New York Menlo Park Washington DC São Paulo London Paris Madrid Tokyo Beijing Hong Kong



Benjamin S. Kaminetzky

Davis Polk & Wardwell LLP 450 Lexington Avenue New York, NY 10017 212 450 4259 tel 212 701 5259 fax ben.kaminetzky@davispolk.com

September 4, 2019

The Honorable Scott S. Harris Clerk of the Court Supreme Court of the United States One First Street, NE Washington, D.C. 20543

Re: State of Arizona v. Richard Sackler et al., No. 220151

Dear Mr. Harris:

I represent defendants Purdue Pharma, L.P. and Purdue Pharma Inc. in the abovecaptioned matter. Plaintiff filed its motion for leave to file a bill of complaint on July 31, 2019, and the opposition is due on September 30, 2019. Purdue Pharma, L.P. and Purdue Pharma Inc. respectfully request, pursuant to Rule 30.4 of the Rules of this Court, a 30-day extension of time to and including October 30, 2019, within which to file a brief in opposition.

Purdue Pharma, L.P. and/or Purdue Pharma Inc. are defendants in nearly 2,600 actions nationwide that, like Plaintiff's proposed complaint here, ultimately arise out of allegations that these and other entities caused the problem of prescription and illicit opioid abuse and misuse currently affecting communities across the nation. A number of actions assert fraudulent conveyance claims similar to those asserted by Plaintiff. The pending actions, some of which are at advanced stages and one of which is scheduled for trial in October 2019, have and will continue to require significant attention from senior in-house counsel. The requested extension of time is necessary to facilitate preparation of the brief in opposition. In addition, I have been informed that at least one State intends to file an *amicus* brief in support of Plaintiff's motion. The requested extension will provide Purdue Pharma, L.P. and Purdue Pharma Inc. with an opportunity to consider and respond to the arguments advanced in any such *amicus* brief.

This is the first request for an extension by Purdue Pharma, L.P. and Purdue Pharma Inc. I have conferred with counsel for Plaintiff, which consents to this request.

Thank you in advance for consideration of this matter.

Respectfully,

Bart

Benjamin S. Kaminetzky

Counsel of Record for Plaintiff cc: **Richard Sackler** Theresa Sackler Kathe Sackler . Jonathan Sackler Mortimer D.A. Sackler Beverly Sackler David Sackler Ilene Sackler Lefcourt The Purdue Frederick Company, Inc. Purdue Holdings, L.P. PLP Associates Holdings L.P. B.R. Holdings Associates L.P. Rosebay Medical Company L.P. Beacon Company