys in the fund shall consist of:

14 (a) Moneys received by the state of Idaho pursuant to settlements and  
15 judgments obtained by the state relating to opioids;  
16 (b) Legislative appropriations to the fund;  
17 (c) Any bequests or donations to the fund; and  
18 (d) Interest earned on idle moneys in the fund.

19 (2) Moneys in the state-directed opioid settlement fund shall be used  
20 as determined by legislative appropriation, provided that such moneys must  
21 be used only for purposes relating to opioid abuse prevention and recovery  
22 programs.

23 (3) The Idaho behavioral health council shall meet as necessary and  
24 make recommendations to the joint finance-appropriations committee as to  
25 how moneys from the state-directed opioid settlement fund should be used.  
26 The provisions of this subsection shall be effective until July 29, 2024.

27 SECTION 2. An emergency existing therefor, which emergency is hereby  
28 declared to exist, this act shall be in full force and effect on and after its  
29 passage and approval.

# Opioid Litigation and Settlement Status Report

## Office of the Attorney General



STATE OF IDAHO  
OFFICE OF THE ATTORNEY GENERAL  
LAWRENCE G. WASDEN

The Attorney General is working hard to assert Idaho claims regarding violations of Idaho law. The Attorney General is also working diligently to obtain meaningful recoveries for the State.