AGENDA ITEM or FINAL CONTRACT REVIEW SUBMITTAL FORM

Agenda Item: Purdue Pharma Bankruptcy Claim

Action Requested:

Parties to the Agreement:

Term Begins: **Term Ends:** **Grant Contract #:**

Summary:

Purdue Pharma Bankruptcy Consolidated Claim filing

Fiscal Impact:

Submitted by: Lauren Hibbard **Submitter's Email Address:** lhibbard@gunnisoncounty.org

Finance Review: (●) Required ( ) Not Required

Comments:
No concerns. ln

Reviewed by: GUNCOUNTY1\lNienhueser Discharge Date: 7/16/2020

County Attorney Review: (●) Required ( ) Not Required

Comments:
ok db 7/15/20

Reveiwed by: Discharge Date: 7/16/2020 Certificate of Insurance Required

Yes ( ) No (●)

County Manager Review:

Comments:

Reveiwed by: GUNCOUNTY1\emense Discharge Date: 7/17/2020

(●) Consent Agenda ( ) Regular Agenda ( ) Worksession Time Allotted: 0

Agenda Date: 7/21/2020

Revised April 2015

Matthew Hoyt

From:	donotreply@epiq.msgbsvc.com on behalf of National Prescription Opiate Litigation <donotreply@OpioidsNegotiationClass.info>
Sent:	Tuesday, June 30, 2020 1:05 PM
To:	Matthew Hoyt
Subject:	Important Notice – PLEASE READ
Attachments:	Purdue - Exhibit B Consolidated Claim Authorization Form.pdf; Purdue - Exhibit C Consolidated Claim Summary Info Sheet.pdf

[EXTERNAL SENDER - USE CAUTION]

June 18, 2020

To: All Counties, Cities, Municipalities, Other Local Governments, and Tribes in the United States

Re: Filing a Proof of Claim in the Purdue Bankruptcy

To whom it may concern:

We are co-lead counsel and members of the Plaintiffs' Executive Committee (PEC) in *In re: National Prescription Opiate Litigation*, Case No. 17-md-2804, multidistrict litigation (MDL) against opioid manufacturers, distributors, and retailers before Judge Dan A. Polster in the District Court for the Northern District of Ohio. Co-lead counsel and the PEC were appointed by Judge Polster to coordinate and conduct the litigation on behalf of all plaintiffs in suits transferred to the MDL.

We write to emphasize the importance of filing an individual Proof of Claim in *In Re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.) ("Purdue Bankruptcy Cases"), for any county, city, municipality, other local government, or Native American Tribe ("Government Entity") that believes it has a claim against Purdue Pharma, L.P. or its affiliated debtors (collectively, "Purdue"). **Filing an *individual* Proof of Claim is the best way to ensure that you will have a right to vote on any Chapter 11 plan(s) of reorganization put forth in the Purdue Bankruptcy Cases and to receive benefit of any funds generated by the Bankruptcy confirmation plan.** The Bankruptcy Court has indicated a very strong preference for the creation of prospective abatement programs versus cash distributions of what in the big scheme will not be a large dollar amount. You need not have filed litigation against Purdue or have retained counsel in order to have a claim against Purdue and file a Proof of Claim in the Purdue Bankruptcy Cases.

The deadline to file a Proof of Claim is July 30, 2020 at 5:00 p.m. Eastern Time. You can file an individual Proof of Claim online at https://purduepharmaclaims.com/submitclaim.html. Simply follow the directions at that web address to complete and submit a claim electronically. The web address also contains directions for downloading and submitting a hard copy Proof of Claim, if that is your preference. Choose the "Governmental Opioid Claimant Proof of Claim Form" option.

The Proof of Claim form asks for the amount of your claim against Purdue. To help you determine this amount, you can visit https://purduelocalgovtclaims.info, which has estimates of damages and abatement costs for most counties, cities, and other municipalities in the U.S. Follow

the directions on the web page to see the estimate for your Government Entity. These estimates were developed by an economic expert at the request of the ad hoc committee of governmental and other contingent litigation claimants in the Purdue Bankruptcy Cases ("Ad Hoc Committee"). Please carefully read the Proof of Claim form and note that you, and only you, are responsible for the statements you make in your proof of claim.

