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October 30, 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. 22O151**

Dear Mr. Harris:

This Firm and Debevoise & Plimpton write on behalf of the Individual Former Directors, Beacon and Rosebay,<sup>1</sup> defendants in the above-captioned matter. Plaintiff filed its motion for leave to file a bill of complaint on July 31, 2019, and defendants' response, if any, is due on October 30, 2019. We write to inform the Court that the Individual Former Directors, Beacon and Rosebay will not file oppositions to that motion, unless one is requested by the Court.

On October 11, 2019, the United States Bankruptcy Court for the Southern District of New York issued an order, which was amended on October 18, 2019 (the "**Amended Preliminary Injunction Order**") pursuant to 11 U.S.C. § 105(a), granting, in part a motion by Purdue Pharma L.P. and certain affiliated debtors (the "**Debtors**"), for a preliminary injunction. *See In re Purdue Pharma L.P., et al.*, No. 19-23649 (RDD), Adv. Pro. No. 19-08289, Dkt. No. 89 (Bankr. S.D.N.Y. Oct. 18, 2019). The Amended Preliminary Injunction Order "prohibit[s] and enjoin[s]" various "Governmental Defendants" from "commenc[ing] or continu[ing]" proceedings against the Debtors and certain related parties—including against the Individual Former Directors, Beacon

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<sup>1</sup> The "**Individual Former Directors**" are Richard S. Sackler, David A. Sackler, and Jonathan D. Sackler—represented by Joseph Hage Aaronson—and Mortimer D.A. Sackler, Kathe A. Sackler, Ilene Sackler Lefcourt, and Theresa Sackler—represented by Debevoise & Plimpton. "**Beacon**" is the Beacon Company, represented by Debevoise & Plimpton. "**Rosebay**" is Rosebay Medical Company, L.P., represented by Joseph Hage Aaronson. On October 14, 2019, defendant Beverly Sackler passed away. *See Suggestion of Death, In re Purdue Pharma L.P.*, No. 19-23649 (RDD), Dkt. 301 (Bankr. S.D.N.Y. Oct. 14, 2019). She was formerly represented by Joseph Hage Aaronson.

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and Rosebay. *Id.* at 5. The State of Arizona has agreed to “voluntarily consent to abide by the terms of [the Amended Preliminary Injunction] Order.” *Id.* at 4 n.2.

In light of the Bankruptcy Court’s Amended Preliminary Injunction Order, and the State of Arizona’s agreement to abide by its terms, the Individual Former Directors, Beacon and Rosebay will not file an opposition to plaintiff’s motion for leave to file a bill of complaint in the above-captioned action.

Sincerely,

**JOSEPH HAGE AARONSON LLC**

/s/ Gregory P. Joseph

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and Rosebay Medical Company, L.P.*

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*Counsel of Record for Ilene Sackler Lefcourt, Kathe  
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and The Beacon Company*

cc: Counsel of Record for Plaintiff  
Counsel of Record for Purdue Pharma, L.P., Purdue Pharma, Inc., and The Purdue  
Frederick Company, Inc.  
Counsel for Purdue Holdings, L.P., PLP Associates Holdings L.P., and B.R. Holdings  
Associates L.P.