Again, for a Government Entity holding claims against Purdue, submitting an ***individual*** Proof of Claim is vital to protecting your rights and the rights of all Government Entities asserting claims against Purdue. If you believe you have a claim against Purdue but, for whatever reason, do not wish to file an individual Proof of Claim, you should consider participating in the Consolidated Claim being facilitated by the Ad Hoc Committee. Instructions for how to participate in the Consolidated Claim, and conditions and limitations on participation, appear in the letter from Brown Rudnick LLP enclosed in this same mailing. If you file an individual Proof of Claim, you do not need to participate in the Consolidated Claim.

If you have questions about or need help completing an individual Proof of Claim, you can contact us at purdue@pecmdl2804.com. We will attempt to reply within 24 hours.

Sincerely,

All Co-Lead Counsel and Members of the Plaintiffs' Executive Committee,
In re: National Prescription Opiate Litigation, MDL 2804

Co-Lead Counsel:

Paul J. Hanly, Jr.
SIMMONS HANLEY CONROY LLC

Joseph F. Rice
MOTLEY RICE LLC

Paul T. Farrell Jr.
FARRELL LAW

Plaintiffs' Executive Committee:

Don Barrett
BARRETT LAW GROUP, P.A.

Elizabeth Cabraser
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

James E. Cecchi
CARELLA, BYRNE, CECCHI, OLSTEIN, BRODY & AGNELLO, P.C.

Erin Dickinson
CRUEGER DICKINSON LLC

James R. Dugan
THE DUGAN LAW FIRM, APLC

Paul J. Geller
ROBBINS GELLAR RUDMAN & DOWD LLP

Michael J. Fuller
HCHUGH FULLER LAW GROUP

R. Eric Kennedy
WEISMAN KENNEDY & BERRIS CO., LPA

Mark Lanier
LANIER LAW FIRM

Peter J. Mougey
LEVIN PAPANTONIO, THOMAS, MITCHELL, RAFFERTY & PROCTOR, PA

Ellen Relkin
WEITZ & LUXENBERG, P.C.

Lynn Sarko
KELLER ROHRBACK

Hunter J. Shkolnik
NAPOLI SHKOLNIK PLLC

Christopher A. Seeger
SEEGER WEISS LLP

Roland Tellis
BARON & BUDD, P.C.

James D. Young
MORGAN & MORGAN

Co-Liaison Counsel:

Peter Weinberger
SPANGENBERG SHIBLEY & LIBER, LLP

Steve Skikos
SKIKOS, CRAWFORD, SKIKOS AND JOSEPH

Troy Rafferty
LEVIN PAPANTONIO, THOMAS, MITCHELL, RAFFERTY & PROCTOR, PA

David J. Molton
direct dial: 212.209.4822
fax: 212.938.2822
dmolton@brownrudnick.com

June 17, 2020

TO ALL COUNSEL FOR ANY CITY, TRIBE, COUNTY, OR OTHER MUNICIPALITY HOLDING CLAIMS IN CONNECTION WITH *In Re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.)

RE: Consolidated Claim for Consenting Cities and Counties in Connection with *In Re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.)

THIS IS NOT A SOLICITATION TO VOTE ON ANY BANKRUPTCY PLAN

To whom it may concern:

As you may be aware, Brown Rudnick LLP ("**Brown Rudnick**") has been retained as co-counsel by the ad hoc committee of governmental and other contingent litigation claimants (collectively, the "**Ad Hoc Committee**") formed in connection with the bankruptcy cases of *In Re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.) (the "**Purdue Bankruptcy Cases**" and "**Bankruptcy Court**").[1] The deadline for filing proofs of claim in the Purdue Bankruptcy Cases for any person or entity, including cities, counties, municipalities, other local governments and Native American Tribes (a "**Government Entity**" or "**Government Entities**"), has been extended to **July 30, 2020 at 5:00 p.m.** (Prevailing Eastern Time) (the "**Bar Date**").

We and the Ad Hoc Committee are not any individual Government Entity's attorneys with respect to any claims a Government Entity has against Purdue Pharma, L.P. or its affiliated debtors (collectively, "**Purdue**"), and no recipient of this letter is a client of ours with respect to Purdue. Nothing contained herein is intended to be legal advice and only a Government Entity itself can determine whether it has a claim against Purdue. All Government Entities in receipt of this letter should consult with their attorney(s) in respect of this letter, the Purdue Bankruptcy Cases, and their claims against Purdue.

[[1] The Ad Hoc Committee is composed of: (1) Broward County, Fl.; (2) City of Chicago, Ill.; (3) Huntington/Cabell County; (4) King County, WA.; (5) Muscogee (Creek) Nation; (6) the Court appointed Co-Lead Counsel on behalf of the Court appointed Plaintiffs' Executive Committee in *In re National Prescription Opiate Litigation*, Case No. 17-md-02804, MDL No. 2804 (the "PEC"); (7) the City of Philadelphia, Pa.; (8) Santa Clara County, Ca.; (9) State of Florida; (10) State of

Georgia; (11) State of Louisiana; (12) State of Michigan; (13) State of Mississippi; (14) State of New Mexico; (15) State of Ohio; (16) State of Tennessee; (17) State of Texas; and (18) State of Utah.

The Bankruptcy Court's order entered on February 3, 2020 (the "**Bar Date Order**")[2] provides that all holders of claims that fail to timely file a proof of claim in appropriate form shall "(i) be forever barred, estopped, and enjoined from asserting such claims against the Debtors, their property, or their estates (or submitting a proof of claim with respect thereto) and (ii) not treated as a creditor with respect to such claim for the purposes of ***voting and distribution*** with respect to any chapter 11 plan or plans of reorganization that may be filed in these cases." *Id.* at ¶ 17 (emphasis added).

We encourage all Government Entities who hold claims against Purdue to file a proof of claim before the Bar Date, and the most effective and protective way to do so is to file an ***individual*** Proof of Claim. A Government Entity can file a Proof of Claim even if it has not filed a lawsuit against Purdue or retained counsel. Government Entities can access and file individual Proofs of Claim at https://purduepharmaclaims.com/submitclaim.html.

Nonetheless, for administrative ease, the Bar Date Order specifically authorizes the Ad Hoc Committee to act as a facilitator and file a Consolidated Claim on behalf of Government Entities that hold claims against Purdue, in lieu of those Government Entities filing individual Proofs of Claim.[3] For the avoidance of doubt, the Ad Hoc Committee's only purpose is to facilitate the process by which Government Entities can participate in a Consolidated Claim. The Ad Hoc Committee takes no position concerning any Government Entity's individual claim(s) against Purdue and is not adopting the Consolidated Claim as a claim on behalf of the Ad Hoc Committee. The Consolidated Claim will allow any Governmental Entity that does not wish to complete an individual Proof of Claim to submit a proof of claim through a streamlined process. A Government Entity that submits an individual Proof of Claim does not need to participate in the Consolidated Claim. The rest of this letter concerns this option to participate in a Consolidated Claim.

The Consolidated Claim will: (i) set forth a summary, prepared by the Ad Hoc Committee, of the collective claims and theories of recovery shared by all participants of the Consolidated Claim (*i.e.*, shared by all counties, cities, municipalities, and tribes) (the "**Collective Theories**," attached hereto as **Exhibit A**); and (ii) include a schedule listing the participants and for each participant: (a) its contact address, (b) email address, (c) attorney information, if any, (d) any claims or causes of action that participant believes it has against Purdue that is not encapsulated by the Collective Theories, and (e) the amount of monetary relief and remedies sought, including but not limited to damages and abatement costs (the "**Claim Amount**"). The schedule will be in substantially the same form as the Consolidated Claim Summary Information Sheet, attached hereto as **Exhibit C**.

Any Government Entity that wishes to be included in a Consolidated Claim must provide the information described above ***and*** provide its written consent and authorization to the Ad Hoc Committee and its co-counsel by completing, signing, and returning the Consolidated Claim Authorization Form (the "**Consent Form**"), attached hereto as **Exhibit B**. By joining the Consolidated Claim, a Government Entity will be bound by the Collective Theories as well as the Claim Amount asserted therein. However, each participating Government Entity has the right to amend its claim(s) included in the Consolidated Claim by the Bar Date. Any amendment sought to a claim(s) included in the Consolidated Claim after the Bar Date would require approval of the Bankruptcy Court. This letter is not intended to provide legal advice on your ability to amend your claim(s).

[[2] *See* Bar Date Order, *In re Purdue Pharma L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y. 2019) [Docket No. 800]. The Bar Date Order and all other documents filed in the Bankruptcy Cases are available at https://restructuring.primeclerk.com/purduepharma/.

[3] *See* Bar Date Order at 6-7, ¶¶ 7, 8. There is no fee for filing an individual proof of claim or for participating in this Consolidated Claim.

Government Entities that consent to and authorize their participation in the Consolidated Claim must choose one of three options for how to describe the monetary relief sought for their claims. Each participating Government Entity must select its desired option on the Consent Form:

(Option 1) The Ad Hoc Committee has worked with Ted Miller, an internationally recognized safety economist with Pacific Institute for Research and Evaluation (PIRE), who has developed a model that estimates monetary relief, including damages and abatement costs, which cities, counties, and municipalities across the United States (the "**Municipality Claim Model**") may assert against the Debtors. The Government Entity may elect to use an amount derived for that entity using the Municipality Claim Model, if such an amount is available. The amount calculated for each Government Entity using the Municipality Claim Model can be viewed online at https://purduelocalgovtclaims.info. Please note that the Municipality Claim Model does not provide a cost estimate for Native American Tribes. Native American Tribes are directed to select from Option 2 and Option 3 when completing a Consent Form. When reviewing the Municipality Claim Model and the website that contains the Model, please carefully review the notes, disclaimers and explanatory language contained therein.

(Option 2) The Government Entity may calculate and set forth its own dollar value for its Claim Amount.

(Option 3) The Government Entity may elect to have its Claim Amount described as "unliquidated."

Regardless of which of the three options a participating Government Entity selects, the Consolidated Claim filed by the Ad Hoc Committee will state that Claim Amounts included therein are "not less than" the amount indicated in the schedule and that the scheduled amounts are estimates.

In order for you or your client's claim to be included as part of the Consolidated Claim to be filed by the Ad Hoc Committee, the Consent Form (*i.e.*, Exhibit B) must be fully completed, signed, and returned to us no later than July 15, 2020 via email at upinelo@brownrudnick.com and dlimongello@brownrudnick.com. We will provide email confirmation of receipt of your completed Consent Form. If you do not receive an email confirmation of our receipt by July 17, 2020 please follow-up by email or phone call. Additionally, none of Brown Rudnick LLP, its agents and employees, nor any member of the Ad Hoc Committee or their counsel, shall have any liability to you or your client, as applicable in respect of the Consolidated Proof of Claim, the Bankruptcy Cases, your or your Client's Claim(s), or the submission of or failure to submit the Consolidated Claim. Return of the Consent Form shall constitute you and/or your client's acknowledgement of no liability and waiver of any liability related to the foregoing.

If any entity or counsel has questions or needs assistance in completing the Consent Form for the Consolidated Claim process, they may contact Uriel Pinelo (upinelo@brownrudnick.com, 212.209.4853) and Dale Limongello (dlimongello@brownrudnick.com, 212.209.4874).

Sincerely,
BROWN RUDNICK LLP
/s/ David J. Molton
David J. Molton

EXHIBIT A

Collective Theories

The Government Entities' claims arise from Purdue's tortious, deceptive, unreasonable, or otherwise unlawful conduct with respect to the marketing, promotion, sale, and/or distribution of prescription opioid products, including all forms and versions of Purdue's morphine, oxycodone, hydrocodone, and buprenorphine products distributed in the U.S.

Such conduct includes, without limitation, Purdue's creation, use, and/or participation in a sophisticated and highly deceptive and unfair marketing, "education," promotion and lobbying campaign that dates back to the late 1990s. This campaign set out to, and did, reverse and alter understandings of the risks, benefits, and appropriate use of prescription opioids. Purdue sought to and did expand the use of prescription opioids by (at least) downplaying their risks and overstating their benefits, particularly for the treatment of chronic, non-cancer pain. Purdue sought to and did do this overtly (through its sales force and Purdue "educational" efforts), as well as covertly through the creation, use, funding, and coopting of organizations, front groups, "key opinion leaders," studies, and literature.

In addition to the foregoing, Purdue also violated its legal and statutory duties (including under the federal Controlled Substances Act) to monitor for, prevent, and minimize diversion of its prescription opioid products, including failing to sufficiently monitor for and prevent the fulfillment and delivery of suspicious orders placed by distributors of Purdue's opioid products and by the downstream customers of those distributors and/or by dispensers of Purdue's opioid products.

Purdue acted on its own, as well as jointly with others, including with other manufacturers, distributors, and dispensers of prescription opioids with respect to the conduct at issue.

Purdue's conduct caused and continues to cause and threaten, without limitation, far-reaching consequences in the communities represented by the Government Entities, including without limitation: (1) the prescribing, purchase, distribution, dispensing, and use of vastly inflated quantities of prescription opioids, (2) the abuse, misuse, and imprudent and unnecessary use of prescription opioids, (3) opioid addiction and opioid use disorder ("OUD") and the need for treatment for the same, (4) hospitalizations, injuries, and deaths caused by opioids, (5) crime, prosecutions, and jailing associated with opioids abuse, misuse, and unlawful sales, (6) the need to monitor for and treat neonatal abstinence syndrome, (7) the need to purchase, train on, and deploy anti-overdose medications among first-responders and others, (8) the need to provide addiction and mental health services to those suffering from addiction/OUD and their families and loved ones, (9) the loss of income and property tax revenues flowing from the foregoing impacts, and (10) the diversion and/or increased use of myriad governmental health, safety, education, justice, and social services to respond to the impact of opioids.

The Government Entities assert all available legal, equitable, and statutory claims against Purdue arising from the foregoing conduct, including without limitation, claims for public and/or private nuisance, unfair and deceptive practices, fraud, negligence, unjust enrichment, false claims and breach of contract, insurance fraud, conspiracy, violation of federal and state RICO laws, and violation of federal and state laws governing the sale, distribution, and anti-diversion requirements for narcotics.

The Government Entities seek all available legal, equitable, and statutory remedies against Purdue, monetary and non-monetary, for any and all past or present conduct and for past, present, or future injury or threat of injury arising or flowing from the foregoing conduct, including injunctive relief, compensatory, consequential, and punitive damages, the costs of abatement, disgorgement, reimbursement for government expenditures, any and all fines and penalties permitted under applicable state or federal law, and reasonable legal fees, costs, and expenses, pre-judgment interest, post-judgment interest, and such other relief as is just and equitable.

For the avoidance of doubt, the Government Entities incorporate by reference as if set forth fully here all of the factual allegations, claims, and prayers for relief set forth in their most current federal and/or state court complaints naming Purdue.

EXHIBIT B

In Re Purdue Pharma, L.P., et al.

CONSOLIDATED CLAIM AUTHORIZATION FORM

THIS FORM MUST BE COMPLETED AND SUBMITTED WITH THE CONSOLIDATED CLAIM

DOCUMENTATION BY EACH CONSENTING CLAIMANT

The undersigned claimholder in connection with the bankruptcy estates of *In Re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.) (the "**Consenting Claimant**") hereby elects to schedule and file any and all claims held against the **Purdue Debtors**[4] as part of a consolidated claim (the "**Consolidated Claim**"), as allowed pursuant to that order establishing **5:00 p.m. (Prevailing Eastern Time) on July 30, 2020** as the last date for each person or entity, including cities, counties, municipalities, other local governments and Native American Tribes, to file a Proof of Claim against any of the Purdue Debtors (the "**Bar Date Order**" at Docket No. 800)[5] .

For the avoidance of doubt, the Consenting Claimant[6] understands and acknowledges that the Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, and all applicable information in the Consolidated Claim Summary Information Sheet, will be treated as the Consenting Claimant's own Proof of Claim filed against each of the Purdue Debtors, and the Consenting Claimant agrees to be so bound for all Proof of Claim purposes subject to the following. In the event that the Consenting Claimant has already filed or will file a separate and individual Proof of Claim against each or any of the Purdue Debtors, such separately filed Proof of Claim shall override the Consolidated Claim, so long as it otherwise complies with the Bar Date Order. The Consenting Claimant further acknowledges and agrees that the Ad Hoc Committee's only purpose is to facilitate the process by which Government Entities can participate in a Consolidated Claim and the Ad Hoc Committee: (1) takes no position concerning any Government Entity's individual claim(s) against Purdue and (2) is not adopting the Consolidated Claim as a claim on behalf of the Ad Hoc Committee. The Consenting Claimant hereby authorizes the Ad Hoc Committee, through any one or more of the following (the "**Authorized Representative**") to submit the Consolidated Claim: Kramer Levin Naftalis & Frankel LLP, Otterbourg P.C., Brown Rudnick LLP, Gilbert LLP.

Authorized Representative's Name: Ad Hoc Group of Consenting Claimants, c/o Kramer Levin Naftalis & Frankel LLP, Otterbourg P.C., Brown Rudnick LLP, Gilbert LLP

[[4]Purdue Pharma, L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield Bio Ventures L.P. Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma L.P., and SVC Pharma Inc. (collectively, the "**Purdue Debtors,**" "**Debtors**" or "**Purdue**").

[5] On June 3, 2020, the Bankruptcy Court extended the original Bar Date from June 30, 2020 to July 30, 2020.

[6] Terms not otherwise defined herein shall have the meaning set forth in the June 17, 2020 Letter originally enclosed with this Consolidated Claim Authorization Form. Please also note that executing this Consent Form constitutes agreement to the limitations of liability and waivers contained in the June 17, 2020 Letter originally enclosed with this Consolidated Claim Authorization Form. Please contact Uriel Pinelo (upinelo@brownrudnick.com) for a copy of such letter.

Please provide the following information (each piece of information is necessary and must be included in the Consolidated Claim):

1. Name, Address, and Contact Information (city, county, other municipality, or tribe):

_____
Name of Consenting Claimant (city, county or municipality, or tribe)

_____
Number Street

_____
City State Zip Code

2. Attorney Information, if any:

_____
Name of Attorney & email address

_____
Number Street

_____
City State Zip Code

3. Claim Amount. Please check one of the following three boxes and input your Claim Amount, if applicable:

Option 1 [ ] Please include the Claim Amount derived from the Municipality Claim Model, if available. (Please note that this option is not available to Native American Tribes)

Option 2 [ ] Please include the following Claim Amount: "not less than $_____"

Option 3 [ ] Please indicate that my claim is "unliquidated."

4. Additional Theories. In addition to the Collective Theories, the claimant holds the following separate claims and causes of action against Purdue:

Date:

_____
Name and Title of Person Authorized to Complete and Sign This Form

_____
Phone Number Email

_____

Consenting Claimant's Signature

63737632 v21

EXHIBIT C

In Re Purdue Pharma, L.P., et al., Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.)
Consolidated Claim of: Ad Hoc Committee of Consenting Claimants
Number of Consenting Claimants: [#]
Counsel or Representative Authorized to file this Consolidated Claim: [ ]

SUMMARY OF CONSOLIDATED CLAIM

Claimant Identification Information (Who is the Creditor)?	Creditor's Address	Email Address for Creditor	Attorney Contact Information, If Any	Additional Claim Theories	Amount of Consolidated Claim (which includes unliquidated claims amount)
					NO LESS THAN [ ]

Please note: This email message was sent from a notification-only address that cannot accept incoming email. Please do not reply to this message.

If you would prefer not to receive further messages from this sender, please Click Here and confirm your request.

From: Pinelo, Uriel
To: Errol Davis; Limongello, Dale
Cc: David Baumgarten; Matthew Hoyt
Subject: RE: Purdue Pharma, L.P., et al., Case No. 19-23649 (RDD) - Consolidated Claim Authorization Form
Date: Wednesday, July 15, 2020 10:25:23 PM

[EXTERNAL SENDER - USE CAUTION]

Errol,

Gunnison County's Consolidated Claim Authorization Forms has been received. No further information is required at this time. We will provide further communication regarding the final submission of the Consolidated Claim closer to the July 30 filing deadline.

Thank you,

Uri

Uriel Pinelo
T: 212.209.4853
F: 212.938.2853
upinelo@brownrudnick.com

Please consider the environment before printing this e-mail

From: Errol Davis [mailto:EDavis@gunnisoncounty.org]
Sent: Wednesday, July 15, 2020 3:47 PM
To: Pinelo, Uriel; Limongello, Dale
Cc: David Baumgarten; Matthew Hoyt
Subject: Purdue Pharma, L.P., et al., Case No. 19-23649 (RDD) - Consolidated Claim Authorization Form

External E-mail. Use caution accessing links or attachments.

Good afternoon,

Please find attached the Consolidated Claim Authorization Form for the claim of the Board of County Commissioners of the County of Gunnison, Colorado in the above reference matter. Thank you.

Errol Davis
Paralegal I
Gunnison County Attorney's Office
200 East Virginia Avenue
Gunnison, CO 81230
Phone: (970) 641-5300

Fax: (970) 641-7696

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CONFIDENTIALITY NOTICE

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To the extent Brown Rudnick is a "data controller" of the "personal data" (as each term is defined in the European General Data Protection Regulation) you have provided to us in this and other communications between us, please see our privacy statement and summary here which sets out details of the data controller, the personal data we have collected, the purposes for which we use it (including any legitimate interests on which we rely), the persons to whom we may transfer the data and how we intend to transfer it outside the European Economic Area.

****

EXHIBIT B

In Re Purdue Pharma, L.P., et al.

CONSOLIDATED CLAIM AUTHORIZATION FORM

THIS FORM MUST BE COMPLETED AND SUBMITTED WITH THE CONSOLIDATED CLAIM DOCUMENTATION BY EACH CONSENTING CLAIMANT

The undersigned claimholder in connection with the bankruptcy estates of *In Re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.) (the "**Consenting Claimant**") hereby elects to schedule and file any and all claims held against the **Purdue Debtors**[4] as part of a consolidated claim (the "**Consolidated Claim**"), as allowed pursuant to that order establishing **5:00 p.m. (Prevailing Eastern Time) on July 30, 2020** as the last date for each person or entity, including cities, counties, municipalities, other local governments and Native American Tribes, to file a Proof of Claim against any of the Purdue Debtors (the "**Bar Date Order**" at Docket No. 800)[5].

For the avoidance of doubt, the Consenting Claimant[6] understands and acknowledges that the Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, and all applicable information in the Consolidated Claim Summary Information Sheet, will be treated as the Consenting Claimant's own Proof of Claim filed against each of the Purdue Debtors, and the Consenting Claimant agrees to be so bound for all Proof of Claim purposes subject to the following. In the event that the Consenting Claimant has already filed or will file a separate and individual Proof of Claim against each or any of the Purdue Debtors, such separately filed Proof of Claim shall override the Consolidated Claim, so long as it otherwise complies with the Bar Date Order. The Consenting Claimant further acknowledges and agrees that the Ad Hoc Committee's only purpose is to facilitate the process by which Government Entities can participate in a Consolidated Claim and the Ad Hoc Committee: (1) takes no position concerning any Government Entity's individual claim(s) against Purdue and (2) is not adopting the Consolidated Claim as a claim on behalf of the Ad Hoc Committee. The Consenting Claimant hereby authorizes the Ad Hoc Committee, through any one or more of the following (the "**Authorized Representative**") to submit the Consolidated Claim: Kramer Levin Naftalis & Frankel LLP, Otterbourg P.C., Brown Rudnick LLP, Gilbert LLP.

Authorized Representative's Name: Ad Hoc Group of Consenting Claimants, c/o Kramer Levin Naftalis & Frankel LLP, Otterbourg P.C., Brown Rudnick LLP, Gilbert LLP

Please provide the following information (each piece of information is necessary and must be included in the Consolidated Claim):

1. Name, Address, and Contact Information (city, county, other municipality, or tribe):

Board of County Commissioners of the County of Gunnison, Colorado

Name of Consenting Claimant (city, county or municipality, or tribe)

200 East Virginia Avenue

Number Street

Gunnison	CO	81230
City	State	Zip Code

[4]Purdue Pharma, L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield Bio Ventures L.P. Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma L.P., and SVC Pharma Inc. (collectively, the "**Purdue Debtors**," "**Debtors**" or "**Purdue**").

[5]On June 3, 2020, the Bankruptcy Court extended the original Bar Date from June 30, 2020 to July 30, 2020.

[6]Terms not otherwise defined herein shall have the meaning set forth in the June 17, 2020 Letter originally enclosed with this Consolidated Claim Authorization Form. Please also note that executing this Consent Form constitutes agreement to the limitations of liability and waivers contained in the June 17, 2020 Letter originally enclosed with this Consolidated Claim Authorization Form. Please contact Uriel Pinelo (upinelo@brownrudnick.com) for a copy of such letter.

2. Attorney Information, if any:

David Baumgarten, dbaumgarten@gunnisoncounty.org

Name of Attorney & email address

200 East Virginia Avenue

Number Street

Gunnison CO 81230

City State Zip Code

3. Claim Amount. Please check one of the following three boxes and input your Claim Amount, if applicable:

Option 1 ☑ Please include the Claim Amount derived from the Municipality Claim Model, if available. (Please note that this option is not available to Native American Tribes)

Option 2 ☐ Please include the following Claim Amount: "not less than $ _____"

Option 3 ☐ Please indicate that my claim is "unliquidated."

4. Additional Theories. In addition to the Collective Theories, the claimant holds the following separate claims and causes of action against Purdue:

_____

_____

_____

Date: July 15, 2020

David Baumgarten, Gunnison County Attorney

Name and Title of Person Authorized to Complete and Sign This Form

(970) 641-5300 dbaumgarten@gunnisoncounty.org

Phone Number Email

David Baumgarten

Consenting Claimant's Signature